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Acronyms
The following is a list of acronyms commonly used in this document:

- EA – Environmental Assessment
- WVC – wildlife-vehicle collisions
- ITD – Idaho Transportation Department
- FHWA – Federal Highway Administration
- NEPA – National Environmental Policy Act
Revision History

- This Scoping Report was first published on the project website 1-17-18 (December 2017 cover date).
- February 2018 update: Six comment letters were inadvertently not included in Appendix B and one letter was not included in Appendix C. These comment letters were added to the document and scoping issues in Section 3.0 were updated. A paragraph was added to Section 2.2.7 regarding receipt of comments after September 2017 that are not included in this scoping report. A paragraph was also added to Section 3.0 regarding the purpose of identifying issues.
1.0 Introduction

The Federal Highway Administration (FHWA) and the Idaho Transportation Department (ITD) are preparing an Environmental Assessment (EA) to evaluate risks, benefits, opportunities, and costs associated with reconstruction of U.S. 20 in the Targhee Pass area (U.S. 20 between its junction with Idaho State Highway 87 and the Montana state line).

As an action using federal funds, the proposed project must comply with the National Environmental Policy Act (NEPA) of 1969, as amended. Scoping is part of the NEPA process. Scoping is an early and open process to identify issues of concern related to a proposed project. The objectives of scoping are to:

- Utilize stakeholder input in defining the set of alternatives and impacts that will be examined in detail in the EA.
- Give interested parties an opportunity to comment on the scope of the study and raise issues or concerns that should be addressed.
- Promote an efficient process by coordinating with resource agencies with jurisdiction or special expertise related to the project and project location.
- Reduce overall processing time by identifying relevant issues to study in the EA upfront and provide opportunity for early involvement to minimize the possibility that new issues will be raised later in the process.

This report documents the scoping and alternatives development process carried out by the study team. Outreach activities conducted with resources agencies, the general public, and a forum of stakeholder representatives are described in the following pages.

In addition to the summary of results, this report includes appendices containing all written public and agency comments received during the scoping and alternatives development phases of the EA process.

2.0 Scoping Process and Public Involvement

2.1 Internal Scoping

ITD utilizes Form 0654 at the start of the NEPA process to identify known issues that will be analyzed in the environmental document. ITD’s assessment also includes consideration of the appropriate Class of Action; ITD confirmed its decision to continue to prepare an EA. The completed form for the Targhee Pass project is included in Appendix A.

2.2 External Scoping

ITD employed a suite of public involvement methods to obtain public input regarding issues to be evaluated in the EA. Throughout phases of external scoping and alternatives development, ITD accepted comments by email, postal mail, and telephone. Hand-written comments were also accepted at public meetings. All communications with the public, organizations, and resource agencies are archived in a database that will be retained in ITD’s project record.
2.2.1 Situational Assessment: October 2017
At the request of the Idaho Transportation Department (ITD), The Langdon Group conducted a situational assessment for ITD’s Targhee Pass Environmental Assessment to inform the public outreach strategy for this study.

Assessment conversations occurred over the phone and in-person. Conversations were conducted informally allowing the stakeholders to drive the direction and discuss the issues that were most important to them. Interviews were not conducted using a specific set of questions asked of all stakeholders; therefore, the resulting summary does not provide quantifiable data, instead this report is intended to provide a window into the opinions, issues, and concerns that exist among a diverse sub-set of stakeholders. Interviews took place between October and November 2016. Assessment participants were identified by ITD and The Langdon Group. They included:

Federal Agencies
- U.S. Forest Service
- Federal Highway Administration
- National Park Service/Yellowstone National Park
- U.S. Fish and Wildlife Service

State Agencies
- Idaho Transportation Department
- Idaho Department of Fish and Game
- Idaho Department of Parks and Recreation

Local Governments
- City of Island Park
- Fremont County

Tribes
- Shoshone-Bannock Tribe
- Nez Perce Tribe

Other Organizations
- Greater Yellowstone Coalition
- Mitzi Rossillion Consulting (cultural)

The situational assessment assisted ITD in preparing internal scoping and in planning subsequent agency and public scoping efforts.

2.2.2 Agency and Public Scoping Meetings: December 15, 2016 (Island Park, ID)
Agency and public scoping meetings were held in Island Park, ID on December 15, 2016. Information provided included the study process, purpose, schedule, and geography of the study area. Preliminary statements of the project purpose and need were provided along with
descriptions of known issues to be evaluated. ITD solicited the public’s feedback on issues and concerns associated with the Targhee Pass segment of U.S. 20. Comments received during scoping are presented in Appendix B.

2.2.3 Alternatives Development Workshop: July 27, 2017 (Island Park, ID)
This public workshop consisted of several “information stations” with information on the EA process, timeline, and the EA’s updated Purpose and Need. Updated screening criteria for alternatives was also available for review. During this workshop, the public reviewed the materials and screening criteria, and then drew or commented on potential alternatives onto blank maps of the study area. Public comments from this meeting were included in overall scoping and considered as ITD developed alternatives. ITD accepted comments for another two weeks after this meeting. Appendix C presents comments received during and following this meeting. Appendix D presents written comments made on printed map comment forms during the July 27th public meeting.

2.2.4 Presentation of Alternatives Public Meeting: August 30, 2017 (Island Park, ID)
The purpose of this public meeting was to present the proposed EA alternatives. The three-hour public meeting included formal presentations at two separate times during the evening, with opportunity for questions and answers. Between presentations, members of the study team were available to provide information and answer questions about the EA. Appendix E presents written public comments received during the meeting and following the meeting. Appendix F presents verbal comments written on a flipchart during the August 30th meeting presentations.

2.2.5 Stakeholder Working Group and other Stakeholder Engagement during Scoping and Alternatives Development
To help Federal Highways Administration (FHWA) and ITD ensure that the EA is as inclusive and participatory as possible, ITD formed a Targhee Pass Stakeholder Working Group.

The Stakeholder Working Group is not a decision making body. Engagement as a participant in the Stakeholder Working Group is twofold:

1. Help ITD and FHWA by providing feedback that is representative of the diverse interests in the EA.
2. Share accurate information back out to respective constituencies about the EA.

The Stakeholder Working Group also helps communicate EA updates and milestones during phases of the EA when other broader public outreach is taking place. This is particularly helpful in the Island Park area with seasonal fluctuations in population and recreation activity. Representatives of governmental agencies are included in the Stakeholder Working Group to help inform ITD, FHWA, and other stakeholder participants of various regulatory requirements related to the EA. It is also helpful for these governmental representatives to hear public issues and concerns first-hand. Native American tribal representatives have also been included.

Stakeholder Work Group meetings to date have been:

- Agency/Stakeholder Working Group Meeting: July 18, 2017 (Island Park, ID)
- Agency/Stakeholder Working Group Meeting: August 28, 2017 (St. Anthony, ID)

ITD also met with residents of Big Horn Hills on September 29, 2017 at Big Horn Hills Estates. The purpose of the meeting was to review the EA process, discuss the EA alternatives, engage in dialogue specific to alternatives that would involve wildlife fencing, and to learn more about residents’ issues and concerns.

2.2.7 Website and Other Stakeholder Coordination

The EA website ([www.islandparkus20.com](http://www.islandparkus20.com)) and ITD’s website have been updated regularly throughout the process, and the public involvement team respond to inquiries through phone, email, and in-person visits as requested. All of these communications are documented in the project record.

Substantive comment letters received after September 2017 and before the EA document is released will be shared with the project team preparing the EA and will be included in the project administrative record.

2.3 Transcription of Comments for Inclusion in the Scoping Report

For purposes of this scoping report, comments pertaining to issues and alternatives were transcribed and numbered with personally identifying information (names and contact information) removed. In some cases, commenters identified themselves with an organization or governmental agency or referred to other representatives of organizations or agencies by name; that identifying information was included in the transcription. The project record database preserves all personally identifying information with the original comments.

3.0 Issues Derived from Scoping

The issues identified below represent common points in the broad spectrum of ideas submitted during the scoping and alternatives development phases of the Targhee Pass EA process. Reference to the transcribed text of comments received are indicated in parentheses, with letters referring to the Appendix of this scoping report in which the comments are located. Comment numbers are not given for purposes of quantifying the number of comments expressing a particular issue or the order of importance of that comment, but rather to provide cross-reference back to the original sources identifying each issue in the respective commenter’s own words.

Relevant issues for the EA are those which are:

- within the scope of the analysis;
- not decided by law, regulation, or previous decision;
- related to the decision; and
- amenable to scientific analysis rather than conjecture.

ITD’s conclusions regarding the issue topics are indicated for issue topics. The conclusions include ITD’s determination of issue relevance and indication of where in the EA document or elsewhere that relevant issues will be addressed.
The purpose of identifying issues is to determine the relevant issues to be evaluated in the EA. The number of comments identifying an issue does not influence the importance of the issue. Additionally it is not the purpose of scoping under NEPA to conduct a vote or referendum regarding the importance of issues. Comments expressing ideas regarding issues are accepted from anyone and multiple comments from single individuals expressing additional issues are accepted. Comment letters therefore do not constitute a representative sample of any population.

### 3.1 Issues Related to Project Purpose and Need

**Issue 1.** What are the road defects on this part of U.S. 20 that require improvement at this time? Will ITD provide information supporting the project needs in the EA? (B-3, 104, 106)

**Issue 2.** What can be done to improve safety in winter driving conditions? Icy conditions create a safety concern on this segment of U.S. 20, particularly shaded areas. (B-4, 8, 12, 99; C-103, 111, 115, 135; D-9; F-13)

**Issue 3.** Will ITD consider vehicle types (passenger cars, heavy trucks, recreational vehicles, etc.) and traffic volumes for this segment of U.S. 20 in determining the project needs? (B-4, C-107, D-3)

**Issue 4.** Will ITD address needs related to turning movements at Big Horn Hills Estates (existing and planned residential developments), Targhee Creek Road/Trailhead, and Howard Springs? Will ITD provide the public with information about the number of turning vehicles at key intersections? (B-8, C-106, 111, 140; E-11; F-12)

**Issue 5.** Will ITD address safety needs related to wildlife-vehicle collisions (WVC)? How big of a problem is this compared to other segments of U.S. 20 and other Idaho highways? (B-105; C-106; E-4, 8, 14, 18, 21)

**Issue 6.** Will ITD address safety needs related to passing? What criteria determines that a passing lane is needed? (B-11, C-111, 134, 135, 137, 167; E-11)

**Issue 7.** Will ITD address safety related to blind curves on Targhee Pass? (C-134, 135)

**Conclusions:** Issue statements 1-7 identify transportation issues included in the purpose and need and represent relevant and supportable reasons for ITD to take actions supported by the agency’s mission. These issues were also identified by ITD in preliminary needs assessments and planning leading up to the proposed project. Available data and planning goals/objectives supporting these needs will be summarized in Chapter 1 of the EA.

**Issue 8.** Will ITD incorporate needs for over/under passes for wildlife and/or best practices for wildlife crossing, as described in Idaho’s State Wildlife Action Plan, in the project purpose and need? (B-10, 101; C-143, 180, 181, 182, 184)
Issue 9. Will ITD incorporate the economic and cultural importance of wildlife to the unique character of the area in the project purpose and need? (B-4, 5, 10, 13, 16, 21, 23, 24, 25, 26, 65, 96; C-141, 149, 180, 182; E-46, 47, 55, 67-211)

Issue 10. Will ITD incorporate the importance of the Nez Perce Trail and other cultural resources important to Tribes in the project purpose and need? (B-10; C-182)

Issue 11. Will ITD incorporate consideration of the importance of safe wildlife passage between Yellowstone National Park and the Salmon-Selway-Bitterroot Wildlands Complex in central Idaho into the project purpose and need? (B-10; C-182)

Issue 12. Will ITD incorporate protection of terrestrial and aquatic habitat quality and connectivity into the project purpose and need? (B-10; C-182)

Issue 13. Will ITD incorporate mitigation of highway impacts to wildlife including protection of Tier 1 Species of Greatest Conservation Need into the project purpose and need? (B-10; C-182)

**Conclusions:** Issue statements 8-13 describe elements of the environmental context of the project that are relevant to other aspects of the EA process including consideration of design elements for alternatives, determination of issues for the impact assessment, and consideration of appropriate mitigation for project-level impacts, but are not transportation problems to be solved as part of the project purpose and need.

Issue 14. The statement of purpose and need should not specify particular solutions (C-180, 181, 182)

**Conclusions:** ITD agreed with these comments regarding the purpose and need statement as it was presented at public and stakeholder work group meetings in July 2017 and presented a revised purpose and need statement at August 2017 meetings and posted the revision on the project website.

Issue 15. Will ITD examine all of the available wildlife-vehicle collision data including data from the County Sheriff, Island Park Police, Idaho Fish and Game, and others? How will ITD address the concern that many wildlife collisions go unreported? (B-15, 16; C-184; E-33, 44, 54, 212)

Issue 16. Will ITD predict how wildlife-vehicle collision frequency will change with future traffic volume for the design year? (E-47)

**Conclusions:** ITD will utilize the best available data and research literature in determining the environmental context of the project. ITD will summarize data supporting the need to address wildlife-vehicle collisions in Chapter 1 of the EA.
3.2 Issues Related to Project Alternatives

3.2.1 Inclusion of Design Elements for Wildlife-Vehicle Collision (WVC) Reduction and Wildlife Movement

Issue 1. Will ITD include design elements to address wildlife movement and habitat use in the Targhee Pass area? (B-3, 5, 7, 10, 12, 13, 62, 70, 85, 86, 87, 93, 94, 99, 102; C-102, 127, 134, 143, 147, 149, 156, 158, 182)

Issue 2. Will ITD include wildlife crossings as a design element in project alternatives? (B-1, 2, 4, 6, 9, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 29-56, 57, 58, 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 88, 89, 90, 91, 92, 93, 95, 97, 98, 102, 105, 108; C-102, 108, 109, 111, 112, 113, 114, 116, 117, 122, 128, 130, 132, 136, 137, 138, 139, 140, 141, 142, 152, 154, 155, 156, 157, 161, 163, 164, 165, 166, 167, 172, 174, 175, 176, 177, 178, 179, 182, 183; D-1, 3, 6, 7, 8, 10, 12; E-2, 3, 5, 9, 10, 11, 12, 13, 15, 17, 19, 21, 22, 23, 24, 25, 30, 34, 45, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 67-211)

Issue 3. Would electronic devices to warn animals off the roadway be an effective way to reduce WVC? (C-102)

Issue 4. Would movement detection systems that warn drivers of wildlife in the roadway be an effective way to reduce WVC? (B-23, 57, 74, 89; C-135, 153; E-6, 38; F-18)

Issue 5. Would flashing wildlife warning signage be effective in reducing WVC, possibly presented in multiple languages, given presence of foreign visitor drivers in the Greater Yellowstone area (Eye-catching digital signage, possibly including recommended/variable speed reduction)? (B-107; C-103, 105, 124, 162, 166, 167, 168, 184; E-6, 16)

Issue 6. Would seasonal signage during times when wildlife are most active be an effective WVC reduction measure? (C-103, 153, 168)

Issue 7. Would reducing speed limit be an effective measure for reducing WVC (all the time or at night)? Also, possibly increasing fines in wildlife crossing areas? (B-4, 6, 9, 11, 13, 16, 21, 23, 27, 81, 90, 94, 107, 108; C-101, 107, 113, 132, 137, 153, 162, 170, 171, 172, 180, 184; E-14, 16, 28, 30, 38, 42, 63)

Issue 8. Would reducing the speed limit at places where animals cross be an effective WVC reduction measure, including driver warning of approaching crossings such as vibrating road units? (C-105, 160, 161, 184; E-6)

Issue 9. Would seasonal reductions in speed limit (spring/fall) help reduce WVC? (B-105; C-145, 153, 168)
Issue 10. Would increasing visibility (cutting back trees) be an effective measure for reducing WVC? (C-115, 142, 155, 160, 168, 171, 184; E-7, 13, 16, 20, 28, 36; F-13)

Issue 11. Can lighting be used in key areas to reduce WVC? (C-137)

Issue 12. Will ITD use previous studies of wildlife movement patterns and wildlife safety solutions to develop alternatives and evaluate impacts in the EA? (B-10; E-1, 37)

Issue 13. Would providing watering holes for animals on the side of the highway opposite to Howard Creek reduce the frequency of animal crossings (animals crossing the highway to get to the Creek) and the incidence of collisions? (E-1)

Issue 14. Does use of salt for deicing attract deer or cause deer to spend more time near the highway, causing greater WVC risk? Is there an alternative method of road deicing? (E-16).

Issue 15. Remove guardrails on both ends of Curve 4, level ground if necessary. Elk will not cross at guardrail [perception that elk get hit in this area because they will not jump the guardrail] (C-135; D-15, 16)

Issue 16. Will ITD consider an alternative involving not expanding U.S. 20 on Targhee Pass [not including a passing lane or wider shoulders], but instead only fix existing pavement deficiencies and then use available funds to build one wildlife overpass and fencing on Caribou-Targhee National Forest property? (B-10; C-182)

Issue 17. Would technologies such as vehicle collision avoidance systems and self-driving cars be an effective solution for wildlife-vehicle collision (WVC) reduction? Will these technologies render wildlife crossings and fencing obsolete in the future? (B-11, 103; C-135; E-16, 46; F-20)

Issue 18. Will ITD consider an alternative that does not include any WVC reduction measures or wildlife movement design elements? (E-45, 48; F-20)

Issue 19. Will ITD include fish/wildlife friendly culverts, underpass, or single span bridge where Howard Creek currently has culverts that do not provide passage? (B-10; D-3; E-26, 38, 62)

Conclusions: ITD will consider a range of alternatives for reducing WVC and will assess the effectiveness of alternative design elements for improving wildlife movement. Chapter 2 of the EA will include a discussion of alternatives considered but not advanced for detailed analysis.

3.2.2 Speed Limit

Issue 1. Would reducing the speed limit (all the time or at night) address all safety issues (visibility, turning traffic, tourist activity, ATV and snowmobile crossings,
WVC)? (B-6, 9, 10, 22, 24, 26, 65, 66, 92, 97; C-103, 107, 113, 114, 117, 118, 126, 135, 142, 143, 150, 151, 162, 178, 182; E-20, 26, 33, 43, 62, 67-211; F-22)

Issue 2. Will ITD consider increasing law enforcement patrol and/or fines for speeding? (B-10, 99; C-103, 104, 105, 120, 126, 129, 142, 160)

Issue 3. Will ITD consider installing cameras to monitor speed/issue speeding tickets? (C-107, 113, 139; D-9)

Issue 4. Will ITD consider lower speed limits for trucks, all the time or at night? (C-107, 110, 117, 142, 162)

Issue 5. Would slower speed limits for trucks increase dangerous passing situations? (D-9)

Issue 6. Opinion: Downhill traffic is too fast, often exceeds speed limit; slow uphill truck and RV traffic creates congestion and dangerous passing situations. (C-114; D-9)

Issue 7. Will ITD consider slower speed limits for winter driving conditions? (C-140)

Issue 8. Will ITD consider designing the road for slower speeds or with traffic calming measures and a reduced speed limit? (E-38, 44, 68-90, 92-211)

Issue 9. If ITD District 6 does not determine speed limits, to whom can citizens submit comments about reducing speed limits? (C-136, 150)

Conclusions: Highway speeds are set pursuant to Idaho Statutes (See Title 49-654 and 49-201(4) of the Idaho Statutes) which are outside the scope of this EA. However, consideration for variable night-time speeds and/or seasonality due to animal movement will be considered in the EA alternatives analysis.

3.2.3 Turning Traffic Movements

Issue 1. Will ITD include turn lanes at entrances to Big Horn Hills Estates? (B-8, 18; E-1)

Issue 2. Will ITD include turn lanes at Targhee Creek Road/Trailhead? (B-8, 13, 26; C-114, 151, 152; D-1, 2, 13; E-10, 15, 26, 35, 37, 38, 43, 53, 62, 67-211)

Issue 3. Will ITD include turn lanes at Howard Springs? (B-12; C-114, 151, 152; D-14; F-3)

Issue 4. Use of the Howard Spring area as a boat inspection station increases the volume of traffic turning in and out of this area. (B-99)

Conclusions: ITD assessed the need for turn lanes in its preliminary traffic assessment prior to initiating the EA process. Turn lanes were determined to be warranted to Big Horn Hills Estates entrances and at Howard Springs. A turn lane at Targhee Creek Road
has not been planned as a design component for this project and was not identified as a safety need in the corridor plan. Typically the volumes of traffic at these types of recreations access roads do not warrant turn lanes. The warrant for turn lanes at this site will be periodically reviewed by the District and will be examined during the alternative analysis for the EA. Issue 4: The Howard Spring area is no longer used by the Idaho Department of Agriculture for a boat inspection station.

3.2.4 Improved Signage

Issue 1. Please consider signage directing travelers to available facilities (bathroom) at Howard Springs. (B-8)

Issue 2. Stop sign at SH87/US20 Intersection is frequently ignored by southbound travelers on SH87. Would better signage warning people of the approaching intersection improve safety? (B-8)

Issue 3. Will ITD consider warning signage regarding winter driving conditions? (C-140)

Issue 4. If turn lanes cannot be added at Targhee Creek Road, will ITD provide better signage alerting drivers of the turn and potentially stopped traffic? (E-53)

Issue 5. Will ITD provide better signage for all intersections and pull-offs along the Targhee Pass segment of US-20 to better warn drivers of slower vehicles and turning movements? (F-9)

Conclusions: Improved signage can be provided independent of the EA process for this project; ITD will consider all of these suggestions for improved signage.

3.2.5 Frontage Road

Issue 1. Would ITD consider a frontage road for residences and cabins near the SH87/US20 Intersection? (B-8)

Conclusions: A frontage road is not planned for this section of U.S.20. Frontage roads are generally the purview of local road agencies and are more commonly implemented in conjunction with controlled access (i.e., 4-lane divided) highways.

3.2.6 Shoulders and Rumble Strips

Issue 1. Will ITD include wider shoulders as a safety improvement? (B-9; C-142, 154; E-36)

Issue 2. Will ITD install rumble strips to warn drivers of veering out of lanes? (B-99; C-142; F-11)

Conclusions: ITD is including these design elements for one or more build alternatives.

3.2.7 Pedestrians and Bicycles

Issue 1. Will ITD include improvements at the top of Targhee Pass for stopping vehicles and pedestrian crossing? Vehicles stop at the top of the pass/state line to take
pictures, people cross the road here, presenting a safety concern (B-12, 99; C-111, 114)

Issue 2. Will ITD consider moving the state line sign to Howard Spring (would this decrease the number of pedestrians at the top of the pass to take pictures)? (C-111)

Issue 3. Will ITD include a bike lane to improve safety for bicyclists? (B-18; C-136, 151)

Conclusions: Issue 1: The existing pullouts at the top of Targhee Pass are on the Montana side of the state line and are not within ITD’s purview to modify. These pullouts primarily exist to accommodate snowplow turnaround. ITD will coordinate with the Montana Department of Transportation in preparing this EA. Issue 2: ITD cannot move the state line signage to Howard Spring. The Howard Spring area and uses of that area are managed by the Forest Service. Issue 3: A separated bike lane is not planned for this segment of the U.S. 20 corridor. Other potential design elements to improve safety of pedestrians and bicyclists will be considered in the alternatives development process such as a wider shoulder.

3.2.8 Slower Moving Traffic, Passing, and Congestion

Issue 1. Will ITD include a climbing/passing lane with project alternatives? (B-14, 99; C-103; E-13, 15)

Issue 2. Will ITD include a shorter climbing/passing lane for only a portion of the Targhee Pass segment? (E-1, 26, 38, 62, 67-211)

Issue 3. Would climbing lanes in both directions create a safety hazard because of merging traffic in both directions at the top of the pass? (B-99; E-43)

Issue 4. Will the EA provide information explaining why a climbing lane is warranted, including supporting data? (E-43)

Issue 5. Will ITD consider installing more turnouts for slower moving traffic on U.S. 20, especially on the pass? (C-154)

Conclusions: A climbing/passing lane is planned for inclusion in one or more build alternatives. Issues 1-4: ITD’s traffic study found that a climbing/passing lane is warranted for the northbound direction for the entire segment evaluated (Mile Post 401.5 to 406.3). Because there are no major origin/destination points along Targhee Pass, the majority of traffic continues the entire length. Therefore, a segment without a passing lane would have the same failing level of service as the No-Action Alternative. Additionally, the Corridor Plan calls for providing alternating passing lanes (a 3-lane cross section) throughout the U.S. 20 corridor where a four-lane section is not warranted. The grade on Targhee Pass causes heavier vehicles to slow going over the pass; therefore, providing the climbing/passing lane in the northbound direction in the Targhee Pass segment would provide a safety benefit as well as a traffic flow benefit by reducing the occurrence of unsafe passing. Issue 5: Turnouts on U.S. 20 primarily exist for snowplow
turn-around areas and emergency breakdowns; turnouts are not effective for serving mobility needs or passing opportunity and do not reduce time spent following, rather platooning of vehicles behind slower vehicles is only resolved by the slow vehicle drivers voluntarily pulling off at the pull out. Slow moving trucks typically do not use these pull outs due to short lengths of most pull outs and they have a very difficult time accelerating on steep grades from a stopped condition, especially in icy conditions. Adding slow traffic pull-outs would not be expected to improve Level of Service and perhaps would reduce traffic safety.

3.2.9 Freight Traffic
Issue 1. Will ITD consider routing freight traffic to I-15 except for local deliveries? (B-6, 10, 15, 97; C-117, 118, 138, 139, 143, 159, 172, 182; D-9; E-54, 55, 62)

Issue 2. Would more active Port of Entry/truck weighing help reduce the volume of truck traffic on U.S. 20? (Belief that lack of enforcement may lead to over-weight or other violations on this route, contributing to volume of truck traffic and safety concerns.) (C-119, 120, 139, 151, 159; D-9; E-54)

Issue 3. Would reducing truck traffic be an effective measure in reducing WVC? (B-16, 105; C-107)

Issue 4. Will ITD consider prohibition of air breaks in the area to reduce noise impacts? (E-1)

Issue 5. Will ITD consider providing a pullout for chaining up on the Idaho side of Targhee Pass? (F-8)

Issue 6. Will ITD assess the need for a runaway truck ramp for the downhill segment of Targhee Pass? (F-10)

Issue 7. Will ITD consider a divided highway as a safety solution given the volume of truck traffic? (B-18)

Issue 8. If ITD District 6 does not make decisions about freight routes, to whom can citizens submit comments? (C-136)

Conclusions: Issues 1-3: Planning related to freight traffic is addressed in the State’s freight plan. Decisions related to freight routes are beyond the scope of the EA. Issue 4: noise ordinances are determined by local governments; this issue is beyond the scope of the EA. Issue 5: A truck chain up area is not planned for the current segment of U.S. 20 but may be considered for other segments outside of the project impact area to the south. Issue 6: A runaway truck ramp will be considered in the alternatives development process for the EA. Issue 7: A divided highway is not planned for this portion of U.S. 20 and was not recommended as necessary in the corridor plan. Issue 8: Information regarding the State’s freight planning process is available on ITD’s website (http://itd.idaho.gov/freight/).
3.2.10 Recreational Design Features

Issue 1. Will ITD consider providing a wider area near the intersection of U.S. 20 with Idaho 87 to better accommodate snowmobile trail grooming equipment? (B-19)

Issue 2. Would ITD include recreational crossings of U.S. 20 that are separate from wildlife crossings, or allow recreational use of wildlife crossing structures? (B-105; C-134, 182, 183; E-15, 26, 38, 58, 62; F-4, 15)

Issue 3. Will ITD consider a recreational trail between the Continental Divide Trail and the Targhee Creek Trail so that recreational users such as bikes and horseback riders do not try to use the highway shoulder to complete loops between these trailheads? (C-183; E-38; F-16)

Issue 4. Will ITD consider providing parking for Nordic skiing access at Targhee Creek Road/Trailhead? (D-1)

Conclusions: Issue 1: ITD currently provides a permit to Fremont County for use of portions of the right-of-way for a snowmobile trail. ITD will coordinate with Fremont County on an on-going basis regarding the snowmobile trail independent of the EA process. Issues 2: Recreational crossings will be considered in the alternatives development process for the EA. Issue 3: Trails separated from the highway are not under ITD’s responsibility. With a widened shoulder, there would be better opportunity to ride bicycles on a segment of the highway. Issue 4: Targhee Creek Road is a Forest Service facility, this issue is beyond the scope of the EA.

3.2.11 Cost, Funding, and Procedural Issues for Alternatives

Issue 1. Is funding reasonably available for implementing wildlife solutions? Would funds allocated for transportation projects (gas tax) be used for wildlife crossings? Are there other funding sources available for wildlife crossing design elements? Do funds spent on wildlife elements take away from available funds for transportation improvements? (B-10, 107; C-121, 160, 168, 169, 170, 171; E-22, 24, 27, 28, 33, 41, 48, 64; F-1)

Issue 2. Will ITD consider public-private partnerships or private funding sources to fund wildlife crossing solutions? (B-103, 109; C-146; D-11; E-38)

Issue 3. Will ITD assess the cost effectiveness of wildlife crossings and fencing? What are the long-term maintenance costs and who would be responsible for maintenance? (B-94, 107; C-131, 133, 153, 168, 184; E-1, 7, 16, 18, 25, 28, 33, 38, 48, 57; F-1, 21)

Issue 4. Will ITD lobby insurance companies to help pay for wildlife crossings? (C-142)

Issue 5. Will ITD engage local outdoor recreation businesses (ATV, snowmobile, and hikers) in the process of designing wildlife and recreation design elements for alternatives? (C-121, 123)
Issue 6. If constructed, would wildlife fences stand up to snow removal along this segment of the corridor? (E-1, 18, 20)

Issue 7. Will ITD coordinate with Montana Department of Transportation to extend wildlife fencing on the Montana side of Targhee Pass? (E-22, 58)

Issue 8. Will ITD consider implementing temporary WVC mitigation methods while securing funding for wildlife crossing structures, and during construction? (E-22)

Issue 9. Will ITD coordinate with entities such as the Western Transportation Institute to bring additional funds to the project, consider innovative wildlife crossing designs, and to provide comparative research? (E-38)

Issue 10. Will ITD provide a cost comparison of the project alternatives? (E-20)

Issue 11. Will ITD provide a safety improvement comparison of the project alternatives? (E-20)

Issue 12. Will ITD provide a comparison of the effectiveness of each alternative in reducing WVC? (E-25)

**Conclusions:** These are relevant issues regarding the reasonableness and feasibility of design elements and the comparison of alternatives that ITD will consider and describe in the EA process.

Issue 13. Do design elements for wildlife that are included in project alternatives comply with the rescinded U.S. Department of Interior’s Secretarial Order 3330? (E-48)

**Conclusions:** Secretarial Order 3330 was revoked by Order 3349. These are U.S. Department of the Interior directives and are not germane to Federal Highway Administration procedures. No elements of the proposed action stem from or relate to these U.S. Department of the Interior directives. There is reference to “landscape scale mitigation” in these directives associated with activities pursued by the Department of Interior and several other Federal agencies not including the Federal Highway Administration. With respect to ITD’s role in preparing the Targhee Pass EA, land use planning and landscape scale conservation/mitigation are beyond the scope of ITD’s mission and are not part of the Targhee Pass project. Wildlife-vehicle collisions present safety issues for the traveling public as well as contributing to mortality of wildlife. ITD’s interest and motive in considering design elements to address wildlife-vehicle collisions and to improve wildlife movement at Targhee Pass stem from well-established and documented transportation effects of highways on wildlife and from successful implementation of measures to reduce these effects in other locations in Idaho and in other states that have been implemented by state transportation departments. Additionally, ITD has a Memorandum of Understanding with the Idaho Department of Fish and Game to collaborate on a project-by-project basis in achieving their respective agency missions. The Idaho Department of Fish and Game’s (IDFG) interest in
collaborating with ITD as described in the MOU stems from IDFG’s mission to preserve, protect, perpetuate, and manage the fish and wildlife populations of the state.

### 3.3 Issues Related to Public Involvement and the NEPA Process

**Issue 1.** Concerns about time of year that meetings are held and opportunity to comment. (B-3, 4, 28, 107; C-103, 140; E-20, 49, 66)

**Issue 2.** Concerns regarding the influence of non-governmental organizations on the selection of alternatives, influence over the decision process, and perceived conflicts of interest and/or opportunity for local government and citizens to be involved. How will the EA document agency and public involvement in the EA process? (B-28, 107, 109; C-105, 184; E-31, 32, 33, 49, 51, 66)

**Issue 3.** Will ITD obtain public input regarding the location of wildlife fence included with any alternatives, such as consideration of fence in front of or behind homes at Big Horn Hills Estates? (F-14)

**Issue 4.** Will ITD prepare an Environmental Impact Statement for this project? (C-184; E-40, 45, 49)

**Issue 5.** Will ITD engage the National Park Service as a cooperating agency? (B-94)

**Issue 6.** How will ITD involve local governments (Fremont County and Island Park City) in the NEPA process? (C-184)

**Issue 7.** How will ITD involve Native American Tribes in the NEPA process? (C-184)

**Issue 8.** What documentation of public involvement during the NEPA process will be provided? (C-184)

**Conclusions:** Issues 1-2: In the EA process, ITD has held multiple public meetings and is issuing press releases and providing a variety of ways and times of year that the public can seek information and provide comments. Numerous comments have been received from the Island Park community, local governments, state and federal agencies, Native American tribes, non-governmental organizations, and the general public, with comments representing a broad range of interests and concerns. All comments are given equal consideration. Issue 3: ITD will meet with landowners during the development of alternatives involving wildlife fencing. Issue 4: ITD has discussed the Class of Action with FHWA and decided to proceed with preparing an Environmental Assessment. Issues 5-8: Cooperating agencies are generally only identified for an EIS. While no agencies have been identified as cooperating agencies in preparing the EA, numerous federal, state, and local agencies and Native American tribes have been invited to attend meetings and provide comments, including representatives the National Park Service (Yellowstone National Park). The EA document will include a detailed summary of public involvement and agency consultation during the EA process.
3.4 Issues Related to U.S. 20 Corridor or Segments other than Targhee Pass

Issue 1. Will ITD consider stop lights at Elk Creek Station and Robin’s Roost? (B-9)

Issue 2. Will ITD consider reduced speed limits throughout US-20? (B-15; C-104, 159, 160, 172; E-2, 7, 13, 19, 37)

Issue 3. Will ITD maintain existing reduced speed limits in business areas? (C-104)

Issue 4. Will ITD maintain public accesses for recreation, hunting, fishing throughout the US-20 corridor? (C-104)

Issue 5. Would improvements to I-15 reduce truck volume on US-20? (C-110)

Issue 6. Will ITD consider lower speed limits in Pinehaven area (Riverside Campground to Osborne Bridge)? (C-119, 138)

Issue 7. Will ITD consider reducing the speed from Last Chance to Targhee Pass? (C-125)

Issue 8. Could individuals be allowed to collect firewood along US-20 from Ashton Hill to Targhee Pass within a certain distance of the highway, creating a visibility clear zone to reduce wildlife-vehicle collisions? (C-142, 155)

Issue 9. Will ITD consider installing roundabouts at Yale Kilgore and Elk Creek? (C-142)

Issue 10. Will ITD consider signage telling drivers to “stay right unless passing” in passing lane areas, possibly in multiple languages? (C-142)

Issue 11. Will ITD consider a speed limit from Chester to Ashton not greater than 65mph? (C-148)

Issue 12. Will ITD consider a lower speed limit on south side of Ashton? (C-154, 155)

Issue 13. Will ITD consider road improvements for other segments of US-20 or entire corridor? (C-155; E-7, 16, 18)

Issue 14. Will ITD consider wildlife crossings for other segments of the US-20 corridor? Will impacts to wildlife in other segments of the corridor be evaluated? If wildlife design elements are considered for other segments of the corridor, will ITD consider options other than wildlife crossing structures and fence? (B-63, 64, 65, 103, 107; C-184; E-33, 37, 54, 56)

Issue 15. Opinion: Don’t see need for improvements to SH-87. (C-173)
**Conclusions:** These issues are beyond the scope of the Targhee Pass EA. The study team will share these issues with the US 20 Corridor planning team and the appropriate land management agencies.

### 3.5 Noise Impact Analysis

**Issue 1.** Would the proposed project be consistent with ITD’s noise abatement policy? Will noise impacts to sensitive receivers be evaluated? (A-ITD Form 0654; B-102; C-162, 184; F-7)

**Conclusion:** This is a relevant issue because there are residences located near the Targhee Pass segment of the corridor (sensitive receivers). Project alternatives which involve the addition of a through-traffic lane require evaluation of traffic noise impacts. Therefore, a noise study will be conducted.

### 3.6 Cultural Resources

**Issue 1.** Do protected cultural resources occur within the project area and would any be adversely affected by the project? Would wildlife crossing structures and fencing alter the movement patterns of wildlife, causing adverse effects to any cultural or historic resources? (A-ITD Form 0654; C-184)

**Issue 2.** Will historically eligible resources be avoided? (C-184; E-33)

**Issue 3.** Will ITD consult with Native American tribes and other parties with an interest in cultural resource preservation such as the Island Park Historical Society? (B-86; C-184; E-33, 66)

**Conclusions:** ITD will evaluate cultural resource impacts in the EA process and will consult with Native American tribes as required by the National Historic Preservation Act and other applicable laws. Coordination requirements will be determined in consultation with the Idaho State Historic Preservation Officer. ITD has included the Nez Perce and Shoshone-Bannock Tribes in scoping and alternatives development as described in Section 2.2. Chapter 4 of the EA will document consultation and coordination that occurred during the EA process.

### 3.7 Wildlife and Fisheries Impact Analysis Issues

#### 3.7.1 Impacts on Wildlife

**Issue 1.** Will ITD evaluate the effects of the highway and the project alternatives on wildlife? Would increasing road width increase habitat fragmentation and/or habitat degradation effects such as introduction or spread of invasive species? (B-11, 16, 66, 102, 107; C-184; E-25, 29, 37)

**Issue 2.** Would projected traffic volume, speed, and design elements of the highway represent a permanent barrier for wildlife movement through and within the Targhee Pass area? (B-10, 102)
Issue 3. If road improvements allow for increased traffic speeds would this increase risk of wildlife-vehicle collisions? (B-13)

Issue 4. Are wildlife more actively crossing the road in spring and fall? (C-105)

Issue 5. Would fish passage or aquatic habitat be affected by implementation of the project? (B-10, 102; D-3; E-25)

Issue 6. Would the project adversely affect Forest Service special status species or state listed species of concern? (ITD scoping, B-102)

Issue 7. Will ITD comply with the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act? (B-102)

Issue 8. Will the impact analysis address the importance of the Targhee Pass area to wildlife? (C-180)

Issue 9. Will the impact analysis address potential effects of climate change on wildlife movement? (C-180)

Issue 10. Would wildlife fencing and crossings change how wildlife use and migrate through this area, possibly adversely? Would crossing structures facilitate predation? (B-107; C-153, 171, 184; E-28, 33)

Issue 11. Would wildlife fencing pose a hazard to birds such as sage grouse that fly low to the ground and are adversely affected by other types of fences? (E-65)

Issue 12. Would wildlife design elements change how wildlife are managed, would this create additional needs/costs for wildlife law enforcement? (C-184)

Conclusions: These issue statements identify relevant issues for the wildlife impact analysis in the EA.

Issue 13. Existing cattle fencing in vicinity of SH87/US20 is difficult for elk calves to navigate (D-5)

Conclusions: This issue is beyond the scope of the EA.

3.7.2 Effectiveness of Wildlife Crossing and Fencing

Issue 1. Would crossing structures be effective in reducing WVC? (B-107; E-7, 20, 25)

Issue 2. Is the Targhee Pass area a wildlife migration corridor and is this the most appropriate location in the general area for considering wildlife crossings? (B-28, 104, 106, 184)

Issue 3. Would fencing/crossings be needed on SH87 also? (D-5)
Issue 4. Would effectiveness of fencing be compromised by the high volume of snow we receive in winter? (C-145, 184; F-19)

Issue 5. If recreational access gates were installed in a wildlife fence, would the effectiveness of the fence be compromised if gates are left open? (E-42)

Issue 6. Will ITD consider lessons learned in other locations regarding wildlife crossing effectiveness in developing wildlife crossings for Targhee Pass alternatives? (F-6, 17)

Issue 7. Would wildlife crossing structures primarily be for elk spring and fall migration? (C-184)

Issue 8. Would elk be hazed or otherwise directed to crossing structures? (C-184)

Conclusions: ITD will utilize the best available research and data regarding wildlife crossings and fencing for the preliminary design and will provide an analysis in the EA as well as a comparison of alternatives.

3.8 Threatened and Endangered Species

Issue 1: Will the EA address impacts to listed species? (A-ITD Form 0654; B-102)

Conclusions: This issue statement is relevant to the analysis to be provided in the EA. ITD and FHWA will complete Section 7 consultation with the U.S. Fish and Wildlife Service.

3.9 Land Use and Property Acquisition

Issue 1. Would wildlife crossings and fencing or other project elements require property acquisition or easement on private land? (B-11, 107; C-184)

Issue 2. Would wildlife fencing adversely affect private land access? (C-184; E-33)

Issue 3. Are project alternatives consistent with local land use planning by Fremont County and Island Park City? (A-ITD Form 0654; B-11; C-184; E-48)

Issue 4. Would wildlife crossings and fencing lead to other subsequent land use changes/prohibitions on private and/or public land use on the local scale or larger regional or national scale? (B-28, 107; C-105, C-184; E-21, 28, 31, 32, 33, 39, 41, 48, 66)

Issue 5. Would wildlife crossing structures or fencing or any other project design elements violate airspace requirements near an airport? (A-ITD Form 0654; C-184)

Conclusions: These issues are relevant to ITD’s development of alternatives and the impact analysis to be completed for the EA.
3.10 Visual Impact Analysis Issues

Issue 1. Will changes to the roadway be consistent with visual management objectives for Targhee National Forest? (A-ITD Form 0654; C-184; F-2)

Issue 2. Would wildlife crossings and fencing or other alternative design elements adversely affect visual resources? (B-11, 107; C-170, 184; E-33; F-2)

Conclusion: These issue statements identify relevant issues for the impact analysis.

3.11 Floodplains

Issue 1. Will the EA address impacts to floodplains? (A-ITD Form 0654; B-102; C-184)

Conclusions: Floodplain impacts are a relevant regulatory issue to be addressed in the impact analysis.

3.12 Wetlands, Riparian Areas, and Stream Alteration

Issue 1. Will the EA address impacts to wetlands? (ITD Form 0654, B-102)

Issue 2. Would wildlife overpasses impact wetlands or riparian areas? (D-4; C-184; E-33)

Issue 3. Would any project design elements require a stream alteration permit? (A-ITD Form 0654; C-184)

Conclusions: These are relevant issues to be evaluated in the EA.

3.13 Aquatic Resources and Water Quality

Issue 1. The EA should address impacts to aquatic resources including water quality. (A-ITD Form 0654; B-102; C-184)

Issue 2. If channel impacts are unavoidable, channel changes should be planned and designed to simulate natural stream channel dimensions and functions (B-102)

Issue 3. The EA should identify all Source Water Protection Areas, activities that could potentially affect source areas, potential contaminants, and measures to protect source areas (B-102; C-184)

Issue 4. Will the EA incorporate best management practices for water quality? (E-33)

Conclusions: These issue statements identify relevant issues for the impact analysis.
3.14 Invasive Species

Issue 1. Will ITD include best management practices to prevent the introduction and spread of invasive species and noxious weeds? (A-ITD Form 0654; C-184)

Conclusions: This is a relevant issue to be addressed in the EA.

3.15 Recreation Resources

Issue 1. Would public land access be reduced as a consequence of wildlife crossings/fencing? (B-107; C-104, 112, 144, 153, 170, 184; E-16, 18, 28, 35, 57)

Issue 2. Will the EA evaluate effects of alternatives on recreation resources and travel in the area? (C-184; E-38)

Issue 3. Would wildlife fencing interfere with existing snowmobile access and travel patterns? (E-1, 4, 34, 35)

Issue 4. Would recreational underpasses also benefit wildlife if installed? (E-38)

Issue 5. What effects would wildlife overpasses/underpasses and fencing have on hunting opportunity? Would animals be concentrated spatially or be “funneled” toward crossings? Would areas currently open to hunting have to be closed or in some way modified? (B-11, 28, 100; C-160; E-16, 34, 41)

Issue 6. Are there any resources protected under Section 4(f) (public parks, recreation areas, trails, wildlife/waterfowl refuges, wild or scenic rivers, historic sites/bridges, archaeological resources) or Section 6(f) (Land and Water Conservation Fund recreation areas)? (A-ITD Form 0654)

Conclusions: These issue statements identify relevant issues to be addressed in the EA. The Howard Spring area may constitute a public recreation resource under Section 4(f). There are no Section 6(f) recreation areas in the project area.

3.16 Air Quality

Issue 1. Will the EA address impacts of project-related air emissions? (A-ITD Form 0654; B-102).

Conclusions: The project is not located in a non-attainment area. Emissions from project construction would be temporary. This issue will not be evaluated in the EA.

3.17 Social and Economic Impacts and Environmental Justice

Issue 1. Would any project alternatives involve residential or commercial relocations, private property acquisition, or neighborhood effects? (A-ITD Form 0654)
Issue 2. Would any project alternatives cause economic disruption or changes in demand for services? (A-ITD Form 0654; C-184)

Issue 3. Would wildlife crossing structures create additional tourism and demand for local services related to tourism? Would there be associated local economic effects such as price of housing? (C-184)

Issue 4. Would wildlife crossing structures affect oversize load routes and the cost of transportation for hauling large loads? (C-121, 153; F-5)

Issue 5. Would wildlife crossing structures affect public schools, children’s play areas, bus routes/stop locations? (C-184)

Issue 6. Would wildlife crossing structures and fencing cause wildlife species like elk and bison to be more concentrated in space, resulting in greater disease occurrence (brucellosis) and subsequent transmission risks to livestock and/or humans? (C-184)

Issue 7. Would wildlife crossing structures and fencing cause wildlife to be more concentrated in space, resulting in nuisance effects to local residents (concentrated odors, animal waste)? (C-184)

Issue 8. Would project alternatives result in disproportionate adverse effects or unequal distribution of benefits for any minority or low income populations? (A-ITD Form 0654; C-184)

Issue 9. Would wildlife design elements increase law enforcement needs and costs? (C-184)

**Conclusions:** These are relevant issues to be considered in determining the feasibility of alternatives and/or to be addressed in the EA impact analysis.

**3.18 Construction Impacts**

Issue 1. Would access to Big Horn Hills Estates be impacted during construction? (A-ITD Form 0654)

Issue 2. Would construction cause any disruption in utility services to local residents and businesses, for example, if powerlines need to be moved? (C-184)

Issue 3. What effects would project construction have on employment and local economic activity? (C-184)

Issue 4. Would project construction require a stormwater general permit? (A-ITD Form 0654)

**Conclusions:** These are relevant issues to be addressed in the EA.
3.19 Utilities

Issue 1. Would any design elements of project alternatives affect utilities (electric, sewer, pipelines, septic systems, waste water disposal systems)? (A-ITD Form 0654; C-184)

Conclusions: These are relevant issues to be addressed in the EA. No impacts to public or private utilities are expected for any project alternatives.

3.20 Hazardous Materials and Waste

Issue 1. Would previously contaminated soils be encountered during construction? (A-ITD Form 0654; C-184)

Conclusion: This is a relevant issue to be addressed in the EA.

3.21 Soils and Geology

Issue 1. Are there prime or unique farmlands that would be affected by the project? (A-ITD Form 0654)

Issue 2. Are there any geotechnical constraints for design elements of project alternatives? (faults, unstable soils or slopes, groundwater, etc.) (C-184)

Conclusions: There are no designated protected farmlands in the project area based on ITD’s review of soil surveys published by the Natural Resources Conservation Service. Geotechnical investigations were conducted to evaluate the feasibility of project alternative design elements. Geotechnical feasibility will be summarized in the EA.

3.22 Transportation, Traffic and Safety

Issue 1. Would the project involve any changes in access or access control or changes in travel patterns? (A-ITD Form 0654)

Issue 2. Would wildlife crossing structures increase driving hazards such a reducing sight distance or causing wind currents or drifting snow? (C-184)

Issue 3. Would wildlife crossing structures present any unique traffic volume/flow issues? Would presence of these structures increase traffic volume? (C-184)
Issue 4. Would wildlife crossing structures adversely affect movement of pedestrians and bicycles along the highway? (C-184)

Issue 5. Would wildlife crossing structures require lighting and/or cause glare? (C-184)

**Conclusions:** These are relevant issues to be considered in determining the feasibility of alternatives and/or to be addressed in the EA impact analysis.
Appendix A

ITD Form 0654
## Environmental Evaluation

**Key Number** 14054  
**Project Number** SHS  
**Program** Pavements Restoration  
**Project Name** Jct SH 87 to Montana State Line (Targhee Pass)  
**Date** 10-13-2016

<table>
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<th>District</th>
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<th>Route Number</th>
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<th>Ending Milepost</th>
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<td>406.3</td>
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### Acres of New Public R/W
- None

### Acres of New Private R/W
- None

(Discuss the existing use of R/W to be acquired, plus adjacent land use, zoning, development plans, etc. on attached Environmental Summary Sheet)

### Tribal Impact
- Cultural
- Archeological
- Reservation
- None
- Yes
- No

### Public Interest Expected?
- Yes
- Yes
- No

### Air Quality
- CO
- PM
- Exempt Project
- Yes
- No

### Type One Project (i.e., New Location, Substantial Alignment Change, Addition of a Through-Traffic Lane)
- Yes
- No

### Construction Impacts Requiring Special Provisions (Enter Details on Reverse Side)
- Yes
- No

### Program Year
- ADT 3414
- DHV 805
- % Trucks 16.5
- Posted Speed 65

### Design Year
- ADT 4877
- DHV 1121
- % Trucks 16.1
- Posted Speed 65

### Distance of Nearest Noise Receptor to Centerline
- Existing 120ft.
- Proposed 120ft.

### Project Purpose and Benefits

**Double mark (xx) only the item that best describes the Primary Reason for Proposing this Project**

**Single mark (x) all Other Relevant Items**

- Maintain/Improve User Operating Conditions
- Enhance Accessibility for the Disabled/Safety
- Maintain/Improve Traffic Flow
- Enhance Pedestrian Safety and/or Capacity
- Time Savings
- Enhance Bicycle Safety and/or Capacity
- Increase Capacity
- Traffic Composition Enhancement (e.g., Truck Route, HOV Lane, Climbing Lane)
- Reduce Congestion
- Visual/Cultural Enhancement (e.g., Landscaping, Historic Preservation)
- Reduce Hazard(s)
- Environmental Enhancement (e.g., Air Quality, Noise Attenuation, Water Quality)
- Reduce Highway User Operating Costs
- Economic Prudence (e.g., Repair Less Expensive than Replacement, B/C Ratio)
- Other, List (e.g., Driver Convenience and Comfort regarding Rest Area Projects)

### Check Any of the Following That Require Avoidance, Minimization, or Discussion (If Yes, describe in the Environmental Document or CE)

1. Noise Criteria Impacts*
2. Change in Access or Access Control
3. Change in Travel Patterns
4. Neighborhood or Service Impacts
5. Economic Disruption
6. Inconsistent W/Local or State Planning
7. Minorities, Low Income Populations
8. Displacements*
9. Section 4(f) Lands-DOT Act 1966* (i.e., Public Parks/Rec Areas/Trails, Wildlife/Waterfowl Refuges, Wild or Scenic Rivers, Historic Sites/Bridges, Archaeological Resources
10. LWCF Recreation Areas/6(f) Lands*
12. FAA Airspace Intrusion**
13. Visual Impacts
14. Prime Farmland*, Parcel Splits
15. Known/Suspected "Hazmat" Risks
16. Wildlife/Fish Resources/Habitat**
17. Threatened/Endangered Species*
18. Air Quality Impacts
19. Inconsistent With Air Quality Plan
20. Stream Alteration/Encroachment**
21. Flood Plain Encroachment*
22. Regulatory Floodway
23. Navigable Waters**
24. Wetlands*
25. Sole Source Aquifer
26. Water Quality, Runoff Impacts
27. NPDES-General Permit

*If yes to these items, supplemental reports or documentation are required (e.g., Relocation Report; Wetlands Determination/Finding; Fish and Wildlife Species List Update; SCS Form AD-1006, Biological Assessment, etc.)
**If yes to these items, a letter of input is required from the appropriate agency.**

### Recommendation

- A. The project does not individually or cumulatively have a significant adverse effect on the human environment (Categorical Exclusion) ☑ 23 CFR 771.117(c), i.e., Type 1 - ITD Approval
- ☑ 23 CFR 771.117(d), i.e., Type 2 - Programmatic - ITD Approval
- ☑ 23 CFR 771.117(d), i.e., Type 3 - FHWA Approval
- ☑ B. There is insufficient information to support A above or no precedent exists. (Environmental Assessment)
- ☐ C. The project will result in a significant effect on the human environment. (Environmental Impact Statement)

**Prepared By (Consultant, District Environmental Planner, or LHTAC Signature*) Date**

**Reviewed By (District Environmental Planner, Project Development Engineer, or LHTAC Signature*) Date**

*One Signature by a Planner and one by Engineer or Consultant*

### Construction Impacts Requiring Special Provisions

ITD anticipates that its Programmatic Biological Assessment (BA) can be applied to this project to avoid adverse effects to threatened and endangered species; Best Management Practices from the Programmatic BA will be incorporated in the EA avoidance and minimization measures.

### Project Description (if not attached)

From Project Charter 10-12-2016:

Development Phase: The purpose of the Jct. SH 87 to Montana State Line project is the life cycle restoration of US 20 between mileposts 401.5 and 406.3; to restore foundation structural integrity, pavement condition, and drainage. Safety and traffic flow improvement will also be addressed by this project. Due to funding limitations, phased construction over two years will likely be done in 2020 and 2021. The project design and environmental process will be done as a single project and will not be phased.

The roadway, in service for 57 years, is beyond the expected life cycle of 40 years. Ballast materials are aged; surface and subsurface drainage is failing, evidenced by frost heaves and pavement cracking. Normal preventative pavement treatments to maintain ride and pavement integrity fail early due to the worn out foundation section. To maintain the roadway surface in a cost effective manner the roadway ballast and surface need restoration.

Traffic and safety studies showed a need for construction of a climbing lane to allow safe passing of slow vehicles for uphill traffic. Construction of left and right turn bays/lanes at three locations were also identified. Hazards associated with wild animal collisions, particularly at three major crossing areas warrant an appropriate level of mitigation.
Appendix B
Public and Agency Comments
December 2016-June 2017
<table>
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<th>Comment</th>
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<td>Please consider a wildlife overpass for the proposed Targhee Pass construction. Personally, I have had a moose come right into the roadway while going over the pass, fortunately, avoided a collision. As a physician who did ER for 15 years in SE Idaho, I have seen my share of vehicle-wildlife collisions where neither the human occupants nor the wildlife were as fortunate as me. And as someone who enjoys observing the wildlife, would like to see a means of safe passage for the deer, elk &amp; moose.</td>
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<td>We live just near the intersection of highway 20 and highway 87, so we take 20 into West Yellowstone nearly every day, and we applaud your efforts to make that stretch of the highway safer. Whichever plan you choose, please include components for wildlife corridors too. There are so many accidents involving animals on that part of the highway, as we can attest to since we have seen many of them ourselves, especially near MM 403. It would definitely add to the safety of that road if there were places where animals could pass over without endangering motorists. Thank you for considering our comments.</td>
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<td>I have received from a friend notice of a public comment meeting to be held on December 15th regarding work which is contemplated on Highway 20 between Highway 87 and the Montana state line. I am a homeowner at Henry’s Lake, and I am very concerned that this public meeting is taking place at a time when many homeowners aren’t even in the area to provide their input or give feedback in real time. There are many questions that concern me. First, is this being done in conjunction with the same type of improvement to occur on the Montana side? How has it been determined that the Idaho side needs fixing? I myself am not aware of any glaring road defects. If this is to address both motorist and wildlife safety, what is being contemplated to keep the wildlife off the road (as I believe many accidents are wildlife related, causing high mortality rates of wildlife). What are the numbers as to accidents—motorist or wildlife caused? Over what period of time? How will traffic be affected? Everyone at Henry’s Lake travels over the pass to West Yellowstone for groceries, access to the park, entertainment, etc. Not only will they be affected, but all of the traffic coming from Idaho Falls will also get backed up. This will create a serious bottleneck, there is no way around, unlike much of the past roadwork down by Ashton. The biggest question in my mind is this: Is the cost to the state and the people worth the benefit? Unless serious steps are taken to keep the animals off the road with safe passage corridors, the work to be done sounds more like some boondoggle than a serious attempt to resolve a problem. And the timing of this meeting leaves grave doubts in my mind that this is a serious attempt for getting real public input. Come out into the light and have the meetings in the summer, to get the real input that such a huge undertaking deserves, in furtherance of your deliberations. Thank you for your consideration of my request and questions.</td>
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| My husband and I live in Island Park at Henrys Lake. We will be unable to attend the public information meeting on Dec. 15th. I realize you have a timetable to meet in your planning stages that will keep the project on track for completion by 2021, but you should be aware that 75% or more of the drivers who utilize this very busy roadway as an access to summer homes, recreation and Yellowstone Nat Park are a very important component of the users who are benefited by improvements in this road, and injured on the road as well due to existing conditions, and wildlife movements across important corridors for their survival. So this public comment period could not come at a more terrible time to limit the comments that may be very important to your planning process. That said, my family and neighbors travel that stretch of road frequently during the months March through November. There are times, even in these seasons that the road is icy or snow laden. It is well known as a problem area for the large number of accidents that occur on that stretch as opposed to other areas in IP. The large amount of traffic, the curves, speed limits of 65 Idaho and 70 on the Montana side, and the areas that may be continually shaded during the day, therefore icy all contribute to issues on this roadway. A large concern of ours is the wildlife vehicle collisions (WVCs) that are responsible for a large majority of traffic accidents on this stretch. It is a migration corridor for deer, elk, wolverine, moose, and is frequently traveled by black and grizzly bear and mountain lion as
well. To dramatically reduce the traffic accidents, it is imperative that you reduce the opportunity for drivers to meet wildlife crossing the road. The most effective way to do this is to build into the roadway either underpasses or overpasses at appropriate intervals, along with restrictive fencing to steer wildlife to safe areas to pass. The cheapest opportunity to do this is when the road is already being remodeled due to other needs, such as this project. Up to 90% of WVCs, and therefore accidents that can be deadly or injurious, is to provide safe passage for wildlife in the road building plan. The wildlife in our area that come through our areas (the entire Island Park caldera and the Henrys Lake basin) are traveling to and from YNP to the Henrys Lake Mountains and or the Centennial Mountains. Some moose are resident and pass frequently in their daily meanderings. They are not only a safety factor on the roadways, and a state “treasure” that most states in the nation do not have, but they have a significant economic impact on the welfare of the state in the form of hunting and fishing opportunities and vacationers to the entire region, and especially YNP. The associated businesses in the area exist because of these recreation opportunities, and wildlife viewing is an essential part of that experience. I am aware that ITD paid a significant amount of money to have wildlife travels and crossings of Hwy 20 (elk and moose) studied and mapped. In addition, ITD has hired a roadway ecologist with vast experience in designing roadways to significantly reduce/eliminate WVCs and provide for safe wildlife passage while building better, safer roadways for all travelers, not just the few who may be able to attend a public information meeting in December. I urge you to carefully consider the data that you have so diligently solicited via the studies and reports you have commissioned. Safe wildlife passage is an opportunity for ITD, in this particular stretch of highway 20, that will never be more cost-effective than it is which this rebuild, now. The entire Island Park Corridor needs attention in this, as there are many hotspots that should be mitigated, but the time for this section is now. My last point is that in making recommendations to reduce WVCs, frequently “traffic calming” suggestions are made that involve lowering speed limits and enforcement. Please remember that this route of Hwy 20 in IP to Hwy 87 going N, eventually to Hwy 90 in Montana, has significant truck traffic that contribute to the issues. Trucks will not, repeat will not, slow down to 35 or 45 miles per hour, and enforcement at a city or county level is maxed out due to funding. We live on Hwy 87, and we get passed by semi’s (crossing on a double yellow line) nearly every time we travel from MP 3 to 7 in the 45 zone. As residents, we know the dangers of our populated area and animals that are there, so we observe the reduced speed zones. Very few trucks ever slow for these zones, so we see limited success as a result of settling for these methods as a solution. My neighbor experienced a collision as she was making a left turn into our subdivision by a motorcycle traveling 60mph, approaching from behind her, passing over a double yellow line, at a entrance to a significant subdivision, and collided with her as she was making her turn and he was attempting to pass her before she could complete the turn. Just one example.

My husband and I live in Island Park at Henrys Lake. We would like to make a public comment on the current ITD plan to redo this stretch of Hwy 20 (mp 402-406) in Island Park. My family and neighbors travel this stretch of road frequently during most of the year, in all seasons, including snow/ice periods, busy summer tourist season, and both spring and fall wildlife migrations. This road bisects a known important wildlife corridor for both moose and elk, and is occupied by other important wildlife such as grizzly bear and wolverine, wolves, pronghorn, deer, etc. This area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park. Over the years, the traffic coming through Island Park to YNP has greatly increased, causing concern for road safety issues, including wildlife vehicle collisions (WVCs). Much of the traffic coming through our area are people living in other areas and countries, and are not familiar with the hazards inherent in traveling through wildlife corridor territories. ITD has commissioned various studies of this area, including a WCS report on large mammal migration routes (elk and moose), has placed wildlife cameras in the area to determine wildlife movement across US 20, and a study by a recognized road ecologist (Safety Solutions for Wildlife Vehicle Collisions on Idaho’s US 20 and SH 87, Cramer 2016) on how to best mitigate WVCs (reduce them by as much as 90%) and make the road safer for both vehicles and animals. Recommendations from these reports identify mitigation methods that would greatly improve road safety on US 20. Wildlife such as ours is much treasured in the lower 48 states. People travel from all over the country and world to see and enjoy the wildlife experience we have here. It is a huge economic driver to the region, and the state of Idaho as a whole. Many local businesses would disappear without this tourist draw. The most cost effective method of installing
methods to improve the roadway for safe wildlife passage (SWPs)-overpasses and underpasses, and wildlife detection systems- would be at the time the road is already being rebuilt, such as this stretch of US 20 is now. This is an unprecedented opportunity for ITD to build mitigation for wildlife into the initial planning, budgeting, and engineering process for this project from the outset. Now is the time! Wildlife mitigation measures have been shown to reduce WVCs by 80-90%, improving road safety for all travelers as well as wildlife. Wildlife, especially endangered species, must be mitigated for in ITD projects. We urge you to follow the recommendations and results from the studies you have commissioned, and take this unique opportunity to build safe wildlife passage into this stretch of Hwy 20 for the long term future of highway safety in the area of Island Park. Thank you for the opportunity.

Hi i am a Island Park resident and for years i have been trying to get ITD to lower speed limit to 50 from Ashton Hill to Montana border because of the huge amount of wildlife kills do to auto and semi traffic. This area is getting more and more traffic every year heading to the park and i think will continue to rise. My thoughts would be to reroute semi tractor trailer traffic to 1-15 except local deliveries they are the largest contributer to animal kills and road destruction its only adds an hour at the most to their time and usual a half hour more out of their way.#2 lower the speed limit the 4 miles in question is curvey,shaded with blind corners and people turning out to stop at howard springs and the boarder for pics of divide sign,lots of snowmobile traffic in winter and atv traffic in summer.#3 make underground safe passages for animals. During migration hwy 20 looks like a butcher shop has blood spots every where. A couple of years back an accident at howard springs involving a deer then when responders came to help they were hit by another car. This sort if thing happens all the tine here,we keep life flight very busy. So if we could do these 3 things it would help alot and peoplw will get to the park safely and just a few min.later by a lower speed limit and we can save our wildlife that is being killed by the tons every day.

This is to share comments regarding the Environmental Assessment for the reconstruction of Targhee Pass, and to urge inclusion of wildlife safe passage measures. ITD has clearly stated the purpose and need regarding life cycle restoration of aging highway 20 over Targhee Pass, and it is good that ITD plans to improve and widen the highway. Further, I am pleased to know that you have identified animal collisions as a safety issue based on accident records and that you recognize this is a concern of the local community. I was unable to attend the December 15 meeting but have read the materials presented at the public meeting on the ITD website. It is impossible to overstate the importance of wildlife safe passage to the community. We live here because we love Greater Yellowstone and treasure its wildlife. We also want to be safe on our highways! I have a home near Targhee Pass and love watching and photographing the elk, bears and other wildlife that move through the area. I have also seen many dead animals by the side of the road, and know people who have been gravely injured in collisions with wildlife. Many studies document the dramatic reduction in collisions with animals when wildlife crossings are constructed. I am particularly impressed with how Banff National Park in Canada has handled this issue - and reduced wildlife collisions by 80%. Banff is an internationally acclaimed example of wildlife safe passage on its highways. Idaho has the opportunity to become another positive example to visitors from around the world who travel through Island Park en route to Yellowstone. The best and most economical time to build wildlife overpasses or underpasses is during road construction. Knowing that animal collisions are an issue on US 20 at Targhee Pass and a concern of the community, and having a recommendation from your consultant for overpasses or underpasses, it would be profoundly irresponsible not to include the recommended mitigation measures in the ITD plan. Thank you for your consideration of public comments. I look forward to your posting a study website to share more information, and to attending further public meetings.

1. I live in Bighorn Hills Estates Subdivision
2. If wildlife overcrossing installed how will you direct wildlife to the crossing?
3. Turn lanes for subdivision from north to South
4. Turn lane for Targhee Trailhead Road
5. People stop in front of Bighorn Hills to relieve themselves. A sight could direct them up the road to Howard Springs Wayside.
6. Better signage on Highway 87 indicating the intersection. Lots of slide throughs especially in the winter
7. Possible frontage road for residences and cabins near 87/20 intersection.
8. In winter sun never hits that area so people traveling north and south on dry road hit cover and frequently its iced.
9. Bighorn Hills Estates is averaging slightly over one new construction each year. 5-7 year-round residents to 12-13 during summer plus vacationers. Presently 37 homes with some rentals.

9
1. We would like to see a lower speed limit to better protect the wildlife and reduce the number of accidents
2. If Island Park is the emergency evacuation for Yellowstone and West Yellowstone—wider shoulders would help speed up the traffic flow.
3. If the studies who that building a wildlife bridge would benefit the animals and results is fewer accidents, we think it would be a good idea to get funding for the bridge.
4. Consider stop lights at Elk Creek Station and Robin’s Roost.

10
RE: Idaho Transportation Department’s Targhee Pass expansion project on US-20 Dear Targhee Pass Study Team, On behalf of the Greater Yellowstone Coalition (GYC) and the Yellowstone to Yukon Conservation Initiative (Y2Y) and our partners please accept the following comments on the Idaho Transportation Department’s (ITD) Targhee Pass expansion project that proposes to reconstruct four miles of US 20 with a truck climbing lane from the junction of SH 87 to the Montana state line between milepost 401.5 and milepost 406.3 near Island Park in Fremont County, ID.

The Greater Yellowstone Coalition is a regional conservation organization based in Bozeman, MT with offices in Idaho and Wyoming and over 95,000 supporters from across the country. Our mission is to work with people to protect the lands, waters and wildlife of the Greater Yellowstone Ecosystem (GYE), now and for future generations. Our members include residents living in eastern Idaho including Fremont County and Island Park, southwest Montana including the Madison Valley and West Yellowstone as well as visitors enjoying the GYE. GYC works to with diverse stakeholders to ensure the lands and wildlife of the GYE are protected and managed for healthy, functioning ecosystem. This includes transportation projects that have the ability to alter wildlife habitat and populations.

The Yellowstone to Yukon Conservation Initiative is a transboundary conservation organization with offices in Canmore, Alberta and Driggs, Idaho. Our mission is to protect and connect habitat from Yellowstone to Yukon so people and nature can thrive. We are the only organization dedicated to securing the long-term ecological health of this entire region. We take a scientific and collaborative approach to conservation, and highlight and focus on local issues that affect the region. We have worked with more than 300 partners, including scientists, conservation groups, landowners, businesses, government agencies as well as First Nations and Native American communities to protect this landscape.

Purpose and Need
The Purpose and Need for the Targhee Pass Project, as identified and proposed to the public on Dec. 15, 2016 stated: Project Purpose: Life cycle restoration of US 20 between mileposts 402.5 and 406.3. Safety and traffic flow improvements. Project Needs: Pavement surface and other roadway elements will not meet expected life cycle; deteriorations are beyond routine repair. Features such as shoulder widths do not meet current design safety standards. Increased traffic and future volumes cause congestion and safety problems. Animal collisions are identified in accident records as a safety problem and are a concern of the local community. In winter, specific areas have safety issues with blowing/drifting snow or excessive icing.
The Purpose and Need statements as defined by the Targhee Pass Environmental Study are short-sighted and don’t accurately represent the true economic, cultural, or Environmental impacts of Targhee Pass’ US 20 to the region. The important landscapes affected by Targhee Pass are described by Idaho Fish and Game as the Yellowstone Highlands and the Beaverhead Mountains in the State Wildlife Action Plan. The Plan identifies priority threats for Species of Greatest Conservation Need and strategies and conservation actions to mitigate those threats. The Plan recommends the implementation of wildlife crossing structures in the form of either the “construction of over- and under-passes” or the “incorporation of best practices for wildlife crossing into highway planning and construction.” Neither of these are addressed in the Project Purpose as written. We request that the Project Purpose be broadened to include language that is consistent with Idaho Department of Fish and Game’s State Wildlife Action Plan, specifically to provide protection and enhancement of terrestrial and aquatic habitat connectivity for the Species of Greatest Conservation Need (Tier 1 species include grizzly bear and wolverine) along with elk, moose, deer, Yellowstone cutthroat trout, and other native species within the project area. While the Project Needs touch on animal collisions as a safety problem and community issue, it currently lacks the scope, context, and intent that reflect the importance of fish and wildlife as a regional and national natural and economic resource. ITD’s iPlan website for the US Corridor Plan recognizes that: “Vehicle collisions with wildlife are the second most frequently reported cause of accidents along the corridor, a problem which merits considerable attention considering the threat posed to both the humans involved in such accidents and the biological resources threatened by the road hazard.”

Additionally, ITD recently hired road ecologist Dr. Patricia Cramer to complete an assessment of US 20 safe wildlife passage alternatives along US 20 and SH 87. Dr. Cramer’s recent study Safety Solutions for Wildlife-Vehicle Collisions on Idaho’s US 20 and SH 87 identifies Targhee Pass as having the highest wildlife vehicle collision crashes per mile per year of any of the sections on US 20, at .85 WVC/mi/yr. Between 2010 and 2014, there were 17 reported wildlife vehicle collisions in this section of road, and in September 2015 (Cramer, 2016), a sub-adult grizzly bear was killed on Targhee Pass, as a number of cars ran over the bear. Cramer also states that: “This area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park and large scale regional movements of carnivores such as grizzly bear and wolverine as they move to and from other ecosystems to the east and west, southwest and southeast.

Thus the animals in this area are of greater potential danger for (wildlife vehicle collisions) as are the humans traveling this section of road.” Increasing traffic in to and out of Yellowstone National Park on US 20 will result in more wildlife losses potentially altering wildlife migrations in the Yellowstone region. The Environmental Study infers that increasing traffic along US 20 will cause congestion and safety problems, which justifies the widening and straightening of Targhee Pass. These proposed solutions, however, will most likely have a dramatic negative effect on local wildlife survival and migration patterns. Studies show that traffic volumes of more than 2500 annual average daily traffic volume (AADT) dramatically increase the number of wildlife mortalities due to wildlife vehicle collisions, repel animals from crossing near busy roads, and impede safe wildlife crossings on highways. Similarly, numerous studies show that the operating speed of a highway is one of the most significant predictors of wildlife-vehicle collisions, as it significantly reduces the driver’s reaction time compared with reaction times at slower speeds. Other studies similarly indicate that road improvements, including straightening out curves, increasing lane and shoulder widths and paving gravel surfaces, are associated with an increase in wildlife-vehicle collisions.

We therefore request that the Project Needs be expanded to include:
- The project’s unique and significant geographic location to reflect its proximity to Yellowstone National Park, specifically noting the need to protect economic and cultural benefits of wildlife viewing, hunting and fishing within the Greater Yellowstone Ecosystem
- The need to protect the historical and cultural importance of the Nez Perce (Nee-Me-Poo) National Historic Trail and other cultural resources of importance to the Nez Perce and Shoshone-Bannock Tribes
- The need to provide safe wildlife passage between Yellowstone National Park and the Salmon-Selway-Bitterroot Wildlands Complex in central Idaho
- The need to protect terrestrial and aquatic habitat quality and connectivity for the survival and long-term health of fish and wildlife in the area
• The need to mitigate the deleterious impact to wildlife populations and their ability to naturally move and migrate along this stretch of road at the current and forecasted traffic volumes, road width, and speed, and
• The need to reduce the likelihood of wildlife vehicle collisions at current and future traffic projections to protect Tier 1 Species of Greatest Conservation Need and maintain connectivity along important migration and movement routes as established by mule deer, elk and moose in the area that are already bisected by US 20.

Federal Environmental Statutes, Regulations and Executive Orders
The Idaho Transportation Department plans to utilize Federal Highway funds for this project. Therefore there are several federal environmental statutes, regulations and Executive Orders that should be applied and considered for the Targhee Pass project to receive federal aid and be located on federal lands. These include, National Environmental Protection Act (NEPA), Federal-Aid Highway Act of 1970 and subsequent amendments, the Endangered Species Act (ESA) and the Council of Environmental Quality’s regulations for implementing NEPA. NEPA states in section 102(2)(E), 42 U.S.C. 4332(E) that agencies shall, “study, develop and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” The regulations of NEPA 40 CFR, § 1500.2(e) and (f) requires Federal agencies “to the fullest extent possible use the NEPA process to identity and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment” and “use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.” Other laws that apply to projects that receive FHWA funds include the Federal-Aid Highway Act of 1970, 23 U.S.C. 109,§ 109(h) requires the Secretary to promulgate guidelines to “assure that possible adverse, economic, social, and environmental effects relating to any proposed project on any Federal-aid system have been fully considered in developing such a project, and that the final decisions on the project are made in the best overall interest, taking into consideration the need for fast, safe and efficient transportation, public services, and the costs of eliminating or minimizing such adverse effects and the following: (1) air, noise and water pollution; [and] (2) destruction or disruption of manmade and natural resources, aesthetic values, community cohesion and the availability of public facilities and services....” The ESA provides for the protection of species that are endangered or threatened with extinction throughout all or a significant portion of their range, and for conservation of the ecosystems on which they depend. The Yellowstone Grizzly Bear was listed as threatened by extinction in 1975 and to date they remain on the ESA as a federally listed species. The Department of Transportation Act, 23 U.S.C. 138 and 49 U.S.C 303 (Section 4(f)) provides that the Secretary of Transportation may approve a project that requires the use of public lands or wildlife only if there is no prudent or feasible alternative and the project includes all possible planning to minimize harm to the property. [emphasis added] The Council on Environmental Quality (CEQ) describes the regulations of implementing NEPA and provides guidance on determining the significance of a project under 40 CFR 1508.27. A series of questions can be posed to help determine significance. For the purposes of determining significance of the Targhee Pass Project, we will attempt to answer these questions:

• What is the context (local, regional, national) of the affected interest?
  o Given the importance of this area of US 20 to the unique resources of Yellowstone National Park and its wildlife as well as the importance of this area to the Nez Perce Tribe, we argue that the project has significant regional interest.
• To what degree will the proposal affect public health and safety?
  o ITD proposes to widen and straighten the Targhee Pass area of US 20 to improve safety. However, this does not take into account wildlife vehicle collisions (WVC) and the safety implications that would occur when WVCs increase as speeds and traffic increase. A recent study by the Western Transportation Institute on U.S. Hwy 93 North examined WVCs and wildlife crossings. In the sections of US 93 that did not incorporate wildlife crossings acknowledged that “wider lands, wider shoulders, longer sight distances and more gentle curves improve human safety in general, wildlife-vehicle collisions are likely to increase (Huijser, December 2016).”
• Are there unique characteristics such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas?
The Targhee Pass project on US 20 is adjacent to the Nez Perce Trail, is proximate to Yellowstone National Park, is bordered by important wetlands and tributaries that are important to native trout including Howard Springs and Howard Creek and has been described as an area frequently used by wildlife including endangered species.

- Is there controversy regarding environmental effects?
  - Given the amount of public interest, particularly those around wildlife impacts, this project can be controversial.

- Are there highly uncertain, unique or unknown risks?
  - Unintended consequences of reconstructing US 20 without mitigation for wildlife and wildlife vehicle collisions can have detrimental human safety and environmental effects.

- Will it establish precedent or principle?
  - Given the engagement of ITD to update the US 20 Safety Corridor Plan, the Targhee Pass project can set the precedent for how ITD will mitigation for safe wildlife passage and reduce wildlife-vehicle collisions along US 20 for the next 20+ years.

- Is the proposed action related to other actions with individually insignificant but cumulatively significant impacts?
  - Without adequate safe wildlife passage mitigation along US 20 in Island Park, this section of road has the potential to become a permanent barrier for wildlife migration from Yellowstone National Park and impede the survival of the species such as the Sand Creek Elk herd, ESA listed species such as grizzly bear and Canada lynx and potentially listed species such as wolverine.

- Does the proposal adversely affect scientific, cultural or historic resources?
  - This project is located adjacent to the Nez Perce National Historic Trail and has the potential to disturb cultural artifacts.

- Would the proposal adversely affect an endangered or threatened species or its habitat?
  - The Targhee Pass project is located in the Primary Conservation Area for ESA listed Yellowstone Grizzly Bears and is occupied habitat for grizzlies and wolverines, which are being litigated to be added to the ESA list.

- Would the action be likely to result in a violation of Federal, State or local law or environmental requirements?
  - Alternatives for the project must include mitigation for wildlife.

- “Significant impacts” may be both beneficial or adverse for purposes of NEPA. See 40 CFR 1508.27(b) (1); EDF v. March, 651 F.2d 983 (5th Cir 1981). Federal-aid highway funds are authorized by Congress to assist the States in providing for construction, reconstruction, and improvement of highways and bridges on eligible Federal-Aid highway routes. The Federal Highways Administration (FHWA) requires project sponsors, in this case ITD, to meet the following requirements (Federal Highways Administration, 2011):
  - All projects requiring Federal action or that are to be implemented with Federal-aid must come from a fiscally constrained Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (ITP) or from a fiscally constrained Statewide Transportation Planning Program (STIP) [23 CFR Part 450].
    - The TIP shall include a Project, or an identified phase of a Project, only if full funding can reasonably be anticipated to be available for the Project or the identified phase within the time period contemplated for completion of the Project or the identified phase. [23 U.S.C.§ 134(jj)(3)]
    - The STIP shall include a Project, or an identified phase of a Project, only if full funding can reasonably be anticipated to be available for the Project within the time period contemplated for completion of the Project [23 U.S.C.§ 135 (g)(4)(E)]
    - NEPA project approval can only be given when the NEPA documents meet all applicable environmental laws and Executive Orders or reasonable assurances of compliance are provided in accordance with 23 CFR§ 771.133.
    - In air quality nonattainment and maintenance areas, additionally Clean Air and EPA requirements apply [42 U.S.C.§ 7506© and 40 CFR Part 93].

Clearly, given the environmental significance of the Targhee Pass project, it should meet the requirements of NEPA and therefore include reasonable alternatives that address the impacts to wildlife and wildlife-vehicle collisions. Fiscal constraints of a project should not limit alternatives for being examined or deemed reasonable. In fact, FHWA defines “fiscal constraint” as “sufficient financial information to demonstrate the Projects in the MTP, TIP and STIP can be implemented using committed, available, or reasonably available revenue sources, with assurance that the Federally supported transportation system is being adequately operated and maintained.” In addition, “reasonably available” funds are described as a judgement decision. FHWA guides decision makers to consider if there is “evidence of review and support of the new revenue assumption by the State and local officials and
Mitigation for Wildlife— Studies, Public Comments, and Additional Agency Involvement

Transportation Investment Program. 30 July, 2016.
ITD commissioned and supported two critical reports in the last three years that specifically address human and wildlife safety on US 20, which together address wildlife movement and migration patterns and potential mitigation solutions to keep humans and wildlife safe. The Wildlife Conservation Society (WCS) worked with the Idaho Department of Fish and Game and ITD to complete a study on elk and moose hotspots along US 20 and SH 87 from Ashton to the Montana State Line. 13 In this study, researchers collared migratory elk, resident moose, and non-migratory moose for three years to track and model their movement patterns. The study identified 6 priority (9 total) hotspots for elk and moose. Among the most important areas for protection was Targhee Pass. In addition, ITD commissioned road ecologist Dr. Cramer to complete Safety Solutions for Wildlife and Human Safety on US 20, which together address wildlife movement and migration patterns and potential solutions that also provide movement opportunities for wildlife across the two highways” (Cramer, 2014). Cramer recommended 11 new overpasses, 3 underpasses, and 5 bridge retrofits from Ashton to the Montana State Line, including three overpasses in the Targhee Pass project area. Both of these studies and their recommendations should be fully integrated into ITD’s iPlan website and be used by the Environmental Study team when looking to develop alternatives. GYC and Y2Y submitted comments that used both of these studies and extensive maps from the WCS study as part of the 2016 ITIP process (Callahan, 2016). Additionally, ITD should integrate that letter and all other Targhee Pass comments submitted in the ITIP process as part of this scoping process. Similarly, along with NEPA, the ESA should be considered in the development of the Targhee Pass project. The Targhee Pass project area is located in occupied grizzly bear habitat and in the Primary Conservation Area (PCA) identified in the 2016 Final Draft Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem.14 Therefore, formal consultation with the U.S. Fish and Wildlife Service (USFWS) to assess the impacts of the project on grizzly bears is likely required. In addition, the vision of the Final Draft 2016 Conservation Strategy includes language describing the PCA as “a secure area for grizzly bears, with population and habitat conditions maintained to ensure a recovered population is maintained for the foreseeable future and to allow bears to continue to expand outside of the PCA.” Section 7, 16 U.S.C.

1536 prohibits any Federal action that would jeopardize a listed species or destroy or modify its critical habitat unless exempted.

Economic Impact
The fish and wildlife resources of Fremont County, ID are highly valued in the community and play a significant role in the community’s economy. According to the January 2017 Idaho Department of Labor’s Workforce Trends for Fremont County, Idaho it describes the population as growing due to the “tourism related industries [that] benefit from close proximity to Yellowstone National Park” and describes US 20 as “heavily traveled by tourists headed for Yellowstone National Park, Henry’s Lake and Harriman State Park. The county attracts many locals to its recreation areas but also draws national and international tourists.” The workforce in Fremont County remains strong with leisure and hospitality accounting for a large percentage of the county’s jobs. In Island Park, Idaho the leading industries and majority of jobs are tourism related including accommodations, food services and retail. Additionally, the Fremont County Comprehensive Plan speaks specifically to fish and wildlife resources under Policies 11 and 18. (County, 2008).

“It shall be the policy of Fremont County to use its development code to maintain, protect and enhance fish and wildlife resources and their habitats as identified in the Fremont County Wildlife Overlay Map.” The Plan goes on to state, “the County recognizes that fish and wildlife are a cornerstone element of Fremont County’s economy, image, heritage and reputation as an international recreational destination. The County also recognizes that fish and wildlife resources offer recreation and sporting opportunities, which depend on abundant open space, clean water, and healthy ecosystems with intact fish and wildlife resources and habitat.” “It shall be the policy of Fremont County to recognize the economic importance of recreation and use its development code to maintain, protect and enhance recreational resources and opportunities in the County”. And goes on to state, “The County recognizes that recreational resources and opportunities depend on open space, clean water, healthy ecosystems, abundant fish and wildlife populations, intact fish and wildlife habitat, access to land and water, and the unspoiled rural aesthetic values for which Fremont County is internationally famous.”

In 2005 the Henry’s Fork Foundation commissioned a study to examine the economic value of recreational fishing and boating that included the Henry’s Fork in Fremont County and determined that fishing generated $29 million in current jobs and income and $796,208 was generated from recreational boating.16

Proposed Alternatives
The Wildlife Crossings Structure Handbook (US Department of Transportation, 2011) describes planning alternatives for safe wildlife passage in three ways– avoiding critical wildlife habitat, mitigating affected wildlife populations, or compensating for the loss of wildlife habitat. Although it is too late to fully avoid US 20 bisecting critical habitat for wildlife like wolverines, elk, moose, and bear moving in and out of Yellowstone National Park, it is possible to create alternatives in the Environmental Study that will meet the needs of ITD and the ecosystem. We request that ITD avoids additional fragmentation of critical habitat and provides adequate wildlife mitigations in every alternative as you move through the Environmental Study process. Below are recommendations from local residents to professional road ecologists. While many road ecologists and agencies have created extensive lists of wildlife mitigation alternatives, Cramer’s US 20 study includes an “Overview of strategies to reduce wildlife vehicle collisions” (Cramer 2016).

Wildlife Mitigations from Cramer 2016 Report
Using local wildlife data, modeling, and crash and carcass data, Dr. Cramer prioritized the Targhee Pass section of US 20 among the most important for wildlife mitigations. The report suggests three wildlife overpasses between mile markers 402 and 406– one south of Big Horn Estates, one tunnel north of Big Horn Estates, and one near the top of the Continental Divide at the Montana state line. All of these overpasses would require significant fencing to the junction with SH 87 to the state line to keep animals off the road and to funnel them toward overpasses.

Modified Recommendations by the Henry’s Fork Legacy Project
Members of the Henry’s Fork Legacy Project reviewed Dr. Cramer’s findings and report and visiting the proposed overpass sites. Using local knowledge of landowner support, development growth, recreation, and land management, members of the Henry’s Fork Legacy Project supported anywhere from one to three overpasses for the Targhee Pass Environmental Study. With two of Cramer’s proposed overpasses being on private land, some members of the Henry’s Fork Legacy Project recommended one overpass south of Big Horn Estates and one north of Big Horn Estates further north so it would be located on land managed by the Caribou Targhee National Forest.
on both sides of the road. Members of the Henry’s Fork Legacy Project also propose an underpass to provide ample fish and wildlife passage at Howard Creek near the Continental Divide. Finally, new studies from the overpass and underpass system located north of Missoula, Montana show that three miles of fencing on either side of an overpass or underpass are necessary to ensure 80-100% reduction in mortality rates (Huijser, 2016). Another alternative supported by some members of the Henry’s Fork Legacy Project included an option NOT to expand US 20 on Targhee Pass, but instead to fix the road, build one overpass located north of Big Horn Estates on Caribou-Targhee National Forest property, and to install the appropriate fencing around one overpass. Reducing speeds and rerouting truck traffic. Over the last year, GYC, Y2Y, and other members of the Henry’s Fork Legacy Project, have met with many members of the public, road ecologists, wildlife biologists, and ITD. The Henry’s Fork Legacy Project collected dozens of cards with comments from the public on US 20 this summer. The most common request for ITD was to slow the speeds. Reducing speed limits and increasing enforcement is one of the least expensive alternatives to increase safety and minimize impacts to wildlife. This will require ITD to not redesign the roads for higher speeds and work with Fremont County to enforce speed limits. This option could go hand in glove with requests from other groups like the Citizens Road Alliance to route truck traffic from US 20 back to I-15.17

Conclusions
In conclusion, GYC, Y2Y, and our partners hope to see a variety of wildlife mitigation options built in to the construction alternatives brought forward by the Environmental Study team. The Idaho Transportation Department has taken on creative terrestrial and aquatic connectivity mitigation projects throughout the state (Callahan, 2016), and we firmly believe that providing the same on Targhee Pass is the best decision for Idaho’s roads, wildlife, visitors, and residents. Providing safe wildlife passage on a road with forecasted increases in volume is the safe thing to do for humans and the right thing to do for wildlife. We look forward to working with you as you develop the Environmental Study. Between us, we have a great base of knowledge and resources to share with you – please let us know how we can help. Finally, we are hosting a workshop at the Boise headquarters of ITD on March 1 on safe wildlife passage options. We hope you can participate.

Thank you for considering our comments. Please contact any of us if you have any questions.

REFERENCES


8 Federal Highways Administration’s “Supplement to January 28, 2008 “Transportation Planning Requirements and Their Relationship to NEPA Process Completion” February 9, 2019 “Idaho getting $16M boost in federal highway funds this year, thanks to FAST Act.” Monday, Feb. 8, 2016. Russel, Besty, bzrussell@gmail.com


12 Callahan, Renee (Center for Large Landscape Conservation), Domenech, Elizabeth (Yellowstone to Yukon Conservation Initiative), McClure, Meredith, (Center for Large Landscape Conservation), Paul, Kylie (Defenders of Wildlife), Robinson, Lacy (Yellowstone to Yukon Conservation Initiative), Trotter, Kim (Yellowstone to Yukon Conservation Initiative). Letter to Idaho Transportation Department, Attn: Adam Rush, Comments on Idaho Transportation Department 2017-2021 Idaho Transportation Investment Program.


11 TARGHEE PASS ROAD PROJECT COMMENTS

“These comments are meant for government agencies and should not be distributed to non-government agencies or individuals.”

1. These comments are in regard to the information provided at the public open house on December 15, 2016: The information clearly indicates that ITD did not work with the people of Island Park, county representatives, or city representatives, but rather ITD worked with NGO’s. This is viewed very negatively by the “locals”. The NGO representatives do not even live in the area. You do not mean “reduced curve radius”. You must mean “increased” curve radius. I have never seen traffic congestion in this area and therefore see no need for an “eastbound climbing lane”.

2. General comments follow: Compliance with the Fremont County Comprehensive Plan and Development Code will be required if there is encroachment on private land. This will be true for wildlife overpasses and underpasses. Viewscapes certainly
could be compromised in the process. This is a scenic area that should not be compromised. Vehicle collision
avoidance systems development and deployment will make the need for overpasses and underpasses obsolete.
These collisions will not occur in the future. This technology is already being deployed by car and truck companies
throughout the world. Self-driving cars have already demonstrated the incredible sophistication of this technology.
There is no reason to spend taxpayer money on overpasses. ITD should consult with technical experts on this
technology. Wider roads apparently reduce connectivity. Do not widen the road. Reduce the speed limit in the
area, especially at night. Do not make improvements that allow people to drive faster. Put in more curves!! (just
kidding)

IDFG should guarantee that hunting will not be restricted in the area of the overpasses/underpasses. Animals will
now be concentrated.

3. Wildlife Study (Cramer 2016) Comments follow:
I had to read no further than the acknowledgements to know that this study would be suspect. A great deal of the
input came from NGO’s whose goal is wildlife connectivity, not transportation safety and efficiency. NGO’s were
allowed to “score” the relative importance/priority of the sections of Hwy 20 that should be improved. Their
scoring totally shifted the results and resulted in this section being priority 2 in the study. I do not know of any
elected official in Fremont County or any “local” that was allowed to score the priority. This is extremely
disappointing and is ground for dismissing the study results. Who better to score the priority than locals. We use
Hwy 20 everyday! $60,000 wasted? The study seems to conflict with a study that was done for congress on wildlife
vehicle collision. This is notable in the area of wildlife detection and warning systems effectiveness and cost. ITD
should review the congressional study. I question whether or not the study was independent, totally scientific,
and unbiased. That being said, Dr. Cramer has impeccable credentials in this area. Her resume is very impressive.

4. Conclusion
If ITD’s primary goal is traffic safety, there is no need for underpasses or overpasses. Collision avoidance
technology will be very effective in preventing these collisions. On the other hand, if ITD’s primary goal is wildlife
connectivity, underpasses and overpasses may be effective. ITD’s money should be spent on the road
improvement and IDFG and NGOs should pay for the passages.
“These comments are meant for government agencies and should not be distributed to non-government agencies
or individuals.”

12

• Hazard where people stop at the border to take pictures in front of either “Welcome to Idaho” or “Welcome to
Montana” sign. Folks crossing road – can’t believe someone hasn’t got hit.
• Targhee Creek trailhead turn/road– your stopped to turn and folks from the south come around the corner and
there you are waiting to turn left.
• Animal crossing from 87 Intersection to the MT Line– migration route – I work in west Yellowstone for 18 years
so I see lots of game.
• Shade area just north of the Targhee Creek Trail Head
• Pulling in and out of Howard Creek Pullout

13

A major concern for this area is its wildlife. Wildlife is critical to the economy and character of this area. Of utmost
concern to any motorist along US 20 is the potential for a WVC. If wildlife are accommodated in this plan, then
human safety is considered at a broader level. I would like to see ITD incorporate mitigation plans into their entire
Corridor Safety Plan for US 20, including the Targhee Pass proposed project. This is a critical region for wildlife
connectivity, and hence an increased risk area for drivers. Of critical importance, is to plan to find mitigation in the
corridor plan. Also, the proposed changes to the Targhee Pass stretch of US 20 may likely increase driver speeds. If
this happens, the risk to human health and safety. ITD should consider, as a mitigation option, decreasing speed
limits in this area and throughout the corridor and to work with partners that are interested in exploring funding
options for increased law enforcement of lowered speed limits. (Partners such as the Henry’s Fork Legacy Project).
Additionally, I would like to see ITD engage more directly with groups such as HFLP (IE further responses to their comments through IP Safe Wildlife Passages)

| 14 | Concerned about steep drop offs. Supports passing lane and other safety improvements |
| 15 | 1. Include all wildlife crossing data in your planning from the onset  
2. Heavy truck traffic has no reason to use Hwy 20 unless making local deliveries  
3. Slower speed limit should be a consideration. Reducing limits to 45 mph from Ashton Hill to MT Border adds less than 18 minutes to the trip–18 minutes through the most beautiful country. These drivers would thank you for forcing them to slow down and soak it in! |

I am writing to provide comment on the proposed road improvement project, including realignment and the addition of a truck climbing lane, on US Highway 20 (US 20) from the intersection of Highway 87 to the Montana line at Targhee Pass. I thank you for the opportunity to do so. Early planning offers Idaho Transportation Department (ITD) an opportunity to identify issues, consider resolutions, and include mitigation measures in the final construction design. First, ITD must recognize and respect that a robust and diverse wildlife population is the essence of Island Park. Wildlife draw people to this area. Wildlife viewing and big game hunting do wonders for the local economy. Protecting wildlife: big game, forest carnivores, and the diminutive species which keep the fabric of the ecosystem together, is of paramount importance for the local residents and seasonal visitors alike. A study financed by ITD on the movement of elk and deer in the Island Park Area revealed that a large number of big game animals cross US 20; many on a daily basis. This study identified the section of highway included in this project as a high use area for big game movement, both daily and seasonally; particularly during spring and fall migration. A great number of the wildlife crossing US 20 in this area are the iconic species from Yellowstone National Park, including elk and grizzly bear. There are few comprehensive data on the known number of vehicle-wildlife collisions (VWC) in this section of the highway. Even so, because VWCs are not always immediately fatal to the animals, many of which die distant from the highway, these data represent only a portion of the animals hit by vehicles. What is known is that where these animals exist, wildlife over or under-passes provide safe wildlife passage and reduce VWCs by up to 90%. Preventing VWCs clearly improves safety for the traveler, advances smooth traffic flow by reducing road closures and traffic slow down associated with highway accidents, and benefits wildlife. Each of the foregoing also translate into an economic benefit.

ITD funded a recent analysis of wildlife movement patterns across US 20 by Dr. Pat Cramer for District 6. This study highlighted two areas within the project area ripe for safe wildlife passage measures: one near the bottom of the hill close to the intersection of Highway 87 and one near the top by the Idaho-Montana border. There are several ways to reduce VWCs in the project area, and throughout Island Park. Lowering the speed limit and eliminating all but local-delivery truck traffic are two. While these are both inexpensive and can be implemented immediately, they are unlikely to get much traction with ITD; nor is their effectiveness guaranteed or permanent. Greatly reducing VWCs is best accomplished by physically separating wildlife from vehicles: wildlife overpasses or underpasses are the best mechanism to accomplish that. Data from Banff National Park, as well as Nevada and Colorado, provide examples of the unequivocal success of these structures. I strongly encourage ITD to include safe wildlife passage as a major concern and talking point in the planning process for the US 20 Targhee Pass project, and to seriously consider wildlife crossing structures as a viable and effective mitigation measure. Thank you for the opportunity to provide comment.

| 17 | Please include animal migration issues – perhaps an overpass or underpass for animals to safely cross. |

| 18 |  |
1- Bike travel and safety (you would like to see a bike lane added or a significantly wider shoulder to accommodate the bike travel throughout the warm season from Harriman State Park to West Yellowstone). At least 3 feet should be added if ITD is spending the money.

2- The current situation is dangerous, particularly pulling into the residential area at Big Horn Estates. Turning right requires you to stop traffic or pulling off onto the dirt shoulder. Turning left requires stopping fast moving traffic and should have a third lane added. ITD should consider a divided highway, adding a lane, and/or established turn outs to residential areas.

3- If US 20- allows semi-truck travel then the road should be built to accommodate safe semi travel with a divided highway and bike lane. The significant travel in the warm months (from when the snow melts through October) creates a dangerous situation to pedestrians, bikers, and vehicle travel.

19

As you know, Fremont County is responsible for the grooming and maintenance of over 500 miles of snowmobile/UTV trails each winter. One of our biggest “headaches” in the grooming business is Targhee Pass Trail, particularly as it crosses SH-87. With numerous sign posts, the electrical substation and an abundance of snow, the site is consistently difficult to cross. However, the SH-87 junction is part of a very popular winter trail, a main route for individuals traveling between Island Park and West Yellowstone. In your planning, I request you consider the challenges faced by winter recreationists along this route To help you plan, may we provide additional information regarding trail grooming/signing Our department would be happy to arrange a demonstration at the site allowing you to see how trail grooming equipment operates, the space needed, as well as the equipment’s limitations in establishing a trail. In basic terms, the SH-87 crossing is a “beast” and it need help! Please keep us “in the loop” as you go forward with your planning.

20

I have spent many weeks in the vicinity of Island Park while visiting family at Henry's Lake. During those trips I have witnessed dead wildlife as a result of collision with a vehicle. Each time it has saddened me not only for the animal, but for the human being involved in the collision. Then when visiting British Columbia last summer, I was amazed at the wonderful job that has been done in Canada to allow for safe wildlife passages either through tunnels or overpass ramps. It made me mad that the US is so far behind in this type of development; therefore, I am sending this email to encourage a wildlife passage on Highway 20 from Highway 87 over Targhee Pass. Thank you for your consideration of my sincere concern.

21

This area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park low the speed limit! The simplest way to keep this section of road safe is by lowering the speed limit. Lower speed limits are safer for humans and wildlife. support safe wildlife passage for iconic wildlife moving in and out of Yellowstone National Park that are important to our economy, culture and quality of life. Implement the safe wildlife passage on Targhee Pass as recommended in the recent ITD-commissioned wildlife study “Safety Solutions for Wildlife Vehicle Collisions on Idaho’s US 20 and SH 87” (Cramer 2016). In this section, they recommend wildlife overpasses and associated fencing. Wildlife, especially endangered species, MUST be mitigated for in ITD projects. Design and engineer in safe wildlife crossings from the start. Recent studies (Haujser 2016) show that wider roads and higher speed limits severely limit wildlife movement across roads that are in traditional wildlife migration and movement corridors. Wildlife are good for our economy! Help protect our wildlife and drivers as traffic increases along US 20. People from around the world travel to the Yellowstone region to enjoy the spectacular wildlife here. Thank you for your consideration,

22

We are for slow speeds in the tarhee pass corridor. Also, please add wildlife migrations.
We are for anything in the new design proposal which benefits this crucial wildlife corridor.

23
I own a cabin in Island Park and want to comment on the current ITD plan to re-do this stretch of Hwy 20 (mp 402-406) in Island Park. This road bisects a known important wildlife corridor for both moose and elk, and is occupied by other important wildlife such as grizzly bear and wolverine, wolves, pronghorn, deer, etc. This area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park. Over the years, the traffic coming through Island Park to YNP has greatly increased, causing concern for road safety issues, including wildlife vehicle collisions (WVCs). Much of the traffic coming through our area are people living in other areas and countries, and are not familiar with the hazards inherent in traveling through wildlife corridor territories. ITD has commissioned various studies of this area, including a WCS report on large mammal migration routes (elk and moose), has placed wildlife cameras in the area to determine wildlife movement across US 20, and a study by a recognized road ecologist (Safety Solutions for Wildlife Vehicle Collisions on Idaho’s US 20 and SH 87, Cramer 2016) on how to best mitigate WVCs (reduce them by as much as 90%) and make the road safer for both vehicles and animals. Recommendations from these reports identify mitigation methods that would greatly improve road safety on US 20. Wildlife such as ours is much treasured in the lower 48 states. People travel from all over the country and world to see and enjoy the wildlife experience we have here. It is a huge economic driver to the region, and the state of Idaho as a whole. Many local businesses would disappear without this tourist draw. The simplest and most cost effective way to reduce WVCs is to reduce the speed limit on Highway 20. Reducing the speed limit by as little as 10 MPH -- from 65mph to 55 mph -- would significantly reduce the number of collisions. The most cost effective method of installing methods to improve the roadway for safe wildlife passage (SWPs)- overpasses and underpasses, and wildlife detection systems- would be at the time the road is already being rebuilt, such as this stretch of US 20 is now. This is an unprecedented opportunity for ITD to build mitigation for wildlife into the initial planning, budgeting, and engineering process for this project from the outset. Now is the time! Wildlife mitigation measures have been shown to reduce WVCs by 80-90%, improving road safety for all travelers as well as wildlife. Wildlife, especially endangered species, must be mitigated for in ITD projects. We urge you to follow the recommendations and results from the studies you have commissioned, and take this unique opportunity to build safe wildlife passage into this stretch of Hwy 20 for the long term future of highway safety in the area of Island Park. Thank you for the opportunity to comment on this project.

I have property on Hwy 87 about 4 miles from the junction with Hwy 20. I spend about 5 months out of the year at this residence and my family has done so for generations. For these reasons I am very much invested in a plan for Targhee pass that positively impacts both wildlife and human safety. In addition to my personal investment, the ITD-contracted study on "Safety Solutions for Wildlife Vehicle Collisions on Idaho’s US 20 and SH 87 " states "This area is of the greatest wildlife connectivity value of any stretch of US 20". Wildlife mitigation measures have been shown to reduce wildlife-vehicle collisions by 80 to 90 %. I strongly urge the following be included in the plan: 1. Design and engineer wildlife overpasses and associated fencing as recommended in the above mentioned study (Cramer 2016). Wildlife, especially endangered species, must be mitigated for in ITD projects. 2. Build mitigation measures for wildlife into the planning, budgeting, and engineering process from the outset. 3. Slow the speed limit on this section of US 20. Slower speed limits are safer for people and wildlife. Lastly, wildlife is good for our economy, and is part of the regions culture and heritage.

Dear Idaho Transportation Department Decisionmakers:
I am submitting these comments in support of your providing safe wildlife passages when you conduct the upgrades to Targhee Pass. We own a cabin in Island Park, where we enjoy being able to view the many species of wildlife that make Idaho a wonderful place to live and vacation. Safe wildlife passage for iconic wildlife moving in and out of Yellowstone National Park is important to our economy, culture and quality of life. I urge you to implement the safe wildlife passage on Targhee Pass as recommended in the recent ITD-commissioned wildlife study"Safety Solutions for Wildlife Vehicle Collisions on Idaho’s US 20 and SH 87" (Cramer 2016), specifically wildlife overpasses and associated fencing. Wildlife, especially endangered species, MUST be mitigated for in ITD projects. It makes sense to design and engineer in safe wildlife crossings from the start. Wildlife are good for our economy! Help protect our wildlife and drivers as traffic increases along US 20. People from around the world
travel to the Yellowstone region to enjoy the spectacular wildlife here. Providing safe passage for wildlife reduces the risk of traffic collisions that could result in expensive vehicular damage, serious injury to people, and loss of human life. Please use this opportunity to enhance protections for both wildlife and human populations.

26

I am writing today to comment on Idaho Transportation Department’s Targhee Pass environmental assessment and their proposed plans to reconstruct a portion of highway 20 between the junction of highway 87 and the Montana state line. I live and work near Henry’s Lake and travel frequently over Targhee Pass and have been concerned about my safety and the safety of my family. I feel that the current posted speed limit is too fast for that section of highway and that reducing the speed limit to improve safety should be considered. I also believe you should consider installing safe wildlife crossings to not only improve driver safety, but also to help protect the areas wildlife species. And a turning lane to access the Targhee Creek Trail head would also be a tremendous value and improve safety. And while driver safety and efficient transportation is important, it is also important to protect the areas iconic wildlife species. The area draws hundreds of thousand of visitors a year, the local economy is based not only on its proximity to Yellowstone National Park, but the areas recreational opportunities, including wildlife viewing, hunting and fishing. Protecting humans and wildlife should both be a priority as ITD considers the reconstruction of Targhee Pass. Thanks for your time and consideration of this important matter.

27

My wife and I own a home near Targhee Pass and have a great interest in the planned improvements on Highway 20. Improving the highway is important to meet projected needs regarding pavement condition, safety standards, and increasing traffic. More traffic also means more collisions with the abundant wildlife in the area - and greater risk of injury and death to motorists, as well as property damage to vehicles. Wildlife safe passage measures have been recommended for this section of highway and have been shown to reduce collisions with wildlife by up to 90% when implemented elsewhere. Please place the highest priority on inclusion of the recommended overpasses and/or underpasses when finalizing the Environmental Assessment.

28

I wish to submit this information for your consideration. I attended a safe passage presentation at an Island Park Preservation Coalition meeting, and have since received notifications concerning this proposed project. I have also learned through hard experience, to look ‘into’ all large landscape proposals suggested for Island Park.

(1) The word document is my public comment.
(2) The maps I have copied from the websites of The Brainerd Foundation-place based conservation efforts/Future West, The Heart of the Rockies, and The Greater Yellowstone Coalition. The Henry’s Fork Legacy Project on the Future West map is of particular import, as The Henry’s Fork Legacy Project was allowed to score and prioritize the Cramer report-the foundational document that advances this safe passage initiative. The maps illustrate the target areas of focus for regional NGO’s. it is my personal knowledge that their personnel are all closely associated and work collaboratively. Appraisal of their websites speak to the focus of their work. I have attached the maps to support my comments.

(3) I have also included a copy of an email I received from Friends of the Safe Passage Initiative. (please note the CONNECTIVITY language). It is my firm conviction that CONNECTIVITY is as much or more, the primary interest in this project, than is solely safe wildlife passage. Wildlife well-being is too often incorporated within-hard to separate from, and is a favored ‘tool’ used by environmental NGO’s, to promote their larger agenda, which is large landscape changes, designations and/or acquisitions to accomplish the goal of CONNECTIVITY.

links:
http://www.brainerd.org/funding/place-based-conservation.php
http://heart-of-rockies.org
http://greateryellowstone.org/map
I appreciate the opportunity to comment and to have you consider my comments.

<Comments Attached>

Public comment for ITD

I feel a great loss and sadness at seeing any/all wildlife wasted and broken on the highway, a victim of a traffic collision accident. This is also a sad reality where wild lands and their creatures meet human activity. This region is our home, it is also a targeted region for “large-landscape-engineering” initiatives.

What is the definition of initiative? noun: an introductory act or step; leading to action

*In recent years we have learned how dangerous environmentalist’s INITIATIVES can become (see Connections).
*They involve large landscape scale proposals integrated within other projects.
*The failed national monument designation effort is a recent and prime example.
*It was called The Island Park Caldera National Monument INITIATIVE (IPCNM).
*Now there is a new proposal being introduced here, it is called The Island Park Safe Wildlife Passage INITIATIVE (IPSWPI).
*Regional NGO’s are behind this effort. These groups are dedicated to a common goal….

CONNECTIVITY.

*It is the desire of these NGO’s to join Yellowstone National Park, the Crown of the Continent, across the Greater Yellowstone Eco-system located in the Heart of the Rockies, by westward definition, the High Divide Region—which includes The Henry’s Fork of the Snake River, on to Central Idaho. The connectivity is to be accomplished through Fremont County (ISLAND PARK).
*Look at 3 map examples I have included that highlight the CONNECTIVITY goal. From there the plan enlarges to go on to the Yukon (Y2Y).
*Once across the highway and beyond, the target is Mt. Sawtelle and on to The Centennials. Land designations and acquisition are an ever-dynamic threat. "...on a "landscape scale. Our region of focus straddles the Continental Divide along the Idaho-Montana state line and is the center of connectivity between the Greater Yellowstone, Crown of the Continent and Central Idaho. "Heart of the Rockies
*JUST an OVER or UNDERPASS across Hwy 20 to mitigate vehicle/animal collisions, might be a worthy idea? I would like to add two points: (1) this section of Hwy 20 is NOT where a large concentration of animals have historically crossed (it misses by about 4 miles) and (2) from Chester north to the Montana line wildlife cross the highway in many other higher priority locations, and frankly, wherever they chose to cross at a given time and under given conditions.

It is what lies beyond that proposed land bridge that concerns me.
*A safe passage CORRIDOR will in fact be needed.
*Wildlife will be ‘encouraged’ to travel unmolested as they are artificially ‘directed’ to access the land bridge. Such a condition will require restrictions to successfully create it. Will restrictions need to apply to: Hunting? Fishing? Public access?
*How much acreage will need to be involved?
*It is private land on both sides of this section of highway where the ITD project is being considered.
*Land bridges require miles of fencing along both sides of the road to help herd-direct-force wildlife to cross at a certain location. These are the realities that accompany a successful ‘land bridge passage’ project.
*I asked a question about ‘mission creep’ potential for this proposal.
*Would it involve needing lands and restrictions beyond just the over/under pass crossing the highway?
*Part of the reply to my questions were “such factors would be necessary to help guarantee it’s success and additional lands on both sides of the highway corridor would need to ‘be secured’ before several millions of dollars of investment in the project would be viable and attractive”.

http://www.hflp.org/partners/
*Now the project becomes a much larger one, involving far reaching implications. There was NO PUBLIC PARTICIPATION in the inception or design of this proposal. *ITD funds were spent ($60,000) toward a ‘study’ to support the over/underpass solution. *An NGO scored-and prioritized the Cramer study.

*The Public comment period for this proposal is now ending. *It began December 15, 2016, was originally to run a mere 30 days, was extended by 2 weeks, and will now end January 30, 2017.

*This comment period and December meeting constitute THE ONLY local-public participation in the project to date. This comment period has conveniently occurred during the busy Christmas and New Year holidays, has been sparingly publicly promoted, and is supposed to constitute a vital component of the ES (environmental study). *There was a public meeting held in December on an inclement weather day to present a completely prepared proposal. All of this is happening when the yearly population of Island Park is at its lowest.

*Timing is questionable in my mind. A land corridor and bridge passage across Hwy 20 is not as effective to accomplish CONNECTIVITY as a national monument designation would have been, but perhaps...almost?

Connections:
Allow me to restate:
*In recent years we have learned how dangerous environmentalist's INITIATIVES can become.
*The Island Park National Monument Initiative partnered with/has been hidden inside of a HUD-DOT-EPA grant.
*The Island Park Safe Wildlife Passage Initiative is seeking to partner with a proposed Idaho Transportation Department scheduled roadway project.
*Both INITIATIVES involved/involves large landscape engineering potentials, large acreages, and natural land and wildlife resources. (see target area maps)
*Both INITIATIVES did/do NOT involve the people that live here in any part of their inceptions-planning processes or project design.
*Both INITIATIVES were put together, were put into motion, and were introduced by outside ‘special interests’.

These dedicated groups form a collaborative community of regional NGO’s (Non-governemental organizations) who work together toward common goals and often share funding sources was well.
*There are local faces involved, but THE SOURCES that are the power of influence behind these ‘initiatives’ don’t live here.
*In the promotion of this safe wildlife passage project an ITD 20-year study is mentioned, but does not exist. This information is in fact, a compilation of separate data and analysis.
*The “local” project leader for the safe wildlife passage INITIATIVE was first introduced to me as the Idaho Conservation League representative in eastern Idaho.
*The Idaho Conservation League hosted (in it’s Boise offices) the launch of the failed Island Park National Monument INITIATIVE.
*A report is credited to support this wildlife passage proposal, The Cramer 2016 report. Dr. Cramer is considered an expert in this field and her credentials are impeccable. Her report is also based on the scoring priorities provided by the Henry’s Fork Legacy Project. (see map)
*Headwaters Economics is also credited in this report. They were involved in the background of the failed national monument effort.
*Headwaters Economics is an off-shoot of the Sonoran Institute.
*The Sonoran Institute funded the now defunct NGO Yellowstone Business Partnership, which was directed by Jan Brown for years. Brown was the special project manager of the failed national monument INITIATIVE.
*The Sonoran Institute has been working for almost a decade to have influence on the development and planning processes in Fremont County. Search Fremont County Comprehensive planning to find them.
* The Henry’s Fork Legacy Project scored the priorities of the Cramer report, they are funded by Future West.
*Future West is funded by the Brainerd Foundation.
*You will find Future West under the Brainerd Foundation’s placed based conservation efforts. (Map)

• The Brainerd Foundation was on Jan Brown’s national monument initiative tour. *The Brainerd Foundation provides funding for many of the NGO’s operating in our region.

All you need to do is follow the money, study their websites, and look at the maps. I encourage ITD to do so.
While this section of Hwy 20 IS NOT a historically prime location for wildlife migration, it does provide THE PERFECT location for a highway safe passage project initiative that is much desired by regional NGO’s to help them achieve their CONNECTIVITY GOALS. Thank you for your consideration of my remarks.

I would like to share my comments on the proposed expansion of Highway 20 at Targhee Pass. I believe strongly in the safety of both the humans and wildlife that travel this corridor. In the interests of reducing the deaths of animals that use this stretch as they move in and out of Yellowstone National Park, I urge you to take safety measures into consideration from the outset as you plan, budget and engineer this project. Please consider overpasses, underpasses, fencing, lower speed limits or other mitigation efforts into your plans as the project moves forward. New research from Montana shows that widening roads and increasing speeds results in more accidents with wildlife. And research in Canada recently showed up to 80 per cent of animal/vehicle collisions can be prevented by including safety measures and escape methods for them.

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I would like to share my comments on the proposed expansion of Highway 20 at Targhee Pass. I believe strongly in the safety of both the humans and wildlife that travel this corridor. While I do not live directly near that area, I travel there with some frequency and care about my safety. I also greatly appreciate wildlife and understand their need for safe connectivity across fragmented landscapes. In the interests of reducing the deaths of animals that use this stretch as they move in and out of Yellowstone National Park, I urge you to take safety measures into consideration from the outset as you plan, budget and engineer this project. Please consider overpasses, underpasses, fencing, lower speed limits or other mitigation efforts into your plans as the project moves forward. New research from Montana shows that widening roads and increasing speeds results in more accidents with wildlife. And research in Canada recently showed up to 80 per cent of animal/vehicle collisions can be prevented by including safety measures and escape methods for them. This is an opportunity to make our roads safer for the people and wildlife that encounter them.

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Please consider my comments and thoughts on the proposed expansion of Highway 20 at Targhee Pass. I believe strongly in both the planning process. I have traveled this road often and have seen (and heard of) many animal/car accidents. For each accident, there are surely several passings that go without observation or incident. In the interests of reducing the deaths of animals that use this stretch as they move in and out of Yellowstone National Park, I urge you to take safety measures into consideration from the outset as you plan, budget and engineer this project. Please consider overpasses, underpasses, fencing, lower speed limits or other mitigation efforts into your plans as the project moves forward. New research from Montana shows that widening roads and increasing speeds results in more accidents with wildlife. And research in Canada recently showed up to 80 per cent of animal/vehicle collisions can be prevented by including safety measures and escape methods for them. This is an opportunity to make our roads safer for the people and wildlife that encounter them. It is also an great opportunity to set the stage for continued functional environmental planning/engineering. Thanks so much for reading - good luck with the project.

I would like to share my comments on the proposed expansion of Highway 20 at Targhee Pass. I believe strongly in the safety of both the humans and wildlife that travel this corridor. Yellowstone is so special, like no other place on Earth, indeed it is the Crown Jewel of our National Park system. Four million people visit Yellowstone each year to view the magnificent wildlife. Wolves, grizzlies, moose, elk, bear, and many other species call this area home, and everything possible must be done to ensure their habitat remains safe and secure. Wildlife, and their wild land, must be a key factor when considering road safety. In the interests of reducing the deaths of animals that use this stretch as they move in and out of Yellowstone National Park, I urge you to take safety measures into
consideration from the outset as you plan, budget and engineer this project. Please consider overpasses, underpasses, fencing, lower speed limits or other mitigation efforts into your plans as the project moves forward. New research from Montana shows that widening roads and increasing speeds results in more accidents with wildlife. And research in Canada recently showed up to 80 per cent of animal/vehicle collisions can be prevented by including safety measures and escape methods for them. This is an opportunity to make our roads safer for the people and wildlife that encounter them.

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I am writing you because I am concerned about the amount of wildlife deaths on this stretch of highway. I am an avid supporter of wildlife and believe strongly that we must preserve these populations anyway we can. The highway dept. of Idaho has a great opportunity to cut wildlife deaths in this area significantly (research in Canada shows up to 80 percent). Please design this road with underpass/overpass areas with fencing that can bring a safe corridor for these animals......These animals connect to Yellowstone park and are part of the wider Yellowstone ecosystem. They need our protection. Thank you for your time. I am e-mailing my comments on the proposed expansion of Highway 20 at Targhee Pass to you, because I strongly believe in creating the safe passages for both humans and Wildlife who live and travel in this corridor. To dramatically reduce the number of Wildlife deaths on this stretch of highway as they travel in and out of Yellowstone National Park, please incorporate safety measures into the planning, budgeting and engineering design for this project. Please also include overpasses, underpasses, fencing and lower speed limits along with other mitigation efforts into your plans as the project moves forward. New research from Montana shows that widening roads and increasing speeds results in more accidents with Wildlife. Also, research in Canada recently showed up to 80 percent of Wildlife/vehicle collisions can be prevented by including safety measures and escape methods for Wildlife. This is an opportunity to not only create safer transportation corridors for the people and Wildlife that use them, but to also produce a prototype for future transportation safety corridors.
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<td>56</td>
<td>I would like to share my comments on the proposed expansion of Highway 20 at Targhee Pass. I am strongly in favor of working towards ensuring the safety of both the humans and wildlife that travel this corridor. In order to reduce the deaths of animals that use this stretch as they move in and out of Yellowstone National Park, I urge you to take safety measures into consideration from the outset as you plan, budget, and engineer this project. Please consider overpasses, underpasses, fencing, lower speed limits or other mitigation efforts into your plans as the project moves forward. New research from Montana shows that widening roads and increasing speeds results in more accidents with wildlife. Research in Canada recently showed up to 80% of animal/vehicle collisions can be prevented by including safety measures and escape methods for them. This is a great opportunity to make our roads safer for the people and wildlife that traverse them.</td>
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<td>I am writing to comment on the widening of the Targhee Pass road. The safety of both humans and wildlife matters to me, and should be taken into consideration from the very start of this project. Being so close to Yellowstone, this road feeds visitors in and out of the park. Research also shows it’s a hot spot for wildlife/vehicle collisions. Wolverines, grizzlies, moose, elk and more cross this highway regularly. According to research, widening roads and increasing speeds results in more wildlife collisions, while over- or underpasses and warning systems have been proven to decrease these collisions by up to 80 per cent. But these have to be built into plans early on. I urge you to include overpasses and/or underpasses in your plans from the very beginning.</td>
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<td>Vehicles and animals do not mix well, as we all know. Collisions with animals, large or small, create dangers for humans and sometimes death to both the animal and occupants of the vehicle. Since endangered animals are also a factor in the need for safe wildlife crossings, I want to add my support for taking action to make these crossings a reality. It is a growing necessity with the increase in the human population and a decrease in wildlife habitat and numbers. Please do whatever you can to make wildlife crossings a top priority.</td>
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<td>I love to visit Yellowstone and can’t count the times I’ve visited with my four children as they were growing up or solo as I do now. I travel to Yellowstone to experience its wild grandeur and its wildlife, and I always travel over Targhee Pass enroute. Please build these life-saving overpasses for wildlife on Targhee Pass; this single project will have a huge impact on conservation measures throughout this large and important wild region. It will also help save human lives by preventing vehicle collisions with large animals.</td>
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<td>This message is to convey my thoughts regarding the proposed Idaho Transportation Department upgrade to US 20 in the Island Park area from the State Hwy 87/US 20 intersection to the Montana state line. I live in Idaho Falls and fairly often travel that route from Idaho Falls to Bozeman Montana. I am familiar with the fact that the section of road in question is an important corridor for elk, deer moose, black bears, grizzly bears, pronghorn antelope, wolves, and wolverines as they migrate through the area. There were at least 17 documented wildlife/vehicle collisions there between 2010 and 2014. And, a grizzly bear (endangered species) was killed there in 2015.</td>
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According to an ITD-contracted study from 2016, “this area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park.” For the safety of drivers and wildlife, I feel there needs to be strong consideration for inclusion of a wildlife crossing, either a tunnel under the road or a wildlife overpass, similar to what is on US Highway 191 near Pinedale, Wyoming. It may not require as large an overpass such as on US 191, but something similar in concept. There would certainly have to be appropriate fencing along the highway to “encourage/direct” wildlife to use it.

Please consider my comments on animal interfaces with traffic on Hwy 20 from Junction 87 to Montana border. I strongly urge you to consider over/under corridors for animal migration. These animals are a valuable asset to our state and region. Protecting them should be a state fish and game goal as well as an ITD goal. Controlled corridors will also help solve a safety issue of animal collisions causing property damage and bodily injuries. I realize these additions are expensive, but in the long run they are worth the extra costs. I for one don’t mind the extra costs.

We have frequently driven Highway 20 to and from Idaho Falls. While we agree improvements need to be made, we strongly urge that plans include ways to prevent animal/car incidents. Please, please make sure this road is safer for both humans and animals.

On behalf of the Henrys Lake Foundation, I believe you are taking the right steps to address the protection of wildlife in the proposal area. Although you identify the area as a wildlife hot spot in conjunction with other highway improvements, there are several other wildlife hot spots that could also be addressed as part of a more comprehensive strategy. Unless these other key hot spots are addressed concurrently we may just be moving the problem. In addition, there may also be some economy of scale benefits if a wildlife overpass or underpass design and construction could be used in one or two other hot spots of similar terrain. For example, the wetland Spruce area of Highway 87 near the Henrys Lake Road exit. So in addition to the great work already done, wouldn’t it make sense to expand the scope of the study to determine other hot spot synergies and a strategy to address them?

As planning goes forward out on Highway 20, be sure that you build in wildlife underpasses and overpasses as well so that the people traveling along there do not get killed by hitting a moose, a griz, or any other wildlife.

Hello. My husband and I live in Island Park and I would like to comment on the current ITD plan for changes to Hwy 20 between milepost 402-406. Please implement the safe wildlife passage on Targhee Pass as recommended in the ITD commissioned wildlife study “Safety Solutions for Wildlife Vehicle Collisions on Idaho’s US 20 and SH 87 (Cramer 2016). This study recommends implementing wildlife overpasses and the associated fencing that goes with these. Lower the speed limit on Hwy 20. The cheapest and easiest way to keep this section of the road safe is to lower the speed limit. Slower speeds are safer for both humans and wildlife. This part of US Hwy 20 is of the greatest wildlife connectivity value of any stretch due to how it bisects wildlife movements into and out of Yellowstone NP. These iconic wildlife are important to Idaho’s economy, culture and quality of life. Traffic on Hwy 20 is increasing as more and more people from around the world travel to the Yellowstone region to enjoy the spectacular wildlife that is found here. Wildlife must be mitigated for in ITD projects. The cheapest way to do this is to design and engineer safe wildlife crossings at the beginning of any road project. I urge you to follow the recommendations and results from the studies you have commissioned, and take this unique opportunity to build safe wildlife passage into this stretch of Hwy 20 for the long term future of highway safety in the area of Island Park. Thank you for the opportunity to comment on this project.
I have reviewed the information provided on the IDOT web site and, as a local home owner, understand the need for road improvement. I have the following comments on the proposed road improvement plan between mileposts 401.5 and 406.3.

1. This area is a wildlife migration corridor and environmental assessment must include wildlife types and uses. I have seen first hand the impact of wildlife-vehicle collision (WVC) on this road, with loss greatest to wildlife. As stated in a recent ITD contracted study “Safety Solutions for Wildlife Vehicle Collisions On Idaho’s US 20 and SH 87 (Cramer, 2016): “This area is of the greatest wildlife connectivity value of any stretch of US 20 due to hoe it bisects wildlife movements into and out of Yellowstone National Park and large scale regional movements of carnivores such as grizzly bear and wolverine as they move to and from other ecosystems to the east and west, southwest, ad southeast. Thus animals in this area are of greater potential danger for WVC as are the humans traveling this section of road”. Increasing traffic into and out of YNP on Hwy 20 will result in more wildlife losses potentially altering wildlife migrations in the Yellowstone region.

2. It has been well documented that widening roads and high speed limits severely limit wildlife movement across roads that are in traditional wildlife migration and movement corridors. I recent study by Haujser 2016 is a good reference. The impact of widening the road in this area to wildlife movement and migration must be adequately assessed and addressed.

3. The EA must consider WVC and mitigation as part of the alternatives, i.e., wildlife over- and under-passes, which have been proven to be highly protective of wildlife (reducing WVC 80-90%), especially wildlife that do not readily use underpasses such as Pronghorn Antelope. The States of WY, MT, and WA have used over- and under-passes with success.

4. Including wildlife over- and underpass options in the EA makes will also make roads safer for the motoring public.

5. By including wildlife over- and underpass options in the EA it provides an opportunity for ITD to provide mitigation for WVC in the initial phases of the project when it is most cost effective; planning, budgeting, and engineering.

6. In addition to the WVC mitigation speed limits along this stretch of road should be reduced to keep wildlife and humans safe. Everyone is always in a hurry, but a 55mph speed limit over the course of appx 5 miles is inconsequential to travel time. People from all over the world travel to YNP to view its wildlife. We need to make sure that we provide appropriate protection for wildlife and for people so that wildlife survive and people can enjoy the wildlife they have come to see. Thank you for the opportunity to comment on this project.

I’m an animal advocate. Main concern is that this a route where wildlife can get hit and or killed. Would like to see fencing to prevent wildlife from crossing the road. Need to block crossing. Construct or install fencing. Collisions with wildlife is a danger to the drivers as well. ITD should take preventative measures to prevent this as well.

I have a home in Island Park and would like to make a public comment on the current ITD plan to re-do this stretch of Hwy 20 (mp 402-406) in Island Park. I travel this road frequently during the summer and fall and have noticed that traffic has increased in the last couple of years, as more people travel by car to visit Yellowstone National Park. Also this portion of the highway has seen an increase in incidences of animal and vehicle collisions. I feel the most effective method to improve safe wild passage would be an overpass or underpass. This would be the prefect time to built this into the initial planning and budget. I would hope that you would follow the recommendations from the study.

As a frequent visitor to the Island Park–Yellowstone area, and as the Executive Director of Western Wildlife Conservancy, a non-profit organization in Utah, I strongly urge the Idaho Department of Transportation to construct a safe passage for wildlife on US 20 at Targhee Pass as part of Project 14054. I have visited Island Park and the greater Yellowstone country every summer for approximately the last 40 years, often spending a couple of weeks at a cabin in Island Park. As you know, this area is a national treasure. I never tire of its grand vistas, fascinating geology, and iconic wildlife. Over the years, I have observed a tremendous increase in both the volume
of automobile traffic on US 20, and, sadly, increased vehicle speeds as well. In the last 10 years I have found two
dead young bull moose on the highway, velvet antlers mangled and bleeding, lying beside the highway where they
had been struck by speeding tractor-trailer rigs. One was within 100 feet or so from the Buffalo River Bridge, and
the other within 100 feet or so of the Henry’s Fork Bridge. A family member was a passenger in a car that struck a
moose on the road over Targhee pass some 25 years ago, but fortunately he was not injured. Targhee Pass is a
particularly vital wildlife movement corridor for deer, moose, bears and wolverines, among others. Unfortunately,
their lives are at risk each time they attempt to cross, as are the lives of people in passenger cars, a situation that
is sure to become even more hazardous in the coming years unless we begin to take proactive measures to reduce
the hazard. Imagine how visitors to Yellowstone will perceive new, state-of-the-art landscaped overpasses for
wildlife on Targhee Pass! They will be a symbol of the pride our nation and the State of Idaho take in the crown
jewel of our national park system. Even more important, our wild animals, including rare species such as the
wolverine and the Canada lynx, will benefit from it, as will people who travel the highway – many of them
traveling to Yellowstone National Park hoping to see some of these very species of animal. Now we have a rare
opportunity to help the animals and the visitors. Let’s do it.

We are frequent visitors to Yellowstone Park, and frequently enter from Hwy 20. We have heard you are going to
expand the highway and we urge you very strong to fund efforts to mitigate wildlife collisions with cars. There are
so many things that can facilitate wildlife migrating pass this highway, protecting the wildlife and preventing
collisions. It is important that this be planned for before widening the highway.

Please take the time and funds to build in safe crossings for all wildlife on the Hwy 20 expansion. It would mean
saving lives for both the wildlife, who needs to be able to safely migrate, and people driving the HWY. It is
inevitable that wildlife will cross. Why not make it safe for all.

I’m writing to add my voice to those advocating for wildlife collision mitigation measures on Highway 20 at
Targhee Pass. Well planned underpasses, overpasses, and highway fencing can reduce wildlife-vehicle collisions by
as much as 90%, as recent studies in Banff National Park have shown. A reduction in collisions of that magnitude is
a massive victory for public safety and public finance, while also reducing the emotional toll on drivers, families,
and the transportation workers tasked with clearing accident scenes. Helping animals cross highways safely,
meanwhile, means wildlife populations are better connected, have better access to genetic diversity and the
resilience that connotes, and are more productive. Whether hunter or hiker, photographer or trapper, healthy
wildlife means more recreational opportunities for everyone. Mitigation measures are much easier and less
expensive to implement when roadways are planned with them in mind, and it doesn’t take very long for them to
pay for themselves. Thank you very much for spending time with my suggestions, and all the best in the planning
process.

I am writing to comment on Targhee Pass. I am very supportive of the proposal to build three overpasses for
wildlife on Targhee Pass. These overpasses are important to save both human and wildlife lives by preventing
collisions. Thank you for considering my comment.

It is in the interests of both hunters and wildlife photographers as well as motorists to prevent fatal wildlife
collisions. We know that over- or underpasses and warning systems have been proven to decrease these collisions
by up to 80 per cent. These MUST be built into plans at the beginning in order to be cost effective. We very
strongly encourage you to include the above in your plans.

We fully support creating safe wildlife passage in this critical wildlife corridor that is part of the Corridor
connecting the southern and northern Rockies with the Greater Yellowstone Region. Our organization works on
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<td>habitat integrity for wildlife in the area of this connection between the Greater Yellowstone Ecosystem and the Uinta Mountains in Utah. Creating safe passage on Highway 20 is a great first step in allowing wildlife migration for many species. We look forward to other projects in our area, particularly the Bear River Range in Idaho.</td>
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<td>Experiencing wildlife in the Greater Yellowstone area is among life’s exquisite treasures for me. Wildlife roamed here long before the first Native or white settlers, and it seems helping wild creatures survive is the least we can do after decimating so much of their habitat. I have visited the Greater Yellowstone area and driven US 20’s Targhee pass many times, and I’m grateful for the beauty and wildness that remain. Please build life-saving wildlife overpasses on Targhee Pass. In addition to saving elk, deer, wolves, cougars, and wolverines, it will also help save human lives by preventing vehicle collisions with large animals.</td>
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<td>I am writing to urge you to consider wildlife crossings from the outset as you work on widening Highway 20 near Targhee Pass. There are many options available to improve safety for wildlife and people: overpasses, underpasses, fencing, and reduced speed limits. The Greater Yellowstone area is one of the last, best places for wildlife in the United States-please help keep it that way.</td>
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<td>I urge you to install enough wildlife crossing ramps (I understand three have been suggested) during the reconstruction of Targhee Pass. I totaled a Toyota 4-Runner in southeastern Utah when a herd of elk were standing in a road crossing on Hwy 191. Hitting elk can kill drivers if the elk come back through the windshield. Some drivers are killed swerving to avoid elk or deer. And of course, there are the wildlife that are killed simply because we place highways across their migratory routes. Wildlife crossing ramps and bridges and underpasses have been shown to be effective; wildlife use them; and human and wildlife lives are saved. Thank you for considering this comment.</td>
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<td>I lived in Montana for many years and particularly enjoyed spending time in the areas accessed by Targhee Pass. It has come to my attention that there is the possibility of constructing wildlife overpasses to assist in safe passage for many species that use this wildlife corridor. Not only is it important for the Yellowstone ecosystem, it translates to the broader issue of preserving and enhancing wildlife corridors from into Canada south to Mexico - the greater Rocky Mountain linked-chain of corridors. I am a retired Soil Scientist and Certified Wetland Specialist that worked on a number of highway reconstruction/upgrade projects in Montana and know that the scientific studies support the effectiveness of wildlife impact mitigation measures such as overpasses. Also, wildlife-vehicle collisions are significantly reduced thus saving lives and dollars. Thank you for the opportunity to comment.</td>
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<td>Please do all you can to insure wild life has a way to pass through man-made obstructions safely.</td>
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<td>As you study the expansion of Highway 20 at Targhee Pass, please consider the idea of wildlife corridors! Overpasses, underpasses, fencing, lower speed limits, and other mitigation efforts reduce vehicle/wildlife collisions, improve safety for drivers, and decrease the deaths of animals that use this stretch as they move in and out of Yellowstone National Park. In case you aren’t aware of the US-101 Liberty Canyon Wildlife Crossing project in California, here is the website: <a href="http://www.dot.ca.gov/d7/projects/libertycanyon/">http://www.dot.ca.gov/d7/projects/libertycanyon/</a></td>
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<td>Please allow all wildlife to safely cross the highway at Targhee Pass. We share this area's beauty with the animals. Please support the construction of 3 overpasses.</td>
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<tr>
<td>84</td>
<td>Please include wildlife under or overpasses in this project design.</td>
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<td></td>
<td>In regard to the Hwy 20 expansion on Targhee Pass, I strongly urge ITD to plan for safe wildlife passage elements in the design and construction. Because of the high numbers and variety of wildlife that use this area as a migration corridor, it is essential to implement safe passage both above and below the highway. Having multiple safe passage routes above and below the highway will allow the greatest number of different types of animals to migrate safely. As has been demonstrated and implemented in Canada and many locations in the US, some animals prefer to cross over highways on elevated passages and others prefer traveling under highways. These systems have significantly decreased the number of animal and vehicle collisions making traveling safer for both migrating animals and humans. While the cost of implementing these safe passages may seem high initially, they become very economical in the long term by making travel safer for both humans in vehicles and migrating animals. Please consider safe passages in the highway expansion plans for Targhee Pass. Thank you.</td>
</tr>
<tr>
<td>85</td>
<td>Being an amateur Idahoan wildlife photographer, I would greatly appreciate wildlife mitigation items have top priority in the future expansion design of Targhee Pass. Keeping our native animals safe, and allow to prosper, would greatly increase the opportunity for both the locals and tourist to see these magnificent creatures in their natural environment. Thank you for your time.</td>
</tr>
<tr>
<td>86</td>
<td>Targhee Pass - Comments on the Purpose and Need: Pg. 3 Wildlife and Fish Resources and Habitats. We strongly encourage mitigation of the fractionated habitat a major road plays in the migration corridor for big game. Every effort should be made to ensure continuity of habitat for wildlife. Pg. 4 Cultural Resources and Native American Consultations Please revise the statement to include the Shoshone-Bannock Tribes. &quot;Efforts to avoid, minimize, and mitigate potential effects will need to be made in consultation with the Idaho State Historic Preservation Officer and the Shoshone-Bannock Tribes of lands within their inherent and ancestral area.&quot; Please include the word “flight” to the Nez Perce (Nee-Me-Poo) National Historic “Flight” Trail. Without using the term flight it misleads the public to believe the area as part of the Nez Perce lands.</td>
</tr>
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<td>87</td>
<td>It is imperative that you plan for wildlife safety as part of the expansion of Hwy 20. I have seen wildlife attempting and failing to negotiate that busy highway. It is a tragedy for both the wildlife and the humans involved. You have the opportunity to improve safety for both and it would be foolish to waste it. It may cost more to in the short term to construct the highway for wildlife safety. However, in the long term I am certain the property damage to vehicles and loss and injury to human and wild life will more than make up the difference. You must include wildlife safety as a consideration in planning, budgeting and engineering this expansion.</td>
</tr>
<tr>
<td>88</td>
<td>I am very familiar with the Targhee Pass and Yellowstone. It is one of my favorite places. Please protect the beautiful wildlife of the area and build wildlife overpasses. This is important. We must allow for safe passage for all animals. It is absolutely the right thing to do. Thank you!</td>
</tr>
<tr>
<td>89</td>
<td>My wife and I live in Island Park at Henrys Lake. We would like to make a public comment on the current . My family and neighbors travel this stretch of road frequently during most of the year, in all seasons, including snow/ice periods, busy summer tourist season, and both spring and fall wildlife migrations. The current ITD plan to re-do this stretch of Hwy 20 (mp 402-406) in Island Park bisects a known important wildlife corridor for both moose and elk. Further, important wildlife such as grizzly bear and wolverine, wolves, pronghorn, and deer are resident in this area. This area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park. Over the years, private and commercial</td>
</tr>
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</table>
Traffic through Island Park to YNP has greatly increased. This has resulted in road safety issues as well as wildlife vehicle collisions (WVCs). The majority of the drivers coming thru this area are not familiar with the hazards inherent in traveling through wildlife corridor territories. ITD has commissioned various studies of this area, including a WCS report on large mammal migration routes (elk and moose), has placed wildlife cameras in the area to determine wildlife movement across US 20, and a study by a recognized road ecologist (Safety Solutions for Wildlife Vehicle Collisions on Idaho’s US 20 and SH 87, Cramer 2016) on how to best mitigate WVCs (reduce them by as much as 90%) and make the road safer for both vehicles and animals. Recommendations from these reports identify mitigation methods that would greatly improve road safety on US 20. Wildlife such as ours is much treasured in the lower 48 states. Tourists (both foreign and domestic) travel to see and enjoy the wildlife/natural beauty that is abundant here. It is a huge economic contributor to the regional local businesses and the state of Idaho. Many local businesses would disappear without this tourist draw. The most cost effective method of installing methods to improve the roadway for safe wildlife passage (SWPs)-overpasses and underpasses, and wildlife detection systems- would be at the time the road is already being rebuilt, such as this stretch of US 20 is now. This is an unprecedented opportunity for ITD to build mitigation for wildlife into the initial planning, budgeting, and engineering process for this project from the outset. Now is the time! Wildlife mitigation measures have been shown to reduce WVCs by 80-90%, improving road safety for all travelers as well as wildlife. Wildlife, especially endangered species, must be mitigated for in ITD projects. We support the recommendations and results from the studies you have commissioned. This unique opportunity to build safe wildlife passage into this stretch of Hwy 20 for the long term future of highway safety in the area of Island Park. Thank you for the opportunity to comment on this project.

We are full time year around residents of Island Park Idaho, and live within earshot of US 20, our "main drag." We want to see the state and federal government take steps to protect the many animals who also use US 20, going either along it, or across it. These wild animals do not know the rules of the road, so they happen into problems among the traffic. Their "main drag" is an eons old migration route, which passes from the Yellowstone Park area, taking them across US 20 and south west into their warmer wintering territory. Some of them go to the sand dunes near St Anthony ID. One of our friends was seriously injured while removing a dead deer near the Howard Springs Wayside on US 20. A group including local and state law enforcement officers and our friends were moving the deer when a driver clearly out of control ran right into them. Speeds of 70 or more are normal even on that dangerous curve near Targhee Pass and the state line. Traffic includes passenger cars, tour buses, and many large 18 wheelers. Nearly all of the traffic is "passing through," is bigger and stronger than the animals. The drivers are interested in getting to their destination as fast as possible. Those of us who are local are appalled at the speed and careless driving, and of course at the carnage beside the road. Bodies of moose, elk, deer, antelope, bears, foxes, coyotes, pine martens, porcupines, raccoons, and smaller critters can be seen at all times of the year. Sadly, also vultures, ravens, crows and magpies are hit as they try to scavenge. In addition our precious trumpeter swans cross in the late summer with their cygnets to get to the Henrys Fork River. The cygnets cannot fly yet, so have to cross the road on foot. Several years ago we marveled that a family of 6 (2 adults, 4 non-flying cygnets) made it safely across US 20 from Swan Lake to the river, at about mile marker 376-377. Please PLEASE help the animals! Certainly the model of the Flathead Indians' many "Bridges for the Animals" along US 93 could be used on US 20, as could underpasses designed for them. Perhaps slower speed limits in the highest density crossing sites (identified by Idaho Master Naturalists in a study in the last few years) might help mitigate this problem. Animal/vehicle collisions are also expensive: our neighbors ran into some elk crossing 287, and totaled their car. Fortunately they walked away, as did two Huskies in the back of the car. The elk did not. Other activities along US 20 put humans at risk: hikers, cyclists, ATVers, and snowmobilers are hit, as are people repairing tires, or otherwise stopped along the road. In fact last summer we saw two people nearly hit crossing at Osborn Bridge. They were intent on taking photos of a moose in the river, and did not even look as traffic bore down on them from both directions. Thank you for your work with this issue, and I am sorry to be so late in responding. Let me know how I can help, in any way.
I appreciate the overall intent of the project BUT can only support said project IF vehicle/wildlife collisions be mitigated by wildlife under and/or/over passes. Thank you for your consideration. Also, as a commuter from Ashton Idaho to Idaho Falls and back daily, I have real concerns with the safety and condition of the approximately 11 mile two lane section of US 20 between Ashton and St. Anthony. I would love to hear your plans for turning this dangerous section of road into a four lane highway.

I am a homeowner north of Island Park, and am commenting specifically on ITD Project 14054, Targhee Pass, an $11 million project for construction in 2021. I drive this stretch of highway a few times per week. I am concerned about potential shortcomings in human safety of this new project, due to excessive speeds at night and high risks of vehicle collisions with wildlife. I think speed limits at night can be too high. Drivers coming into Idaho on Highway 20 from Montana will have just gotten of a 70 mph limit racing up a passing grade to the summit, and be disinclined to slow down while going down a 1-2-mile straight stretch in Idaho. This speeding, especially at night risks loss of control and tragic high-speed accidents. Consider very plain marking of the speed limit and lower the limit 5-10 mph at night, especially during late fall through spring. I am also concerned about human safety due to vehicle collisions with wildlife, especially with an additional lane and at night. Wildlife will have to cross three lanes of pavement, 50% more than currently, and be on the road longer. Longer time on the pavement increases chances of being hit by a truck or car relative to current conditions, especially at night. As it is, I understand that nearly 1 of 4 vehicle accidents on US 20 through Island Park are due to wildlife collisions - 500% of the national average. The human injury associated with these accidents horrific, and even more tragic if they can be reduced and aren't. Some of us, such as Karen Duncan, personally know people who have been turned into quadriplegics by vehicle collisions. I was an ambulance attendant and saw the terrible effects of vehicle accidents first hand. Project 14054 can reduce collisions by reducing wildlife use of the pavement. This 14054 section is frequently crossed by elk, moose, mule deer, pronghorn, grizzly, and wolverine. I've often seen animals hit by vehicles lying dead by the roadside during the day. At night, the fear for my safety due to colliding with crossing wildlife goes way up, as these wildlife are extremely difficult to see, especially at night. Wildlife mitigation measures, including wildlife overpasses and underpasses have been shown to reduce collisions by up to 90%. I understand that an expert report commissioned by Idaho Transportation Department recommends such measures on the section of road addressed in Project 14054. Here are opportunities to improve safety more in building this project. So, I strongly urge you at ITD to improve human safety by building wildlife underpasses and overpasses as merited into Project 14054 to keep wildlife off of the pavement. Please incorporate such crossings for wildlife, and reduced nighttime speed limits, into the initial planning, budgeting, engineering process, and ultimately into construction, for Project 14054 at Targhee Pass, to improve human safety.

I am writing to express my support for incorporation of a wildlife overpass or underpass to any modification of the four-mile stretch of Highway 20 scheduled for expansion and modification. Expansion of the highway to include a truck lane will only increase speeds and the likelihood of wildlife-vehicle collisions. Safe highway passage must be provided for the iconic wildlife of the Greater Yellowstone Ecosystem in order to protect both wildlife crossing the highway and the people traveling the highway. As a taxpayer, I am willing to pay extra to enhance the safety of Highway 20 for both wildlife and humans.

Reports have identified that nearly one in four accidents along Hwy 20 near Island Park involve wildlife, almost five times the national average. I urge ITD to evaluate the opportunity to incorporate wildlife-vehicle-collision (WVC) mitigation measures to reduce collisions between motorists and wildlife along Hwy 20. Doing so will help ensure that residents and visitors alike are able to travel safely over Targhee Pass just beyond the western gateway to Yellowstone National Park, the first national park in the world and the oldest in the United States. NPCA was established in 1919 with the mission to protect and enhance America's national park system for present and future generations. NPCA gives voice to those who support the national parks with over 1.2 million members and supporters. NPCA has a long history of advocating for the protection of national parks and park resources, both inside national parks and on adjacent lands. A large portion of the work conducted by NPCA is developed with an eye to connecting and protecting the iconic wildlife of our national parks, with a focus on adjacent federal, state,
and private lands. We are particularly interested in the proposed project and its potential impacts on Yellowstone National Park (YELL) and park resources.

Targhee Pass Environmental Assessment Scoping: ITD is initiating an environmental assessment (EA) to evaluate the risks, benefits, opportunities, and costs associated with reconstruction of Targhee Pass on Hwy 20. One of the primary purposes of this project is for safety and traffic flow improvement. ITD notes that “wildlife collisions are a known issue, examined in the corridor planning effort and corridor wildlife studies. The study team will be analyzing wildlife effects of alternatives in the study, then looking at appropriate and practical mitigation for alternatives.” This portion of Hwy 20 lies within the migration route of a number of species and is the first major highway barrier that wildlife reaches during western migration from Yellowstone National Park. Wildlife-vehicle-collisions (WVC) impact not only migrating wildlife, but also the safety of motorists. NPCA is encouraged by ITD’s collaborative efforts with Idaho Department of Fish and Game (IDFG) and Dr. Patricia Cramer (see Cramer, 2016) to identify WVC hotspots and potential mitigation efforts. Such efforts improve the planning process of highway projects to enhance both human safety and reduce impact to wildlife. NPCA supports the effort made by ITD to work with stakeholders and other agencies to identify wildlife needs and mitigation strategies throughout the development of the EA. NPCA would like to raise the following points of concern specific to the development of the EA: National Park Service as a Cooperating Agency The proposed project is within close proximity to YELL and will affect habitat that is used by species that move between YELL and eastern Idaho, including grizzly bears which are listed as threatened species under the Endangered Species Act (ESA). NPCA encourages ITD to engage the National Park Service as a cooperating agency to ensure concerns as to the impact the proposed project could have on wildlife are addressed.

Importance of Targhee Pass to Wildlife Movement

Targhee Pass has been identified as a critically important area for wildlife movement, particularly at the landscape level, for several species in the Greater Yellowstone Ecosystem. This four-mile segment is an important corridor for migrating elk and moose (Andreasen et al., 2014 and Grigg, 2007). It is also an important linkage area for mule deer, pronghorn, black bears, grizzly bears, and wolverines (Cramer, 2016; Geodata Services, Inc., 2005; Idaho Department of Fish and Game, 2014; Interagency Grizzly Bear Study Team, 2013). While this area is extremely important for several species, it is also a hotspot for WVCs (Cramer, 2016). Has ITD considered these species and their movement needs during the planning process? What actions are currently being considered by ITD to mitigate the impact that construction in Targhee Pass may have on these species?

Collisions with Wildlife Cost Americans Life, Limb, and Property

Of the approximate 6 million collisions that occur annually in the United States, 1-2 million are caused by vehicle-large animal collisions. This is a critical safety issue for drivers, causing hundreds of human deaths and nearly 30,000 injuries per year. WVCs have also been shown to affect some of our nation’s most treasured and iconic species as travelers cross critical habitat channels such as Targhee Pass. Costs for WVCs are also of significant concern. Personal costs for WVCs including vehicle repair, medical costs, and carcass removal and dispersal can range from over $6,000 USD to as much as $30,000 USD per WVC. In addition, the shared costs associated with WVCs continues to rise, costing Americans over $8 billion each year. NPCA recommends that ITD fully evaluate the impact of WVCs and develop plans to reduce WVCs across this critical wildlife corridor. Increasing Speed Limits Increases the Risk of WVCs Several studies have demonstrated the link between operating speeds on highways and a rise in WVCs (e.g., Neumann et al. 2012). High speeds reduce driver reaction time, putting both drivers and wildlife at increased risk. Found and Boyce (2011) suggest that lower speed limits in areas with high ungulate movement may reduce WVCs. Has ITD considered a reduced speed limit along Targhee Pass as a means to reduce WVCs? Also of concern is the issue of drivers exceeding posted speed limits even in areas where speed limits have been lowered to reduce WVCs. Several studies have shown that standard road improvements, such as widened shoulders and straightened curves, allow for increased speeds and may be associated with increased WVCs, limiting the effectiveness of reduced speed limits as a method of WVC prevention. Has ITD considered the potential impact that highway improvements may have on operating speeds in the area? Is ITD evaluating opportunities to implement highway improvements that discourage, rather than encourage, drivers exceeding...
posted speed limits? Mitigation Measures can Drastically Reduce WVCs. Over forty potential types of WVC mitigation measures have been developed, with varying effectiveness and complexity. Potential mitigation measures range from warning signs and vegetation removal to improve driver visibility to wildlife over and underpasses and automatic detection systems, which may reduce WVCs by 79-97%. A recent ITD-commissioned study, completed by Dr. Patricia Cramer, recommended three wildlife overpasses and fencing along this four-mile segment of road. In her report, Dr. Cramer stated that, “This area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park.” The report recommends the installation of three crossing structures at mile posts 403.2, 404.9, and 406. In association with these crossing structures, the report recommends extensive fencing along the highway (Cramer, 2016). NPCA recommends that ITD evaluate these recommendations in the EA to reduce the impact of WVCs. Mitigation at WVC Hotspots can be Cost-Effective Despite their upfront costs, WVC mitigation measures have been shown to pay for themselves over time through collision cost prevention when installed at collision hotspots, saving taxpayer dollars in the long run. One study (Huijser et al. 2009) conducted a comprehensive cost-benefit analysis of wildlife mitigation measures, establishing break-even points to correspond to a mitigation measure’s cost against the measure’s projected benefits (in avoided costs associated with WVCs). Where mitigation is determined to make sense (based on site-specific conditions), taking steps to prevent collisions and provide safe passage is predicted to save human lives, wildlife, and money—creating a win-win situation. Has ITD assessed the potential break-even points that can be expected utilizing various mitigation efforts? Conclusion This region is visited annually by millions of national and international visitors who come for the abundant wildlife, scenic vistas, and outdoor recreation. Targhee Pass serves as Idaho’s gateway to YELL, and is an important travel route for tourists and residents. The area also plays a vital role in the health of the wildlife of our nation’s first national park and is an important link in Inter-and overpasses with fencing and jumpouts: 94%-97% (Woods 1990), 80% (Clevenger et al. 2001), 87% (Dodd et al. 2007), 90% (Ward 1982). ADS: 82% (Mosler-Berger and Romer 2003), 91% (Dodd and Gagnon 2008). connecting stretches of critical wildlife habitat utilized by the region’s most iconic species. As ITD continues to assess the environmental impacts of projects along Targhee Pass, NPCA encourages the department to prioritize WVC mitigation efforts and to implement recommendations from Dr. Cramer’s report.

REFERENCES


Yellowstone is one of our country’s most magnificent treasures. I travel there to experience the wild grandeur and its wildlife, and I travel over Targhee Pass enroute, where animals can easily be hit by passing vehicles. Please build overpasses for wildlife on Targhee Pass, which will prevent vehicle collisions with large animals. These crossings for wildlife have been proven to save the lives of thousands of animals - in this case those of some that are at perilously low numbers already - as well as the lives and property of humans.

I urge you to do your best to make Idaho’s roads safer for both drivers and wildlife, while preserving Island Park’s economic and cultural heritage.

Concerning Targhee Pass expansion proposal: I am familiar with this area, having spent time there at least yearly for the past 44 years. I have family living and working in the Island Park/Ashton area. This is a well known highly hazardous driving area. I strongly support slowing speeds and/or rerouting truck traffic as a trial (2 years?) prior to the disruptive and costly widening of the road. Please consider studying options like wildlife underpasses/overpasses as well.

Please consider protecting the wildlife with an under/over by pass in the construction project. Seeing the wildlife is a very big reason our family vacations in this area, as I think most people do.

[Map comments from the 12-15-2016 Public Scoping Meeting]  

1. Destination West Yellowstone – Shopping, church, restaurant, movies, fishing, Bozeman, schools, work
2. West Yellowstone: Shop, eat, church, movie, fish, Bozeman, but don’t go N. in winter if local. Locals go south. Locals do go to park

3. Mile Post 406.3 (top of pass): Passing lane transition to Montana is too short. Montana road not maintained as well as Idaho so non locals are unfamiliar with sharp transition

4. Mile Post 406.3 (top of pass): People stop to take pictures of state sign – speeds and traffic make it dangerous with no pullout – crossing the road. Bus traffic up 50%.

5. Mile Post 405.5 (Howard Spring): Truck traffic volumes are high and fast, passing lane would help with this, or sign the slow traffic pullout in advance

6. Mile Post 405.5 (Howard Spring): Boat inspection site – safety with traffic

7. Mile Post 405.3: Elk crossing December

8. Mile Post 404.9: Slight turn but lots of wrecks – shading big issue here

9. Mile Post 404.4: Curve; ice spot due to shading

10. Mile Post 404.4: Unsafe if heading north on highway and turning left onto dirt

11. Mile Post 404.4: Black ice in the area, unfamiliar drivers are surprised

12. Mile Post 404.3: Grizzly bear hit and killed by vehicle in October 2015

13. Mile Post 404.1: Elk won’t cross because of guardrail

14. Mile Post 403.3: Elk crossing – follow 87

15. Mile Post 402.6: Elk crossing in December

16. Mile Post 402.4: Improve speed enforcement, or help

17. State Highway 87: No rumble strips and southbound 87 run through intersection

100

Yesterday I attended a class by presented by Y2Y Kim Trotter on the upcoming Targhee Pass IDT project and possible animal corridors. I enjoy hunting in that area and also would like to gain the Fremont County Commissioner’s support for this initiative. Believe me, everyone (hunters and non-hunters alike) would like to see the numbers of all animal - vehicle accidents reduced or eliminated. I believe that one of the major concerns held by the Commissioners is the negative impact on the hunting business (especially elk hunting) that the funneling effect of wildlife crossings and fencing a large stretch of high way 20 across a normal migration path would have. Because of this concentrating effect large areas currently open to hunting would have to be closed or in some way modified. In the presentation Kim stated that these issues have been dealt with successfully in BC and Montana but didn’t state how. Can you provide me that information?

101 [Comment letter from Idaho Department of Fish and Game 2/8/17, attached]

102 [Comment letter from U.S. Environmental Protection Agency on 3-30-2017, attached]
Gentlemen,

I wanted to make you aware of my second part letter that will appear in this week’s IP News. While some discussion/conversation seems to be focusing on affordability and funding availability, I also have much concern about the permanence of this study’s impact on future ID DOT planning for Island Park/District 6. This study’s recommendations are dedicated to promotion of multiple over/underpass structures.

While the current IPSWP Initiative has selected Targhee Pass for road work and a potential overpass/underpass? solution incorporated into the roadway design, the study also recommends a total of 17 such structures located at multiple sites throughout Island Park. As I have stated, wildlife CONNECTIVITY out of Yellowstone to Central Idaho is not the mandate of ID DOT, and the regional conservation NGO’s who promote this large landscape design should not have been allowed to have such a large impact on an ID DOT study and in the future planning process. A one site specific solution, which is presently being promoted, does not address the wildlife/public safety issue on the entirety of the 63 miles being considered.

Cramer 2016 study, Chapter 4 Conclusions and Recommendations. pgs 68-69-70. "The results of this study are intended to assist ITD in making US 20 and SH 87 safer for the traveling public. It is a step in a series of efforts that will need to be carried out to make these alternatives become realities. Humans and wildlife populations will benefit from swift and long term actions by ITD and their partners in keeping roads safe for humans and wildlife."

Thank you for considering my correspondence.

PREPARE TO OFFER A COMMUNITY SOLUTION

(map Cramer 2016 study, pg. 13)

The above map from the Cramer 2016 report recommends a total of 17 over/under pass structures. While it may suggest in summary the over/underpasses as the optimum solution at 8 main site locations, it also calculates that it would take 329 years by one metric to recover the investment costs along the 63 miles, which would also out-live (by many decades) the lifespan of the passages themselves.

These 17 structures would extremely impact Island Park and how we would all live here to a point un-recognizable. These passages and the fencing that would accompany them in order to make them successful, should be seriously considered as they are suggested in this report, and are completely not feasible in practicality or affordability. The private land that would be involved and the livability impacts for all community members would be negatively permanent.

The Island Park Safe Wildlife Passage initiative also does not embrace the entire 17 structures solution, it has chosen to support just one. That proposal involves The Targhee Pass section located on the Continental Divide nearest Yellowstone. I cannot support it, or any other one site specific solution as the best expenditure of ID DOT dollars.

Traveling the entirety of this 63 mile stretch you can honestly anticipate multiple locations that are considered ‘hotspots’ for high density wildlife crossing.

After studying both the 2014 and 2016 DOT/Cramer studies which consider the wildlife/vehicle collision issue, I would like to offer several alternative solutions for the Island Park community to think about that are also mentioned. Signs, speed reduction, noise devices, reflector technology, and solar lighting methods are given mentions. Please note that they are NOT study rated when applied in tandem. This report supports one preferred solution (over/underpasses) at many locations.

I would like to suggest using several other solutions along the entire stretch of roadway.

A 63 mile solution, with multiple components.
A solution which could request ID DOT to continue the tree cut-back for all 63 miles, gaining increased opportunity for both human and wildlife to identify and avoid one another?
A 63 mile solution that asks to strategically place appropriate warning signage (driver awareness potential) at all locations identified as high density wildlife crossing locations?
A 63 mile solution that incorporates multiple reflective and/or noise deterrents between the highest density locations.
A 63 mile solution that decreases the speed limits throughout, for all modes of vehicle traffic, civilian, truck, and bus, greatly increasing the potential to stop safely and provide greater reaction time for wildlife to avoid collision for themselves?
A 63 mile solution that can come in at a fraction of the cost of a one site-specific overpass solution, yet provides for the entire roadway, not just a chosen location that we had no voice in selecting.

I have not found a single person, through outside conversations, that does not enthusiastically support the tree cut-back on Hwy 20 which has already happened. Travel south of Targhee Pass is also the road travelled primarily by Locals so we can personally attest to the advantages. The purpose of that project was to help prevent deterioration of the roadway itself which has been successful, the road is holding up much better through the seasonal weather extremes.

Humans and wildlife traveling and crossing Hwy 20 alike have also gained the added advantage of greater wildlife/vehicle collision avoidance by being able to see one another sooner at greater distances. Perhaps this was principally an unintended consequence, but it is in fact, also offered as a wildlife collision mitigation solution.

One very important factor that neither study considers is, the future technologies that are being developed and which will become standard in future vehicle models. These technologies are impact avoidance and automatic vehicle speed reduction technologies. All future transportation roadway designs should include and consider these future technologies. A 5-year and beyond transportation design should not offer a solution, that upon completion, might already be obsolete and consequently be a waste of tax-payer investment.

The traveling Public appreciates that ID DOT looks to design wildlife/vehicle collision safety and avoidance measures when considering future project work. Eastern Idaho welcomes the opportunity for ID DOT District 6 to get some money. This is an important concern for most people traveling and making their home in beautiful wild places with wildlife living there. No one wants to cause harm or injury/death to either themselves or an animal as a result of being at the same time in the same place on the roadway.

If wildlife and human safety is truly the priority, and the entire 63 mile stretch of Hwy 20 is being considered, then ONE site specific structure is simply not an adequate solution under the mandate that ID DOT has been given. One site-specific solution does not address the reality of wildlife crossing safely for the 63 mile stretch. Historically, Locals know that animals cross at will anywhere and at other locations at much higher concentrations than at Targhee Pass.

CONNECTIVITY should not have factored so heavily into an IT DOT report. CONNECTIVITY is not ID DOT’s mandate. CONNECTIVITY is however, the goal of regional conservation NGO work. These groups were invited to weigh heavily in the 2016 study. They scored the priority locations on the roadway. Regional NGO’s should seek independent funding for any multi-million dollar over/under pass structures that they might like to see on their own, rather than be invited to advance them in a public road project, and/or further to be allowed to impact the selection of the location of ID DOT work.

It is my hope that when we return the focus to animal and vehicle safety as priority #1, that they can also support solutions that address this concern for all 63 miles as well. That can be a shared and common goal.

Island Park needs to communicate and discuss such alternatives within our community and become prepared to offer ideas at the upcoming March meeting of ID DOT.

Thank you for reading.
Members of the Targhee Pass Study Team:

I have lived on the North shore of Henry's Lake since 2006. I travel north or south on US 20 daily, and Targhee Pass at least four times weekly during all four seasons. I applaud the work ITD does to maintain the highway, particularly the section between Last Chance and the Ashton Hill. Until recently, this section was dangerous due to severely degraded road surface, as well as trees and vegetation that extended right to the edge of the road. The latter resulted in all-too-frequent wildlife-related collisions, particularly during the Spring and Fall migrations. Re-surfacing the road and removing trees and brush from the road's edge have markedly improved the safety of this section.

Targhee Pass is a natural migration route for animals traveling between the Madison Valley, the Centennial Valley, and Yellowstone National Park. They can make this migration without ever crossing US 20, unlike the animals in the Ashton area. To characterize this proposed project as a way to reduce wildlife accidents is a misrepresentation of facts. In 11 years I have seen one dead elk on this section, and it was right at the junction of 20 and 87. A project of the scope I observed during the renovation of the Ashton hill, which is the image I envision, would be extremely disruptive to the migration of wildlife for years.

I'm not sure how to respond to "increased icing". Are you saying there is more ice on this road in January than on the section that passes through Mack's Inn or Elk Creek Station? How do you measure that? As for drifting snow, the only place this issue is a potential problem is at the summit, and there is snow fence that prevents any serious drifting problems.

I have never seen a traffic jam on this road. The vast majority of commercial 18-wheeler loaded with bees that capsized on the Pass several years ago, I have never seen a traffic accident on this section of highway. I'm confused as to how a wider shoulder would enhance this safety record. The best "safety" feature of this section is its winding path. Drivers instinctively slow down, both to negotiate the turns and enjoy the scenery.

The section of US 20 between the Montana border and Highway 87 is safe for vehicles and wildlife, and any plan to embark on a major reconstruction project is unnecessary and ill-advised. I hope your group lives up to its name and truly conducts an "environmental study". I'm confident that the group will agree that the potential negative impacts of any large-scale project in this area will far outweigh any perceived benefits.

Hello, i have sent comments prior to this about wildlife vehicle collisions. I will be out of town so unable to attend. I have additional info besides my own observations of wildlife kills on hwy 20, this is 2nd hand info so i dont know how much bearing it has, anyway talking to a trucker that wishes to be nameless says he has killed 14 deer last and is tired of replacing bumpers on his semi so has now put on a cow catcher to reduce damage, my point being one trucker 14 deer, thats alot of animals and i am no expert but would say one in six vehicles are tractor trailers that travel on hwy20. I would like to see underground passages for animals safe travel, speed limit lowered to 55 during spring and fall migration and semi traffic routed to hwy15 other then for local deliveries, its not that far out of their way. And on the underground passages atvs and snowmobils could use these also for a safer crossing of hwy 20. Maybe check out Y TO Y Yellowstone to Yukon safe Passage. Thank you for doing the study.

Members of the Targhee Pass Study Team:
I have lived on the North shore of Henry's Lake since 2006. I travel north or south on US 20 daily, and Targhee Pass at least four times weekly during all four seasons. I applaud the work ITD does to maintain the highway, particularly the section between Last Chance and the Ashton Hill. Until recently, this section was dangerous due to severely degraded road surface, as well as trees and vegetation that extended right to the edge of the road. The latter resulted in all-too-frequent wildlife-related collisions, particularly during the Spring and Fall migrations. Re-surfacing the road and removing trees and brush from the road's edge have markedly improved the safety of this section.

Targhee Pass is a natural migration route for animals traveling between the Madison Valley, the Centennial Valley, and Yellowstone National Park. They can make this migration without ever crossing US 20, unlike the animals in the Ashton area. To characterize this proposed project as a way to reduce wildlife accidents is a misrepresentation of facts. In 11 years I have seen one dead elk on this section, and it was right at the junction of 20 and 87. A project of the scope I observed during the renovation of the Ashton hill, which is the image I envision, would be extremely disruptive to the migration of wildlife for years.

I'm not sure how to respond to "increased icing". Are you saying there is more ice on this road in January than on the section that passes through Mack's Inn or Elk Creek Station? How do you measure that? As for drifting snow, the only place this issue is a potential problem is at the summit, and there is snow fence that prevents any serious drifting problems.

I have never seen a traffic jam on this road. The vast majority of commercial 18-wheelers roar down Highway 87 with their "jake brakes" chattering at every decline, despite signs prohibiting such. The steady stream of RVs traversing Targhee Pass from mid-June to Labor Day motor up the pass at 50-60 miles per hour. Other than an 18-wheeler loaded with bees that capsized on the Pass several years ago, I have never seen a traffic accident on this section of highway. I'm confused as to how a wider shoulder would enhance this safety record. The best "safety" feature of this section is its winding path. Drivers instinctively slow down, both to negotiate the turns and enjoy the scenery.

The section of US 20 between the Montana border and Highway 87 is safe for vehicles and wildlife, and any plan to embark on a major reconstruction project is unnecessary and ill-advised. I hope your group lives up to its name and truly conducts an "environmental study". I'm confident that the group will agree that the potential negative impacts of any large-scale project in this area will far outweigh any perceived benefits.

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COMMENTS ON US 20 CORRIDOR PLAN

NEPA requires consideration of potential environmental, economic, and socio-cultural impacts in assessments of prior to making any decisions about whether to move forward with proposals. The iplan lacks in fully addressing all of these areas.

It is required that all affected groups and public be invited to provide input. First, often public comment periods allow citizens to remark on how to regulate federal actions but not to question or prevent such activities more generally. Public participation offers citizens the opportunity to react to plans and decisions already in the making, rather than preventing them in the first place.

Second, while heavy emphasis is placed on Native American rights and culture, the local IP citizens, who have a deep and rich heritage in Island Park, and who are indigenous to the area, are ignored. In general, federal and state agents were are primarily focused in the scientific, or technocratic aspects of IP, but severely lacked involvement from all socio-cultural segments. Why are residents with this heritage excluded, should they not have as much authority over their land as do Tribes?

Third, federal and state agents invested their time primarily towards specific groups (NGOs, foundations with initiatives, Tribes, etc.) prior to the public comment period while giving the IP “natives” limited opportunity to
provide feedback, and limiting their opportunity for the same amount of time in studying the plan that has been worked on with other OUTSIDE (people who do not even live in the area) groups.

Finally, NEPA does not prohibit agencies from making decisions that defy public concern. Final decisions around a proposed project can lawfully go against public input obtained throughout an EIS public comment period.

Although NEPA is only in the EA stage it would be helpful, and is a NEPA requirement, that full engagement with all IP residents is required, not just a few selected groups who happen to hold the same perspective, and who are not residents in the area.

Federal agencies bring in “experts” to provide their “knowledge, values, and views” of the IP area. There is no representation by those who live in the area as these “experts” have pre-determined what knowledge is relevant, thereby excluding perspectives and knowledge by IP residents.

For this first stage in the NEPA process, EA, what efforts were made by federal or state agents to gather input from IP residents? One meeting was held in IP in the dead of December when the majority of residents were not available to attend any meeting, up to 4,000. A second meeting will be held in April, again during a time when the majority of residents are not available to provide input. And out of those extra 4,000 residents, how many have been notified of the iplan? Do two separate, 2 hour meetings really provide adequate opportunity for resident input?

Should the federal agents determine that an EIS comment period should be pursued, again, how will IP residents be notified to look in the federal register for notice of intent?

What guarantee will the FHA provide that the IP residents input will be included for a potential EIS design, facts that are provided against the iplan being incorporated into the document, how information is presented, worded and explained—and if not to whom is FHA accountable?

Typically, draft EISs are prepared according to the “experts” values and knowledge at the expense of other perspectives such as from local residents who are indigenous to the area. This draft EIS becomes the primary document on which public comment periods are based. With scant efforts to gain input from IP residents I would anticipate the EA will proceed to the EIS without any of this input, and will instead include all of the perspectives from NGOs who have been allowed the opportunity to decide what should happen in the IP area.

Because the exclusion of input from IP residents and the iplan being designed with the subjective interpretations and perspectives of a few appointed experts, what guarantee do IP residents have that their input will be carefully considered and incorporated?

NEPA does not prohibit agencies from decisions that may harm the three “pillars of sustainability”, having no guidelines or regulations. There is also no mandated requirement for public comments to guide the final decision. Given this, how can responsible decisions be made on behalf of IP residents?

Therefore, I am requesting that the FHA and ITD start over, giving sufficient time for all IP residents to study the plan, do the necessary research, and formulate a response and further possible alternatives to the iplan during the EA process.

Secondly, specific standards and guidelines to effectively incorporate IP resident input into the iplan should be developed, such as heavier consideration for alternatives to this plan. IP residents should be considered an “at-risk” population as the iplan will dramatically affect their “socio-cultural” status, and possibly the IP economy, the economy being a severely neglected aspect in the iplan. An IP resident, or perhaps more, should be added to any federal committee whose task it is to move forward with any EA or EIS, giving IP residents a larger voice. This privilege is granted to outside groups and Tribes and should therefore be granted to IP residents as they are the primary group that will be affected by this plan.

As a Republic form of government, the United States is based on citizen power. The federal government may have the control, but it is the citizens whose voices have the power to give that control to the federal government, it is not the other way around. This is also stated in the Idaho Constitution. Adequate time should be given to residents to present alternatives to the iplan and studies that are contrary or do not validate what the iplan claims.

IP residents should also be provided the opportunity to create their own separate survey that will give a broader understanding of the plan to residents for their perspectives. These meetings should not be limited in amount or time, and not end until resolution to the satisfaction of IP residents is achieved.

Overall, this iplan severely lacks a review of the required socio-cultural and economic aspects of the IP area; includes only involvement from organizations that hold the same perspectives as the FHA, ITD, and IDFG; has completely disregarded any involvement by the residents who live or own homes in the area; has used old, and sometimes misleading data, while excluding data that does not support its’ objectives; and which carries a
suspicion of the beginning of future plans to completely abolish the area as it exists today in order to integrate it into a Yellowstone Park or permanently create a wilderness or biodiversity corridor with restricted access by Idahoans.

Studies:

1. The Cramer study was based on assumptions from WVC and carcasses data, “probable” migratory paths, and hot spot areas. What studies in IP have been done to actually determine what the migratory flow is for Elk? A National Geographic map was cited as a source for Elk migration. This map is used by National Geographic for K-12 studies, it is not a map from migratory studies. Nor does the Idaho Highway Wildlife Linkage source validate migration paths.

2. What study was conducted in IP to determine the migratory path of other species such as Moose and Bears, or land use of squirrels, chipmunks, skunks, porcupines, gophers, or any other animal that move in this area? Have any studies been done on non-migratory animals or those that have separated from the herd that may have been involved in a WVC?

3. What study was done in IP that evaluates the restrictions that will occur for other species with fencing?

4. Studies have shown that with these types of corridors there is an increased incidence of invasive species. What studies have been conducted in IP that will show potential increases in invasive species along Hwy 20 as a corridor?

5. Studies have shown that corridors increase the presence of predators. What studies have been conducted on this in IP, using the wolf as an example, that will predict an increase in predatory activity towards animals using this assumed migratory path?

6. What was the source of funding for the Cramer study and Safety Solutions report?

7. According to the CEQ, the purpose of an EA is to determine the significance of the environmental effects and look at alternative means to achieve the FHA and ITD objectives. As such, the EA should provide sufficient evidence and analysis for determining whether to prepare an EIS. What efforts have been taken or undertaken to ensure that ALL evidence is provided for an adequate analysis, such as studies that show corridors are not effective, can promote invasive species and predatory activity, and that wildlife do not always use these paths?

8. What studies have been reviewed on connectivity? Studies have shown that fragmented species populations flourish without connectivity via corridors.

9. Has a study been conducted, or any studies reviewed, on the genetic diversity of Elk in the IP area, and whether or not the diversity was increased or decreased?

10. How many studies were reviewed on the actual effectiveness of corridors?

11. Has IP been studied as a target or umbrella area?

12. Were all types of species movement, such as migration, round trip, and home range studied in the IP area?

13. What empirical studies were either conducted or reviewed in IP that supports corridors would be effective?

14. What studies were either conducted or reviewed in IP regarding gene flow in corridors?

15. What would the cost be to conduct these studies in IP?

16. The Safety Solutions on WVC report recommends reconstruction of bridges in certain areas to “increase the probability that large wild animals would use them” and “removing vegetation”. Without any studies on the actual numbers of wildlife, type, or the definitive migratory path, ITD and IDFG are “guessing” on the effectiveness of these bridges in addition to destroying the landscape.

17. In the Safety Solutions report it also states, “solutions for WVC that maintain wildlife connectivity are not typically cost effective based solely on WVC crash and carcass data”. Also stated, “intact wildlife herds and improved water flow are also not accounted for.” If this is the case, a more comprehensive study should be conducted which gives a more accurate assessment. How is it justified to proceed with possible construction of these structures when the report itself states the data is inadequate?

18. The “scorecard” used input from the Henry’s Fork Legacy Project members. The majority of these individuals do not even live in the IP area yet their involvement and opinions are given more weight than the residents who do live there. The report also recognizes that IP residents were not included in the decisions stating, “with the partnering of federal and state agencies and non-profit organizations”. The weight of involvement and perspectives are NEPA required and should include ALL IP residents which has not been done.

19. From 2010-2014, 94 WVC were reported at one location, with 88 carcasses counted. What is the actual numbers of each species per year and what percentage of those numbers was actually affected? Did the population decrease each year as a result of WVC or remain stable?
20. What prior studies in IP were used to identify priority locations for the range of solutions to reduce WVC?
21. Field trips with interested agencies and non-profit “partners” do not constitute full public involvement in
decisions. What will be done to correct this error? Consulting with “conservation oriented professionals in the
region” again reinforces the selective biases of ITD and IDFG rather than working with all perspectives of those
who live in the area which seriously violates the NEPA process.
22. One of the resources used was Geodata Services from 2005, 12-year-old data. More current data should be
obtained before this plan moves forward.
23. A select group, HFLP, was allowed the opportunity to prioritize the segments with SurveyMonkey. The
assumption here is that they distributed the survey to those whose perspective are in line with the HFLP and who
may not even live in the IP area. A separate survey should be conducted with all IP residents which provides a
more comprehensive perspective from those who actually live in the area.
24. Restricted wildlife movement, restricted recreational use, reduction of scenic value, cost, efforts to “convince”
an elk to move through a structure, private land, hunter access, restricting access by “skittish” animals, restricted
off road vehicle access, tree, vegetation, and shrub removal, poor carcass data collection, and limited bridge
access are found to be common “cons” to building these structures, and in the report itself it states, “Overall,
solutions for WVC that maintain wildlife connectivity are not always cost effective initially based on WVC crash and
carcass data.” Should these not be huge red flags that FHA, ITD, and IDFG are premature going to this length for
building any structure in IP, that studies on these various issues should be conducted in the IP area, and that the
current iplan should not move forward?
25. Out of the listed studies in the Safety Solutions report there were none that reported on the negative aspects of
corridors. For an unbiased perspective, these types of reports should be included. Studies from other states
were included but generalizing this data to IP does not provide an accurate picture of IP. Nor were there any
current studies on the numbers of different species or actual migration patterns of different species in the IP area.
26. Natural Resource Data Sources included “human settlements”. IP park is made up of residential areas with
specific names, whose population varies with seasonal changes. They are not, and should not be considered
“human settlements”. Human density was also mentioned in the Safety Solutions report. This is misleading as it
implies a dense population in a specific area, which again, fluctuates seasonally. This is one socio-cultural area
that is lacking in the reports. Citing Macks Inn as “dominated by humans”, the report fails to identify what time of
year this assumption was made, what the term dominated means, and in what context this is used relative to
WVC.
27. Much of the migration data is 10 plus years old. This data should not be used. Same with “probable collared
Elk crossings” and “probable collared moose crossings”. What percentage of the herd was collared and how can
this data be used to substantiate migration patterns for either species? Why was non-migratory data included
with migratory? Were studies reviewed from 10-20 years ago that reflect any changes either in the migratory
paths, numbers of species, or WVC, or whether or not there has been either a reduction or increase in WVC?
28. The same report states, “Elk are among the most difficult ungulates to accommodate with wildlife crossing
structures.”, and are used primarily by only a single or a less than 4 herd. Yet FHA, ITD, and IDFG have gone to this
length in potentially building these structures. Does this small amount of Elk crossings justify reshaping the IP
landscape?
29. What studies in IP were conducted to determine that “warning signs have not been shown to reduce WVC”?
30. In the Safety Solutions report, why was the term “state park” area referenced? IP is not a state park, is there a
future plan that it will become one or integrated into YP?
31. What study was conducted that validates the statement, “high probability of elk” in an area? What is the
clarification on “high probability” as far as time of year? What is considered “high probability”, one Elk or more?
32. The Geodata Services, Inc study from 2005 was referenced designation “for movement of elk, moose, black
bears, land carnivores, including wolverine” at the SH 87 junction. This data is 12 years old and unacceptable.
33. Spending millions of dollars to justify a reduction of 4 WVC per year is not justified.
34. The Safety Solutions study recommended further analysis given the inadequate data methodology. Does the
FHA or ITD intend to conduct studies in any of these areas?
35. The iplan injury crash data does not match the Cramer study data.
Social Impact:
1. The current aesthetics and environment of IP will be altered with fences, structural changes, land destruction
for bridges (over & under), and fencing. This is a significant social impact on the area.
2. How many private properties does the iplan expect to alter?

3. What process will be used to utilize private property such as eminent domain, engaging the landowner in conservation easements, or other methods?

4. How many private land owners in the affected area have been contacted and involved in the iplan up to this point and by which state or federal agency?

5. The iplan will have significant negative impacts on the cultural heritage in IP. What alternatives have been considered regarding this aspect?

6. As it stands now there will be a significant impact on the quality of life for IP residents. Land rights and freedom to use land will be permanently altered. What consideration has been given to this aspect and any proposed alternative, if any?

7. What efforts will the FHA and ITD take to start over with this iplan with specific involvement by IP residents?

8. IP has been a very targeted area for change due to its close proximity to WY and Jackson. Please provide the analysis or studies that were done on the potential impacts this would have in IP towards other initiatives such as connectivity, wilderness area or national monument designation, or integration into national parks.

9. What considerations or studies were conducted to determine what the effect would be on the historic use of the IP area, which has always been recreational access and enjoyment of the landscape?

10. Were any considerations given, or studies done, on the IP culture in terms of those whose heritage goes back generations, who have a deep bonding with the land and its use, and the impact this will have on their culture?

11. Was consideration given to the fact that IP is a very social community and how this plan potentially disrupts that social network, especially by those who do not live there and yet appear to have been provided more input into altering the landscape to their plans rather than those who actually live there? This a major and very concerning change in the social structure of IP.

12. Why was land ownership and recreation valued so low? This plan would have tremendous impacts on private land ownership and recreation which IP is known for.

13. In IP there has always been various species who have moved through the area, crossing private land. This has never been a problem. Why does the FHA and ITD now consider this is something that has to be changed?

Interested Parties:

1. Has a list of agencies, NGOs, and any persons who were consulted prior to the EA been provided? If not, where can that list be obtained?

2. Will the FHA and ITD proceed to an EIS without increased involvement by IP residents?

3. What action can be taken if IP residents are not provided the rightful opportunity to full participation and involvement in the current direction of the iplan?

4. What efforts will be taken by the FHA and ITD to ensure that proper notification is given to all IP residents on future plans, given that so many live out of the area during the winter?

5. How many meetings will be scheduled in the IP area for full input by IP residents during a time when they are actually in residence in IP?

6. If the NEPA process reaches the scoping phase what assurances do IP residents have they will be identified as interested parties, be allowed the opportunity to identify significant issues that need analysis and have their perspectives included, be considered as having a lead role in all decisions, be allowed to identify all gaps in data and information, and set any time limits for a full analysis?

7. What methods of communication, such as video conferencing, conference calls, formal hearings, or informal workshops will the FHA and ITD provide for full input by IP residents?

Outside agency involvement:

1. What specifically is the future plan by the FHA and ITD to proceed with connectivity plans (whether ecological or wildlife); integration into Yellowstone Park; designation as a wilderness area, heritage area, or national monument; regionalization plan; or any other plan that will permanently alter the current IP boundaries?

2. How will the IDFG SWAP plan be used to further advance the development of corridors and connectivity?

3. What coordinated efforts have occurred with the GNLCC to create corridors that will eventually lead to connectivity of large landscapes that cover Idaho, Montana, and Wyoming?
4. Is the FHA, ITD, and IDFG working towards connectivity by starting with the iplan?
5. How much involvement or coordination has the FHA and ITD had with the Heart of the Rockies, Yellowstone 2 Yukon, Greater Yellowstone, Crown of the Continent and other initiatives in creating the iplan?
6. How much involvement has the FHA and ITD had with other outside NGOs such as the Nature Conservancy or Wilderness Society? How much weight has been given to these groups to advance their plan in creating corridors and connectivity?
7. What are all the federal agencies that have been involved in the iplan up to the EA and how much further involvement will there be with them?

Economy:
1. What is the anticipated cost of building fences, over and under passes over a period of 10 years? It appears to be millions.
2. Where does the FWA and ITD plan to obtain the financing for the iplan? Will it be distributed from taxpayers throughout the state, federal funds, or from private organizations and NGOs?
3. Where will the financing come from for the maintenance of the structures being proposed in the iplan?
4. What studies have been conducted to determine the economic impact on IP if much of the land is converted to conservation easements, corridors, state owned, or other conservation measures? The IP economy depends on tourism and if the land is lost to these plans the IP economy will suffer. This required aspect of NEPA was completely missing in the iplan.

Alternatives:
1. How many alternatives have been proposed, considered and eliminated in the iplan?
2. As an alternative, should drivers be held more accountable for not driving responsibly through an area where there is seasonal migration? More signage giving warnings and/or with flashing reminders, reduction of speeds, and heavier fines should all be given consideration.

Ecological Impact:
1. What studies has the FHA or ITD conducted to evaluate the ecological effects of the iplan in terms of altering the landscape for bridges and fences?
2. Has consideration been given or studies conducted on other species and the impact these barriers will have on them?
3. Are there any studies currently underway for using the iplan to further expand or otherwise alter the biodiversity in the IP area?
4. Have there been studies to determine if the current Elk metapopulation recolonization matches the extinction rate?
5. What historical data has been reviewed to determine the actual effect of VWC on the Elk population, or if there has been any actual effect?
6. It does not appear that the Elk’s habitat and ecology of movement taken into consideration. Will any studies be conducted on this?
7. With the WVC data, were there any studies done to determine if the carcass was from a migratory herd or an isolated separation from the herd?
8. How far does the FHA, ITD, and IDFG intend to take this type of plan? Will it eventually expand to include all species, plant or animal, that will lead to the exclusion of all use by Idahoans or ban all Idahoans from the ability to live in the IP area?

**EA Process:**

1. How will the FHA and ITD advise IP residents they have objectively evaluated all reasonable alternatives provided by IP residents and reasons for the elimination of those alternatives should that occur?

2. New legislation might be an opportunity to redefine the future of IP without the influence of outside groups. Is the FHA and ITD willing to not proceed with this plan until such time legislation can be introduced for the benefit of IP?

3. What is the administrative appeals process for FHA?

108 I see that the comment proud has closed in this project, but I was just recently forwarded the information. I live in Pocatello and travel several times a year to Island Park and Yellowstone via Hwy 20. I know that traffic can be heavy and wouldn't want to impede the flow. However, my family and I are concerned for the migrating wildlife for our safety and theirs. We rarely travel back and forth in the dark specifically to avoid a wildlife collision.

If it’s not too late, please pass on my concern for this project to protect wildlife and motorists. I think a (or several) wildlife underpass/overpass is a great idea where feasible. I also think that a lower night time speed could avoid some collisions. The best parts of Island Park and Yellowstone are the wild scenery and the wildlife. We should do what we can to decrease our impact.

109 Members of the Hwy 20 subcommittee of the Henry’s Fork Legacy Project (cc’d above) met yesterday. In preparation for the meeting this Thursday, and given the community commentary in Island Park, the Henry’s Fork Legacy Project recommends that you and/or ITD could clarify a few points on the Targhee Pass Project/Hwy 20 Safety Corridor process at the beginning of the Thursday meeting. Specifically, could you speak to and answer the following questions:

1. **Process:** can you clearly lay out the process, actions, analysis and timeline for the a) Targhee Pass Project, and 2) Hwy 20 Safety Corridor Planning? Explain the differences between these projects as the public has heard about both efforts.

2. **Public comment:** can you clarify how the public comments are being shared and incorporated among the contractors and agency throughout both processes. E.g. who receives the comments? Then what happens to it? What is the process for addressing public comments? How will the public know if their comment was received and how was the comment used?

3. **Team:** who is on the Interdisciplinary Team for the projects? What agencies are part of which processes? How are Idaho Fish and Game, Caribou-Targhee National Forest, Fremont County, Island Park, Henry’s Fork Legacy Project, private land owners, etc. being included or incorporated? What other ways are you getting public comment?

4. **Alternatives:** besides a no-action and the description of improvements in the ITIP, what other alternatives are being considered for Targhee Pass? Will other alternatives be considered?

5. **Partnerships:** 1) Funding - have other partnerships in funding been explored? Is there opportunity now in the process to explore partnership funds? How would ITD propose to fund mitigation for wildlife? 2) Mitigation: is ITD actively engaging in partnerships outside of the ROW to mitigate for wildlife impacts or promote connectivity and healthy wildlife populations?
Dear Targhee Pass Study Team,

Idaho Department of Fish and Game (IDFG) staff attended a meeting hosted by the Idaho Transportation Department (ITD) on December 15th, 2016 to discuss the planned Targhee Pass expansion project on US 20 in Island Park. During this meeting the ITD described the Environmental Assessment (EA) that will be conducted to identify project alternatives and disclose impacts of various alternatives. The ITD also presented a draft Purpose and Need statement of the EA and requested that state, local and federal agencies present at the meeting provide input on this draft document.

The attached document incorporates suggestions from IDFG (in red text) focused on better consideration of wildlife conservation concerns into the Purpose and Need section of the EA. IDFG believes that including wildlife conservation concerns throughout the process is crucial to developing alternatives that enhance human safety and maintain daily and seasonal wildlife movements vital to the region’s economy and natural heritage.

Thank you for the opportunity to provide this input. We look forward to working with the ITD through the EA process to develop the best alternatives for the travelling public and wildlife in Island Park. Please contact me or Rob Cavallaro if you have questions or require additional information.

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Idaho Department of Transportation

U.S. 20 from State Highway 87 to the Montana State Line (Targhee Pass Environmental Study)

Purpose and Need and Resource Issues Summary

The Idaho Transportation Department (ITD) is proposing transportation improvements for U.S. 20 from State Highway 87 to the Montana State Line (Targhee Pass). Alternatives for meeting the purpose and need of this proposed project will be evaluated in an Environmental Assessment (EA).

Project Background

ITD’s corridor plan for U.S. 20, completed in 2006, identified transportation improvement needs from Ashton to the Montana State Line.1 Public involvement was an important component of the corridor planning process, identifying local needs and concerns for the corridor. Additional studies to supplement the corridor plan that also included public involvement were completed in 2016.

As described in the corridor plan, U.S. 20 must accommodate local traffic, heavy tourist traffic, and the majority of the freight movement between West Yellowstone, southern Montana, and the communities of the Snake River Plain. When the corridor plan was first being developed, much of the roadway within Idaho was falling behind in serving its function as a component of the National Highway System (NHS). U.S. 20 within Idaho remained a two-lane rural highway with four to six foot wide shoulders along the majority of its length. Since that time, improvements have been made for many of the segments of the corridor, with Targhee Pass being one of the remaining sections to receive attention. At the present time, pavement condition in this segment of the corridor is beyond routine repair and requires reconstruction as well as consideration of upgrades to meet current design safety standards.

ITD’s mission: Your Safety. Your Mobility. Your Economic Opportunity., overlaps significantly with wildlife conservation and management goals on US 20 through Island Park (Idaho Department of Fish and Game {IDFG} 2017). Wildlife in this landscape is a principal factor affecting road safety and mobility (Cramer 2016) and constitutes a major economic driver for Fremont County and the region (Loomis 2005; IDFG 2008). Island Park also plays a key ecological role in supporting the life cycle of iconic wildlife species associated with the Yellowstone area such as migratory elk, grizzly bears, wolverine and trumpeter swan.

A particular safety, economic and ecological concern for the region is maintaining the viability of big game (deer, elk, moose) migrations from Yellowstone National Park and other high elevation public lands to lower elevation lands in Idaho. Highway planning and project designs that maintain or improve permeability for wildlife will improve human safety, enhance mobility and preserve vital elements of Fremont County’s economy and the natural heritage of the region. Our ability to maintain daily and
seasonal big game movements across Highway 20 through the future will also be a valuable measure of relative highway safety and landscape-scale habitat connectivity.

In October 2016, the ITD board approved use of federal funds for making improvements to this segment of the corridor. Due to use of federal funding, the presence of federal lands in the project area, and potential impacts to threatened species listed under the federal Endangered Species Act (ESA) the Federal Highway Administration will complete an Environmental Assessment (EA) in accordance with requirements of the National Environmental Policy Act (NEPA) and the policies and procedures of the ITD.

Needs for the Proposed Project

Needs supporting improvement to this portion of the U.S. 20 corridor are:

- This road segment is a potential bottleneck for large-scale migratory elk movements from Yellowstone and other high elevation habitats to seasonal ranges in Idaho and Montana.

- This area has very high wildlife habitat connectivity values for moose, grizzly bear and wolverine (Cramer 2016; IDFG 2014; Interagency Grizzly Bear Study Team 2013). A federally designated grizzly bear was killed in a wildlife vehicle collision in this area and several other documented grizzly bear crossing are documented (IGBST 2013).

- Connectivity between Yellowstone Ecosystem and Idaho/Montana habitats is threatened with increased, unmitigated traffic.

- Pavement surface and other physical elements of the roadway have exceeded their expected life cycle; deteriorations are beyond routine repair

- Features such as shoulder widths do not meet current design safety standards

- In winter, specific areas are identified as having safety issues with blowing/drifting snow or excessive icing

- Increased traffic volumes and projected future volumes cause congestion and safety problems

Pavement Condition

The roadway, in service for 57 years, is beyond the expected life cycle of 40 years. Ballast materials are aged; surface and subsurface drainage is failing, evidenced by frost heave and pavement cracking. Routine preventative pavement treatments to maintain ride and pavement integrity fail early due to the worn out foundation section. To maintain the roadway surface in a cost effective manner the roadway ballast and surface require replacement.

Design Safety Standards
In this road segment there were 17 reported wildlife-vehicle collisions from 2010 to 2014 (average of 3.4 wildlife-vehicle collisions per year) (Cramer 2016).

This segment of U.S. 20 does not meet current design safety standards. Some past improvements such as turning or passing lanes, have been accommodated through pavement restriping, resulting in narrower shoulders than what is required to meet design safety standards.

Winter Driving Conditions

Winter safety issues include areas where blowing and drifting snow are concentrated, and areas where there is excessive road icing due to shading by the forest canopy.

Congestion

U.S. 20 through eastern Idaho is an important regional rural transportation corridor that is intended to move traffic freely and efficiently at consistent and safe speeds. Traffic flow is hindered in this 4-mile portion of the corridor during the busy summer months. High traffic volumes during the summer months are projected to increase through the design year.

Other related factors evident in the traffic study are increases in left-turn movements at some specific intersections and increases in slower moving vehicles (trucks, recreational vehicles), specifically in the east-bound (uphill) direction. Collectively, these conditions increase travel times, exacerbate driver frustration, and reduce travel efficiency, all of which decreases safety as evidenced in crash records.

Proximity to Yellowstone National Park is a significant reason for congestion during the tourist season. Tourists from around the world first experience the park on the drive to Yellowstone. For local residents, their traveling experience is also impacted by this congestion. Congestion contributes to the challenges experienced by the diverse motorists that drive this section of U.S. 20.

Throughout the year, freight movement is an important service provided by the corridor. While essential to communities near and far, truck traffic adds to the congestion and safety issues for the corridor.

Highway improvements that reduce congestion and improve traffic flow, but do not mitigate the danger of wildlife-vehicle collisions may actually reduce highway safety; or lessen the degree of safety improvements achieved.

Purpose of the Proposed Project

The purpose of the proposed project is life cycle restoration of U.S. 20 between mileposts 402.5 and 406.3, restoring foundation structural integrity, pavement condition, and drainage, while mitigating the potential for wildlife-vehicle collisions and preserving crucial ecological values of the area, particularly daily and seasonal wildlife movements. Improvements to meet current safety standards and to improve traffic flow will also be considered.
ITD’s goal is to provide transportation and safety improvements for this segment of the corridor that will be a benefit to the community and region while avoiding, minimizing, and mitigating adverse effects to valued resources, including wildlife, cultural resources, recreation, and the visual and aesthetic qualities of this unique area.

In the Environmental Assessment, a range of alternatives for achieving the purpose of the proposed project while minimizing environmental and social impacts will be developed and evaluated. The No-Action Alternative will also be evaluated.

Resource Issues and Concerns

The following resource issues have been identified and require impact analysis in the Environmental Assessment. Resource issues will also be considered in design of alternatives in efforts to avoid and reduce impacts.

Wildlife and Fish Resources and Habitats

Targhee Pass is an important wildlife movement corridor in the region, and portions of the roadway occur within a right-of-way easement from the Caribou-Targhee National Forest. The impact analysis will identify opportunities that enhance safe wildlife passage across the roadway and identify measures for mitigating impacts to Federally-listed species as well as Forest Service special status and management indicator species.

Wildlife-vehicle collisions are also a safety concern, not just in this segment but throughout the U.S. 20 corridor as well as on other connected highways in the greater Yellowstone region. Studies of wildlife movement have been completed by the ITD and cooperators, Idaho Department of Fish & Game, and the Montana Department of Transportation. Local interest groups are actively involved in helping to find solutions to reduce wildlife mortality from vehicle collisions.

Community Impacts including Recreation and Noise

The corridor is an important transportation resource for the communities of Island Park, Idaho, Fremont County Idaho, and West Yellowstone, Montana. The highway provides connection between the communities and is used by locals to commute and for movement of goods and services. Tourists who visit these communities access local services (restaurants, lodging, destinations) by using the corridor. Snowmobile and ATV trails cross the corridor in several locations. The highway is also a wildfire evacuation route for the community of West Yellowstone and Yellowstone National Park.

There are existing and planned residential properties adjacent to the corridor. Because one or more alternatives would increase roadway capacity (by adding a lane), a noise study must be completed.

Change in Access or Access Control

The ITD does not propose any changes to access in this part of the corridor, however, traffic flow may be improved by addition of turning lanes in several locations. Access into and out of developments,
intersections, pull outs, and trails will need to be evaluated and included in design options for alternatives.

Cultural Resources and Native American Consultations

A field investigation of the corridor by a cultural resources consultant identified potential archaeological resources adjacent to the highway within the Area of Potential Effects. Efforts to avoid, minimize, and mitigate potential effects will need to be made in consultation with the Idaho State Historic Preservation Officer.

The Nez Perce Tribe and the Shoshone Bannock Tribe have expressed interest in the study and want to be consulted through the NEPA process. Targhee Pass is a segment of the Nez Perce (Nee-Me-Poo) National Historic Trail.

Visual Impacts

Potential visual changes to the corridor, particularly within the Caribou-Targhee National Forest boundary, will be evaluated and efforts will be made to minimize visual impacts of alternatives.

Known/Suspected Hazardous Materials Risks

A database review and site inspection will be completed to search for any evidence of spills or leaks of hazardous substances that could be encountered during construction.

Wetlands

There are wetlands adjacent to the roadway associated with the Howard Creek drainage. A wetland delineation report has been submitted to the U.S. Corps of Engineers for verification and Preliminary Jurisdictional Determination. Wetland avoidance will be addressed in the development of project alternatives.
March 30, 2017

Mr. Jason Giard
Federal Highway Administration, Idaho Division
3050 Lakeharbor Lane, Suite 126
Boise, Idaho 83703

Ms. Karen Hiatt, Assistant District Engineer
Idaho Transportation Department, District 6
206 North Yellowstone Highway
Rigby, Idaho 83442

Dear Mr. Giard and Ms. Hiatt:

The U.S. Environmental Protection Agency appreciates receiving the January 24 Working Draft Purpose and Need and Resource Issues Summary for the U.S. Highway 20 from State Highway 87 to the Montana State Line Targhee Pass Environmental Study, which is to be evaluated in a National Environmental Policy Act Environmental Assessment. We have reviewed these materials and have spoken with Bill Shaw, project co-manager, regarding the proposed project and how it fits into the larger corridor plan for U.S. 20. In accord with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, we’d like to take this opportunity to offer comments for your consideration as you develop the EA.

The Targhee Pass project, which is a 4-mile segment of the larger U.S. 20 Corridor Plan Ashton to the Montana State Line, is “Idaho’s gateway to Yellowstone National Park”.\(^1\) The U.S. 20 Corridor and the Targhee Pass portion of the Corridor have been the subject of what we would uphold as being a truly “EcoLogical”\(^2\) planning process. The Corridor Plan and the current proposed action have evolved within a highly collaborative partnership involving Idaho Transportation Department, Idaho Fish and Game Department, the U.S. Forest Service, the Henry’s Fork Legacy Project,\(^3\) and an actively engaged public. Additionally, ITD and IDFG have signed a Memorandum of Understanding to “collaborate for the common purpose of maintaining and improving Idaho’s transportation systems while simultaneously protecting and managing Idaho’s fish and wildlife resources and their associated habitats” for the economic, social, cultural, and recreational benefit of Idaho’s citizens and visitors.

The project Purpose and Need, which reflect the interests outlined in the MOU, are to restore the road foundation, pavement, and drainage, and to improve safety and traffic flow, while avoiding, minimizing, and mitigating any project related adverse effects to wildlife, cultural resources, recreation, and visual/aesthetic values. The EPA supports this project purpose and need and we fully agree that

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\(^1\) U.S. 20 Corridor Plan Ashton to Montana State Line, Idaho Transportation Department, District 6, May 2006.
\(^2\) EcoLogical: An Ecosystem Approach to Developing Infrastructure Projects, April 2006, is a multi-agency developed guide to making infrastructure more sensitive to wildlife and ecosystems through greater interagency cooperative conservation.
\(^3\) Henry’s Fork Legacy Project is a collaboration of local organizations and agencies dedicated to conserving the rural landscapes and unique natural resources of the Upper Henry’s Fork.
preventing wildlife-vehicular collisions and restoring ecological connectivity should be a high priority for this important wildlife movement corridor.⁴ We commend ITD and IDFG for all their efforts to collaboratively achieve transportation and ecological goals, and encourage all involved parties to remain committed to these goals. Even though myriad difficulties and funding obstacles present themselves, we can say with confidence that strong working partnerships can overcome the obstacles in many instances. We offer information and references for successful projects with similar purpose and needs in the enclosed scoping comments,⁵ and we look forward to participating as project development continues.

EPA would be pleased to answer questions, provide referrals, and support your efforts in other ways. I can be reached by phone at 206-553-2966 or by email at somers.elaine@epa.gov. Thank you for the opportunity to submit comments, and for involving EPA in this important project.

Sincerely,

[Signature]

Elaine L. Somers
Environmental Review and Sediment Management Unit

Enclosures:
US 20 Targhee Pass Project detailed scoping comments
Enclosure 2: Regional Project Examples

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⁴ Wildlife-vehicle collisions are a safety concern in this segment and throughout the US 20 corridor and on other connected highways in the greater Yellowstone region. ESA-listed species and Forest Service special status and management indicator species are among those needing protection.

⁵ See detailed comments on Ecological Connectivity, and Enclosure 2.
Aquatic resources
The NEPA document should address impacts to aquatic resources, including water quality and quantity for surface water and groundwater, hydrology, wetlands, floodplains, riparian areas, public drinking water supplies and drinking water source areas, and aquatic habitats and species. Project construction, operation, and maintenance can impact waterways, wetlands, and riparian areas from riparian/floodplain encroachment, runoff, disruption of drainage patterns/hydrology, stockpiling of materials in staging areas, maintenance of construction and maintenance equipment, and road construction and maintenance. Project proponents should plan, design, construct, and maintain the project in ways that avoid or minimize long-term water quality and aquatic resource impacts. For impacts that cannot be avoided through siting and design, the NEPA document should include mitigation measures and describe the types, location, and estimated effectiveness of the best management practices (BMPs) proposed to be applied to the project, in order to minimize and mitigate the impacts to aquatic resources.

The NEPA document should describe the aquatic habitats within the project action area (e.g., habitat type, plant and animal species, functional values, and integrity) and the environmental consequences of the proposed alternatives on these resources. The impacts to aquatic resources should be evaluated in terms of the areal (acreage) or linear extent to be impacted and by the impacts to aquatic resource functions.

The proposed activities may require a Clean Water Act (CWA) Section 404 permit from the U.S. Army Corps of Engineers. For wetlands and other special aquatic sites, the Section 404(b)(1) guidelines establish a presumption that upland alternatives are available for non-water dependent activities. The 404(b)(1) guidelines require that impacts to aquatic resources be (1) avoided, (2) minimized, and (3) mitigated, in this sequence. The NEPA document should discuss in detail how the project planning efforts (and alternative selection) conform to Section 404(b)(1) guidelines sequencing and criteria. The project proponent must show that impacts to wetlands and other special aquatic sites would be avoided to the maximum extent practicable. The NEPA document should discuss the alternatives that would avoid wetlands and aquatic resource impacts from fill placement, water impoundment, construction, and other activities before proceeding to minimization/mitigation measures.

Mitigation. The NEPA document should provide a substantive discussion of the conceptual mitigation plans for unavoidable impacts. Whether mitigation would potentially involve the use of an in-lieu-fee program or another approach, it is important to take a close look at the aquatic landscape and individual sites, in order to ensure that aquatic habitats and functions that are locally important to meeting species needs would not be depleted. The document needs to also discuss the location, wetland type(s) and functions that would be provided under the mitigation plans, and address whether and how the mitigation would adequately support area-wide hydrology, habitats, and species.

River, stream, riparian, and floodplain encroachment. Project planning and design should avoid/minimize encroachment upon, or disturbance to, natural stream hydrology, stream migration zones, stream banks and channels, riparian areas, wetlands, and floodplains. It is important to maintain and preserve natural stream characteristics and hydrology, and restore and preserve the natural and beneficial effects of riparian areas and floodplains.
stream channel modifications should be avoided. If channel impacts are unavoidable, channel changes should be planned and designed to simulate natural stream channel (and migration zone) dimensions and length and incorporate natural aquatic habitat features as much as possible. Aquatic biologists, and staff with training and knowledge of fluvial geomorphology, should be consulted during the design of stream channel modifications, and the appropriate permits and authorizations must be obtained.

**Water quality. CWA 303(d) listed waters and Total Maximum Daily Loads.** Water quality may be adversely affected if construction, including roads, and long term operation and maintenance alter hydrology and/or disturb soils, particularly highly erodible soils and steep slopes, in the project area. This could range from effects to springs, streams, wetlands, or other water bodies, to alterations in surface water runoff, infiltration, aquifer recharge, stream base flows, delivery of water, wood, sediment or other pollutants to water bodies.

The NEPA document should identify all water bodies likely to be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters. The document should also include the appropriate BMPs that would be used to minimize water quality impacts. For construction activities that would disturb more than one acre (see 40 CFR 122.26 (b)), authorization of construction related wastewater discharge is required under the National Pollutant Discharge Elimination System Construction General Permit.

If there are CWA 303(d) listed water bodies (i.e., impaired waters) in the project area, the NEPA document should disclose information regarding the water quality impairments, whether there is an EPA-approved Total Maximum Daily Load (TMDL) watershed restoration plan in place to address the impairments, and any targets for water quality improvement included in the TMDL. The proposed project should not further degrade any impaired waters, and should be consistent with TMDL plans and targets, in order to restore impaired waters such that they meet water quality standards. If additional pollutant loading is predicted to occur to impaired streams as a result of the proposed project, the project should include measures to control the existing sources of pollution in order to help offset the additional pollutants, such as from road construction, so that no deterioration of water quality occurs. States also have provisions in their water quality standards regulations that prohibit the degradation of water quality in water bodies where the water quality standards are presently being met. (40 CFR 3XX.11/12)

**Source Water Protection Areas for Drinking Water**

Public drinking water supplies and/or their source areas often exist on lands under federal management. Activities such as timber harvesting, road building, pest control, grazing, and recreation, may adversely affect waters that serve as sources of drinking water for communities. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies managing lands that serve as drinking water sources to protect these source water areas. Source Water is untreated water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source Water Protection Areas are delineated and mapped by the states for each federally-regulated public water system.

State agencies have been delegated responsibility to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. Typical databases may contain GIS and Access information of the watersheds and aquifer recharge areas, the most sensitive zones within those areas, and the numbers and types of potential contaminant sources identified for each system.

EPA recommends that the NEPA document:
- Identify all Source Water Protection Areas within or downstream of the project area (source surface waters, springs, groundwater wells and aquifers);
- Identify all activities that could potentially affect source water areas;
- Identify all potential contaminants that may result from the proposed project; and,
- Identify all measures that would be taken to protect the Source Water Protection Areas.

**Air quality, mobile source air toxics**

Emissions from project construction, maintenance, and multi-modal operations, which include motorized passenger traffic, trucks, buses, and freight are of concern with respect to criteria air pollutants and air toxics, including diesel exhaust and particulates. The direct, indirect, and cumulative impacts of project-related air emissions should be analyzed, disclosed, and mitigated. Near-roadway effects and emissions hotspots for criteria and toxic air pollutants should also be analyzed and sensitive receptor locations and populations identified. Examples of sensitive receptor locations include schools, hospitals and other medical care facilities, outdoor playfields and parks, day cares, senior centers, and other social and health services facilities.

The EPA’s Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM 2.5 and PM 10 Nonattainment and Maintenance Areas, found at [http://www.epa.gov/otaq/stateresources/transconf/policy/420b13053-sec.pdf](http://www.epa.gov/otaq/stateresources/transconf/policy/420b13053-sec.pdf) could be used to conduct an analysis of diesel particulate matter and air toxics emissions from the project proposal.

To mitigate these emissions from project construction, we recommend strengthening efforts to address air toxics and diesel emissions by:
- Visiting the Clean Construction USA website at [http://www.epa.gov/cleandiesel/sector-programs/construct-overview.htm](http://www.epa.gov/cleandiesel/sector-programs/construct-overview.htm) for many examples of construction mitigation measures, case studies, and examples of institutional arrangements for implementing this mitigation;
- Committing to a suite of air quality construction mitigation measures to avoid and minimize construction-related emissions to the extent possible; and,
- Including a commitment in the NEPA document to require, or provide contractor incentives to adopt, air quality construction mitigation measures in order to minimize the construction-related emissions of air toxics and diesel particulates.

**Ecological connectivity**

We commend the Federal Highway Administration (FHWA), Idaho Transportation Department (ITD), and the Idaho Department of Fish and Game (IDFG) for addressing the need to prevent wildlife-vehicle collisions. As stated in the Draft Purpose and Need and Resource Issues Summary,6 studies of wildlife movement have already been completed by the ITD and cooperators, IDFG, and the Montana Department of Transportation. Local interest groups are actively involved in helping to find solutions to reduce wildlife mortality from vehicle collisions. Providing safe passage for wildlife (e.g., through constructing wildlife crossings) would provide safety benefits for both humans and wildlife. This is particularly true when the proposed modifications to U.S. 20 would facilitate increased vehicular volumes and speeds, which increase the risk of accidents.7

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We recommend that the suitable number, design, and placement of wildlife crossing structures be incorporated into the project design for the Targhee Pass project, and for other segments of the U.S. 20 corridor as they are constructed. This would mitigate the effects of wildlife habitat fragmentation posed by current and potential future roadway placement and design. Currently, U.S. 20 may be nearly a complete barrier for low mobility species and a substantial partial barrier for high mobility species, with associated negative effects on survival, reproduction, genetic exchange, and long-term population viability.

Ecological connectivity is a broader concept, however, than wildlife movement in the landscape. It includes the connections and interactions between land and water, the transfer of water, wood, soil, nutrients, genes, species, and so on. For example, ecological connectivity is impaired when a stream is channelized and separated from its floodplain; when culvert installation blocks fish passage; when wetland fills or impervious surface prevent ground water aquifer recharge; when hillslope cuts breach seepage areas, springs, or underground aquifers; when aquatic habitat hydrological alterations and development interfere with surface water/ground water interactions and riverine hyporheic zones; among other things. Environmental impact assessments need to focus on identifying these connections and the consequences of disconnecting them. The upfront project design needs to incorporate the means for preserving and restoring these ecological connections. This concept is important for projects in ecological areas that are relatively intact, as well as in areas that have undergone extensive alteration and impacts. We offer our assistance in developing, reviewing, and supporting project alternatives that would improve and restore landscape permeability for aquatic and terrestrial animal and plant species, hydrology, and other ecological functions.

While many examples may be familiar already, we thought it might be helpful to share projects from elsewhere in the Pacific Northwest. We include those that have purpose, needs, and environmental issues similar to those of the Targhee Pass project, and where diverse partnerships and funding mechanisms have played a role in their successful implementation (see Enclosure 2).

**Threatened, endangered, and sensitive species**

ESA-listed species and Forest Service special status and management indicator species are among those that would potentially be affected by the proposed project. We note that ITD plans to address avoidance, minimization, and mitigation for these impacts in the NEPA document. For species listed under the Endangered Species Act (ESA), the NEPA document should include the Biological Assessment and the associated U.S. Fish and Wildlife Service (USFWS) or National Oceanic and Atmospheric Association (NOAA Fisheries) Biological Opinion or formal concurrence, and discuss how FHWA and IDT would contribute to the recovery of ESA-listed (threatened or endangered) species. All project phases (construction, operation, and maintenance) should be described with respect to their potential impacts to species and habitats. The NEPA document should describe the current quality and capacity of affected habitats, should analyze and disclose the extent to which the alternatives may cause habitat loss, alteration, and fragmentation, or disrupt breeding, resting, or foraging areas.

In addition to ESA-listed species, there may also be state-listed species, candidate state or federal species, and other sensitive or declining plant and animal species, and their habitats, in the project area. The NEPA document should disclose these sensitive species and habitats, and the document should include all appropriate measures to avoid and minimize disturbance or harm. Such information can be found in federal, state, and/or tribal guidance for protecting these species. The NEPA document should

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also demonstrate compliance with the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

**Invasive species**
Ground disturbing activities create opportunity for establishment of non-native invasive species. In compliance with NEPA and with Presidential Executive Order 13112, the analysis and disclosure of these actions and their effects, as well as any mitigation to prevent or control such outbreaks should be included. We recommend that disturbed areas be revegetated using native species and that there be ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasives in areas disturbed by project activities.

If pesticides or herbicides would be used as part of proposed project activities, the NEPA document should address any potential toxic hazards related to the application of chemicals, and describe what actions would be taken to ensure that impacts from toxic substances released to the environment would be minimized. To protect native plants and their pollinators, and to protect vulnerable water supplies, we recommend that the use of toxic chemicals be avoided or minimized.

**Climate change**
EPA recommends that the NEPA document include an estimate of the direct and indirect greenhouse gas (GHG) emissions caused by the proposal and alternatives. We also recommend that practicable mitigation of direct GHG emissions be considered in the NEPA document.

In addition, we recommend that the description of the affected environment include projected future changes that may affect the proposal. We recommend this include consideration of future climate scenarios, such as those provided by the National Climate Assessment.9 If projected climate changes could exacerbate environmental impacts of the project, these likely changes should be considered as part of the NEPA analysis of the impacts of the project.

**Noise**
The NEPA document should include analysis of the direct, indirect, and cumulative levels of noise and resulting impacts to communities, particularly those in close proximity to traffic areas and project area construction, operation and maintenance. The document should also identify any impacts to sensitive receptors, residents, businesses, and community facility users (e.g., schools, churches, outdoor recreation areas), and discuss the possible mitigation measures to lessen the identified impacts.

**Community impact assessment**
We recommend conducting community impact assessments for communities, neighborhoods, or populations that would potentially be most affected by the proposed project. These usually include communities adjacent to or bisected by a proposed project, although a more in-depth analysis of the direct, indirect, and cumulative effects of proposed alternatives may reveal additional affected populations/communities.

**Environmental justice, vulnerable, disadvantaged populations and communities**
In compliance with the NEPA, Executive Order 12898 on Environmental Justice, and Executive Order 13045 on Children’s Health and Safety, the NEPA document should include an analysis of the potential

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positive and/or negative effects that the proposed action may have on vulnerable populations, including children, persons with low income, minorities, the elderly, and the disabled.

We recommend that the following information be provided in the NEPA document:

- Describe the efforts that have been and will be taken to inform the communities about the impacts of the project to ensure meaningful public participation by the potentially affected communities and individuals;
- Identify low income and minority communities, as well as other disadvantaged/vulnerable populations, such as the elderly, children, and the disabled in the impact area(s) of the project.\(^\text{10}\) Include available information regarding human health conditions, such as incidence of asthma, cardio-pulmonary conditions or death rates, stress-related disorders, and other health impairments;
- Disclose in the NEPA document what was heard from the community about the project during the public participation sessions, by listing the impacts and concerns identified by the project proponent and the communities;
- Address whether these impacts are likely to occur and to whom. Evaluate these impacts, including direct, indirect, and cumulative, for their potential to disproportionately impact low income and/or minority or other vulnerable communities. Address whether the project may exacerbate conditions that are currently affecting human health and well-being in the project area (such as air pollution, noise, financial stress, construction zone traffic, safety hazards, and health effects, potential impacts to drinking water and subsistence food supplies);
- Describe how public input will be incorporated into the decisions made about the project (such as the development of alternatives or choice of alternatives); and,
- Propose mitigation for the impacts that are likely to occur.

**Tribal consultation**

In accordance with their tribal trust responsibilities, federal agencies are required to conduct government-to-government consultation with tribal governments.\(^\text{11}\) Special attention should be paid in the NEPA document to the environmental impacts of the proposed project on any tribal resources held in trust, or treaty resources. Trust resources include those resources held in trust by the U.S. government on a tribe’s behalf (such as tribal lands, minerals, and timber). They also include resources in which a tribe has rights that the U.S. government is obligated to protect, such as the right to use religious places and the right to protect the remains of their ancestors.

**Cultural resources**

The NEPA regulations, at 40 CFR 1508.27(b) (3) and (8), require that the effects of the proposed project on cultural resources be considered in judging the significance of the potential environmental impacts of the project. A variety of specific federal laws, as well as the laws of many states, Indian tribes, other jurisdictions, and a number of international conventions and recommendations, apply to the management of impacts on different kinds of cultural resources, such as:

- Historic buildings, structures, sites, districts, and landscapes;
- Religious practices, beliefs, and places;

\(^{10}\) EJScreen is a useful tool for this assessment: [https://www.epa.gov/ejscreen](https://www.epa.gov/ejscreen).

\(^{11}\) See the Presidential Memorandum of November 5, 2009 on Tribal Consultation, and Executive Order 13175, Consultation and Coordination with Indian Tribal Governments. Also, EPA’s Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples, which conveys the Agency’s thinking and internal policy on the subject.
- Traditional uses of land and resources;
- Ancestral human remains and burial sites; and,
- Traditional ways of life.

Federal agencies must be careful not to allow attention to NHPA Section 106 review to cause analysts to give insufficient consideration to other kinds of cultural resources. Not all cultural resources are "historic properties" as defined in the NHPA, i.e., places included in or eligible for the National Register of Historic Places. Hence, they cannot all be addressed through Section 106 review, but this does not mean that they do not need to be addressed under NEPA.

Related Executive Orders include:
- E.O. 13175, Consultation and Coordination with Tribes;
- E.O. 13007, Indian Sacred Sites;
- E.O. 12898, Environmental Justice.

Cumulative and indirect impacts
The project evaluation should consider the effects of the proposed project when added to other past, present, and reasonably foreseeable future projects, within and outside the project area. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over time. For example, cumulative effects from multiple projects in the area may adversely affect the same sensitive species and habitat that are determined to be affected by this proposed project.

EPA recommends including five areas of focus when assessing cumulative effects:
- Identify resources, if any, that are being cumulatively affected;
- Determine the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and would occur;
- Look at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
- Describe a benchmark or baseline; and,
- Include scientifically defensible threshold levels.

Indirect effects are those that are caused by the action, and are felt later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include additional development, or other effects related to changes in the pattern of land use, road systems and access, number and frequency of human visits/uses, and related effects on air and water and other natural systems, including ecosystems (40 CFR Part 1508.8). Such effects could result, for example, from pressures to later construct additional roads and highways. Completion of one project could facilitate the building of another, particularly if one project builds components needed by the later one. Such a scenario can also influence funding decisions, and the processes that affect those decisions. We recommend that the NEPA document include the analysis of reasonably foreseeable indirect and cumulative impacts, in order to comply with the purpose and intent of the National Environmental Policy Act.
Enclosure 2: Regional Project Examples

Interstate 90 Snoqualmie Pass East, Washington\(^\text{12}\)

The purpose and need for the I-90 SPE project are to reduce impacts on safety and highway operation from avalanches and rock fall, replace failing concrete pavement, add lanes to reduce congestion, and improve ecological connectivity across I-90. The Washington State Department of Transportation (WSDOT) is working with the U.S. Forest Service, U.S. Bureau of Reclamation, USFWS, Washington Department of Fish and Wildlife, Washington Department of Ecology, U.S. Environmental Protection Agency, FHWA, cities, counties, and community groups to develop and implement a long-term vision for a 15-mile segment of the I-90 corridor east of Snoqualmie Pass between Hyak and Easton. This vision includes re-establishing the north-south connectivity and function of the terrestrial and aquatic ecosystems and processes of the Washington Cascades, which have long been fragmented and impaired by Interstate 90.

WSDOT convened a multi-agency Interdisciplinary Development Team (IDT), and the IDT convened a multi-agency team of biologists and hydrologists, known as the Mitigation Development Team (MDT), to provide technical support regarding ecological connectivity and the development of an environmental mitigation strategy. These teams worked over a period of six years to guide the preparation of the NEPA environmental impact statement and develop workable solutions to meet the needs of the project. The MDT produced a Recommendation Package\(^\text{13}\) containing mitigation strategies, performance standards, and recommendations to guide development of ecological and hydrologic connectivity improvements for the project.

Prior to project construction, I-90 was a partial or complete barrier to wildlife movement, resulting in wildlife-vehicular collisions\(^\text{14}\) and ultimately—with a widened roadway, higher traffic volumes and speeds—demographic isolation. I-90 also impacted hydrologic processes, created a physical barrier to aquatic habitats and species movement, and degraded habitat within channels, floodplains, and associated wetlands. Highway fill and drainage systems altered the hydrology of wetlands above and below the highway and contributed to water quality problems in the Yakima River Valley.

To address species movement and habitat connectivity, the project includes large wildlife crossings at 14 Connectivity Emphasis Areas\(^\text{15}\) (approximately 1 crossing per mile), which are designed to accommodate both low mobility and high mobility terrestrial and aquatic species.\(^\text{16}\) These features,

\(^{12}\) [http://www.wsdot.wa.gov/Projects/I90/SnoqualmiePassEast/](http://www.wsdot.wa.gov/Projects/I90/SnoqualmiePassEast/)

\(^{13}\) Interstate 90 Snoqualmie Pass East Mitigation Development Team Recommendation Package, July 2006.

\(^{14}\) Between 1991 and 2001, over 240 deer and elk were killed in wildlife-vehicle collisions on I-90 in the project area—a serious safety issue for motorists and wildlife. Studies on the effectiveness of fencing in combination with wildlife crossings show that wildlife-vehicle collisions can be reduced by 80% when these measures are used. Recent reports from monitoring of wildlife crossing use on the Trans-Canada Highway indicate that there have now been over 70,000 crossings of ungulates and carnivores, and use by smaller animals is common.

\(^{15}\) Connectivity Emphasis Areas (CEAs) are locations in the project corridor where wildlife movement patterns, requirements for protecting aquatic habitats, and highway design requirements overlap to provide the best opportunities for meeting connectivity objectives.

\(^{16}\) Among the high mobility species that will benefit are mountain goat, deer, elk, Cascade fox, mountain lion, bobcat, coyote, striped and spotted skunk, pine marten, black bear, grizzly bear, wolverine. Examples of low mobility terrestrial species include shrews, ten species of terrestrial mollusks, two species of terrestrial salamanders. Plants, fungi, lichens will also benefit. Aquatic species include, but are not limited to, bull trout, steelhead, chinook, and a variety of amphibians. The Gold Creek CEA alone would benefit 46 mammals, 12 reptiles and amphibians, and 13 mollusks.
which will be combined with fencing to funnel animals to the crossing structures, take the form of bridges/underpasses, wildlife overpasses, and culverts. Small dry culverts are also placed approximately every 200 meters for small animal passage. Expanded bridges and enlarged culverts reconnect and restore hydrologic flows, channel migration, nutrient cycling, and water quality. Subsurface/groundwater flows are re-established at site-specific hydrological connectivity zones. The locations and design for each connectivity structure are developed in consultation with the multi-agency IDT/MDTs and the Technical Subcommittees for Stormwater, Wetlands, and Wildlife.

**Long-term goal:** Once completed, the resulting transportation facility will be effective in achieving a more sustainable presence within the natural environment because it is being designed to maximize the ecological benefits at, and between, each Connectivity Emphasis Area. The environmental benefits of this kind of design include:

- restored habitat connectivity and gene flow to sustain a diverse array of ecosystem types and species assemblages that occur from west to east along the corridor;
- improved passage for fish, including threatened steelhead, bull trout, and chinook salmon;
- increased/restored aquatic habitat;
- restored hydrologic flows, channel migration, nutrient cycling, and other in-stream physical processes; and
- improved water quality and groundwater flow.

Restoring ecological connectivity also supports the conservation and management efforts for game species, salmon, and ESA-listed species, such as, protecting the investment of over $120 million in salmon restoration in the Upper Yakima River Basin.

**Educational elements:** A remarkable partnership has developed between the I-90 SPE project and Central Washington University in Ellensburg. Many graduate and undergraduate students are using the I-90 SPE project for their school projects, including studies on pikas, amphibians, involvement in the pre- and post-construction wildlife monitoring, and more. Also significant is the substantial involvement of the Western Transportation Institute, a nonprofit consultant and research organization based in Bozeman, Montana. Tony Clevenger, who pioneered the ecological connectivity work on the Trans-Canada Highway, is the founder of the institute.

There has been, and continues to be, exceptional public outreach and involvement with this project. For example, the Wildlife Bridges Coalition\(^\text{17}\) (a non-governmental organization) has sponsored annual art and wildlife crossing design competitions for youth. These competitions have been featured by WSDOT in various venues. The public, Central Washington University, Conservation Northwest, and other environmental organizations have been involved as volunteers in order to monitor pre- and post-project wildlife presence, movement, and use of wildlife crossings, and to restore native plants at wildlife crossings. In addition, the Cascade Land Conservancy has worked for years to facilitate land exchanges and purchases in the project area to reduce the effects of checkerboard land ownership patterns.

**Repliability:** The I-90 SPE project is the subject of presentations at national and international conferences on transportation and ecology, where it provides an example of high standards for restoring habitat connectivity and ecosystem function at the landscape level. Its success can largely be attributed

to the collaborative partnerships formed, collective commitment to project goals, thorough vetting of the peer-reviewed technical recommendations, and the partners’ unified voice in support of project funding.\(^{18}\)

**Novelty Hill Road, King County, Washington.**
The King County Road Services Division recognized that the proposed widening of Novelty Hill Road would result in increased habitat fragmentation and wildlife-vehicle collisions. King County competed for SAFETEA-LU Transportation Enhancement funds to construct a wildlife crossing overpass by submitting an application entitled “Safer Wildlife and Community Mobility Through the Novelty Hill Road Corridor.” The Puget Sound Regional Council Transportation Enhancement Committee approved their proposal in August 2010, which provided $5,314,100 to fund 100% of the right-of-way and construction costs. The request for $425,000 for post-construction monitoring phase was not funded. The Novelty Hill Road wildlife overpass was the first to be constructed in Washington State.
https://www.associationvoice.com/ResourceCenter/Download/13210~300569?view=1

**U.S. 97, Oregon**
The problem of wildlife-vehicle collisions on U.S. 97 in Central Oregon has long been recognized as a public safety issue. Oregon Department of Transportation has built and plans to build additional wildlife crossings to improve highway safety and habitat connectivity. U.S. 97 is an ODOT statewide high priority wildlife collision hot spot, a statewide high priority wildlife linkage zone, and a known mule deer migration corridor.

**U.S. 95 Garwood to Sagle, Idaho**
As stated in the 2010 Final EIS,\(^{19}\) the U.S. 95 project corridor provides habitat suitable for wildlife and wildlife movement across the existing highway, which has been documented through animal/vehicle collisions, snow tracking and other studies in the area. This information was used to identify where wildlife undercrossings or other wildlife mitigation measures could be constructed to facilitate wildlife movement and habitat linkage. Expected increase in growth and land use changes in the area would affect wildlife movement even with the No Action Alternative. The project effects to wildlife movement would be similar for each action alternative as the road width would increase from the existing two-lane highway to a four-lane divided freeway and would add frontage roads, interchanges, utility corridors, and other components including fencing, bicycle/pedestrian facilities, and median barriers. Wildlife crossings were proposed to mitigate linkage effects as discussed in the DEIS Chapter 4, Section 4.11, *Wildlife and Vegetation Effects.*

Thus far, one wildlife crossing has been constructed in the Chilco to Silverwood segment of the project.
http://bestinmedia.com/media/com_hwdmediashare/files/13/69/ba/88b940afc3b0088c1381493452b2f518.pdf  See page 3: Chilco to Silverwood Project wildlife crossing

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\(^{18}\) http://www.seattletimes.com/seattle-news/environment/animals-getting-overpass-on-i-90/

\(^{19}\) FEIS Summary, page S-39
US 95 Garwood to Sagle, FEIS WL Crossing commitments: 
https://books.google.com/books?id=Opc1AQAAmA&pg=SA12-PA6&lpg=SA12-PA6&dq=US+95+Garwood+to+Sagle+wildlife+crossings&source=bl&ots=AE052B5PBc&sig=4B9fgKjhkhKhlTmgS6VttSQUmC&hl=en&sa=X&ved=0ahUKEwibpLeiotsSAhV5gCYKHSyaAU0Q6AEIHzAB#v=onepage&q=US%2095%20Garwood%20to%20Sagle%20wildlife%20crossings&f=false
Appendix C
Public and Agency Comments
July-August 2017
<table>
<thead>
<tr>
<th>Comment</th>
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<tbody>
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<td>101</td>
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| 103 | Thank you for your attention and for providing a public participation opportunity for Island Park.  
1.) Reduce speed limit  
2.) Passing lanes/slow traffic lanes  
3.) Widen road where needed  
4.) Cut back trees  
5.) Wildlife warning signage  
6.) Special signage during migration  
7.) Increased law enforcement patrol  
8.) Tell the public the truth/ you are considering overpasses/ the public did not know that to comment on it tonight  
9.) The Cramer – Cramer – 2016 study is completely compromised full of conflict of interest  
10.) Please refer to all of my previous submitted comments to the study team  
11.) Increase public participation |
| 104 | We need to cut the speed limit on Highway 20 to 55 and keep 45 through business areas. Do not cut public access to these areas for recreation, hunting or fishing. More policing to slow down traffic especially trucking. |
| 105 | 1. Put up flashing lights  
2. Reduce speed limit to 55 mph, 45 mph at places where animals migrate spring and fall. These are used at school crossing, drivers slow down.  
3. Put those vibrating road units in prior to coming up to crossing areas to get people to slow down  
4. Spring and fall migrations are in the most need, not the whole year  
5. Get NGO’s, individuals (Seidler/Truiter/Whitfield) to admit the goal is actually to create corridors for connectivity, then land use management  
6. Triple speeding fines  
7. Be more open with citizens who live here, when in residency they carry the right for the decisions on the road  
8. Get independent studies done, do not continue with those who are all connected together  
9. Remove individuals who do not live in the areas from the process |
| 106 | Safe passage for wildlife is extremely important. The accidents no only kill the wildlife, but is very expensive to repair vehicles (and injuries to humans) |
| 107 | Sign to Targhee Creek Pass is hard to see. It is extremely dangerous to make a turn to Targhee Creek, as there are usually vehicles right behind going at high speed and following too closely. Need better signage and left turn lane. |
| 108 | When human safety is endangers the two most critical issues to address is this.  
1) Speed Limit  
2) Truck traffic  
And if both of these issues are resolved the wildlife crossing issues would be addressed.  
Suggestions: Since we cannot issue enough citation for speed because we don’t have enough officers, purchase cameras to monitor speed and issue speeding tickets through the computer process. If we cannot monitor truckers through the scales, etc. – lowers their speed to 65 – vehicles 50 (55) trucks or at least night driving. |
| 109 | I support the overpass for the safety of animals and traffic – it’s going to help everyone in every situation. |
| 110 | Coming from a state that have over and underpasses that have worked I support this 100%. It’s a win, win! I now live in Island Park full time. Too many animal/human accidents. |
| 111 | I wonder why we need to have so much truck (semis) driving over I-20 thru Ennies, MT. to get to I-90? (Or thru Big-Sky).  
I think we should find a way to divert the semis away for I-20!! (Flatten or straighten the I-15 highway so they will drive thru that route to reach I-90)  
The semis need to SLOW DOWN!! |
| 112 | I agree with and support:  
Left hand turns (Bighorn Estates Howard Springs, Targhee Creek)  
Animal overcrossings with fencing  
Eliminate shade on dangerous curve, cut down on black ice  
A slower lane which could be used by trucks and autos (cut down on crazy divers who pas when not safe)  
Still Need: A plan to decrease traffic and ped. At state line sign. Is it possible to move sign to Howard Springs? |
| 113 | I fully support the building of wildlife overpass’s to mitigate animal/vehicle collisions. ATV and sportsman concerns should be addressed as best as possible but should not stop the building of the over pass. |
| 114 | Reduce and enforce 50 mph. Truckers are constantly following too close and passing me when I am going the speed limit. Automatic tickets cameras/machines may be a way of keeping speeders under control.  
Diverting trucks over to I-15 that don’t need to be in the areas of 20 would be a boon to our roadways and safety.  
Building overpasses/underpasses for wildlife is a critical area will help with human/wildlife collisions. |
| 115 | Highway 20 could use more left turn lanes to decrease vehicle collision, especially into Targhee Creek Access, Howard Spring. I drive from MT to Henrys Lake weekly in the evening and would love to see a decrease in speed limit near Targhee Creek, often because I see wildlife near (or on) the road but vehicles traveling too fast downhill. Also, state line and shoulders getting heavier use as tourist numbers increase in Yellowstone area (often slamming on the breaks when they see signs and other vehicles following)  
Strongly support wildlife over and/or under crossing along highway. Thank you for what you are doing! |
The idea of clearing and/or thinning trees within +/- 20-40’ of the right of way is an excellent idea. As a driver, I feel that I can see animals approaching the highway and therefore be better prepared to avoid an incident. Also looks nice. Today I learned that it also helps with winter sun helping to melt the snow that would increase the icy due to lack of sun.

Any large scale renovation of this section of Highway 20 must be linked to overpass/underpass/fencing to insure safe passage of migrating wildlife. Project of this magnitude will significantly impact the “usual” migration patterns across the pass and efforts should be made to minimize the distances that will inevitably be created during construction.

2) Get the trucks off Highway 20 – NOW!
3) Lower the speed limit, 45 all the way.
4) Lower the speed limit for trucks – 55 (if they can’t do 45)
5) Use nighttime speed limits, esp. for trucks

I’m very concerned about the traffic on highway 20 especially the truck traffic. There are many small communities in our area where the speed limit is 45 mph and cars are turning left. The truck traffic and speed limit makes these areas very dangerous. Please lower the speed limit on highway 20 and keep the freight trucks off our highway. Thanks.

We have too many trucks traveling on Rte. 20, endangering people and wildlife. We need to have a more active POE in Ashton to reduce truck traffic (assuming there are numerous trucks exceeding weight limits). I’ve never seen the station being manned. There should be lower speed limits beginning at Pinehaven to enhance vehicle safety for cars entering and exiting Pinehaven.

Problems I’d like to see address:
1) Halt illegal truck traffic on Highway 20: too much large vehicle traffic on Highway 20
2) Unsafe vehicle speeds near residential entry/exits
3) Unsafe vehicles speeds near migratory routes for wildlife (near Targhee Pass)
4) Inadequate speed limit enforcement on Highway 20

I am very much in factor of the wildlife safe passage, however in discussing the pros with the representative, I am concerned with one of the cons that certain accesses would be cut off. Could there be a discussion on this. Maybe someone form an outdoor business could be represented to get ideas that could help come up with solutions as to new hiking trails, snowmobile trails etc. This area is known for its tourism, and if this concern can be addressed, maybe more support will be given in a positive manner.
Hire to move equip and/or houses. Or wide objects. I have move houses and heavy equipment most of my life and any bridge or game crossing may have a terrible effect.
Also the 5 cent tax we passes was to improve existing roads not to spend on game crossing. This is another way for the change the original intent of what we were told the money was for.

Along with other obvious improvements need and planned for, consideration needs to be given to safety enhancement with regard to wildlife collisions. An overpass or underpass with fencing will protect motorists and large mammals. This corridor is an obvious place for Idaho first such crossing. If not here, the Sheep Falls is another needful area. Both areas should be considered.
| 123  | Thank you for the chance to comment.  
I support this project  
Suggestion:  
Because Island Park is a town that survives on tourism – solicit comments specifically for “outdoor” businesses (IE – ATV, snowmobile, and hikers) let them express their ideas and help with solutions. |
| 124  | Move game signs in the animals crossing areas. Like Targhee Pass and ponds and right here where we are having this meeting. Need to be flashing signs. |
| 125  | Have been a resident of Island Park for 52 years. I have one comment.  
Reduce the speed from last chance to Targhee Pass to 45 or 50 miles an hour, It will save life – human and animal. |
| 126  | Reduce speed limit to 55 mph on main highway with enforcement. |
| 127  | I pay ID sales, property and gas tax. It is very important to catch up with neighboring states who are doing a good job with saving lives – human and animal. |
| 128  | We’ve seen wildlife between MP 405 & MP 406. That seems the ideal place for some sort of crossing. Lots of animal movement between the meadow and stream on the north side of highway, and the wooded mountains on both sides. |
| 129  | Because highway 20 is Freight Route why aren’t we enforcing the speed limits especially in “45” mph day and night? |
| 130  | As being a boy scout I love the wildlife and it’s sad to see a dead raccoon, elk, deer and other animals to think what life was for him/her before he/she was hit by a car. Also with bears, moose, elk, and other large animals it not only hurts the animals but can hurt or kill people and destroy themselves and the car. On the migration season its worst more collisions, kills and injuries. And so that’s why I think we should make tunnels and bridges for the animals. Thank you for reading my comment. |
| 131  | Information on the frequency and costs of large mammal vs vehicle accidents on various stretches of highway project would make the need for and reasonable costs to be invested in reducing their interactions. Without this information it’s very difficult to make a recommendation. I believe this information is available and don’t understand why it is not presented to help for public opinion. |
| 132  | I suggest you go with your study from Patty Cremmer and put safe wildlife passages (3) over Targhee Pass and the many through the rest of Island Park to bottom of hill. I have documented and witnessed wildlife killed for years. This is a special area with special animals that are being killed every day. I have research the wildlife safe passages and found that they improve collision by 80% or more with wildlife. I am a 4th generation Idaho native and I speak for all my family on this highway 20 is a disaster to wildlife. We need the safe passages and we need to lower speed limits. |
What are the ITD alternatives for Targhee Pass?
Define the NO-Action alternative/cost?
What does ITD prefer – alternative/ cost?
What safety/wildlife enhancements can be effectively added to the project based on funds/impacts available?

As a frequent driver of Targhee Pass, as are many of my neighbors, I am familiar with the dangers of the blind curve and of the animals which are on the road. It is important for the safety of all to fix the curve install a passing lane and provide safe passage for animals, snowmobiles and four wheeler across the highway. It’s a no brainer. Doing while the road is under construction will make the total cost cheaper.

| 134 | 1) Bring road up to safety standards |
|     | 2) Reduce speed limit |
|     | 3) Remove guardrail and level west side of road |
|     | 4) No passing lane needed |
|     | 5) Straighten corner and remove trees as required to reduce shade and ice |
|     | 6) Use mobile wildlife detection systems during December – May. Move to other location rest of year. |
|     | 7) Use speed detection to display systems. |
|     | New car technology will prevent WVC in the very near future. |

Thanks for presenting the information to the public in this format.
My biggest concern is the number of wildlife vehicle collisions out Island Park, but particularly on the Targhee Pass area. Now that a major safety upgrade is scheduled on Targhee it is an opportunity to address the safety issue of WVC’s with wildlife mitigation in the form of an overpass with fencing. On another appropriate measure. Overpasses have proven effective and now it would be cost effective. It will also help preserve the important migratory route (corridor) and the resident moose population. Traffic and the numbers of people traveling over Targhee Pass is increasing exponentially and we need to plan for the future.
I believe lower speed limits would help, but I understand ITD is not will to look at this. To whom could I address this issue?
I believe encouraging truckers use highway 15 would help, but I understand ITD envisions highway 20 as a viable truck route. To whom could I address this issue?
I recognize lowering speed limits would require enforcement which is a Fremont. 
Lastly, a bike lane would improve possible safety. The number of bikes is increasing and again now is the time to plan for the future.

I spoke to most reps here today. Renee Siedler, Matt Pieron, Tami Trotter. What I propose are not their ideas but mine.
My suggestions come from theses “sources”:
1) Appendix C methods. Wildlife species preference for migration types.
2) My driving experience that big game travel @ night and more are killed them by vehicle.
3) Passing lane needed @ Targhee Pass
Suggestions: For deer, grizzly bear, black bear
1) Rep. Cramer study of 2013 that length of underpass maximum. Threshold of 140 feet. Width of underpass of secondary and height of 3rd instance. So elk and antelope won’t like migrate under a road and those types of animals that do must be able to see clearly through the other side.
2) Over pass for antelope, moose, elk needs to be alongside or very near where underpass is located. The overpass needs to be 150 feet wide – Ref. p. 93of “appendix of methods.”
3) Study further motion detector systems often. First overpass and first underpass are put in, in order to compare daily road kill count are reported by sheriff officers or highway patrol and highway department.
personnel. Then use that data for the next overpass, underpass for migrating animals. Simply take it one step at a time having migration over under passed based on species migration patterns.

4) Use photo animal’s detection devices on first underpass to study for one year migration. Do you see the types of animals and time of day animals crossed?

5) Are there areas of Targhee Pass where there are no migration over-under passes as on turn put in solar powered road light on each side of the road or staggered pattern. Since animals cross roads where they see car/trucks lights we want to use extra lighting as road light only on curves we cannot see around.

6) All fines for speeding in 45 mph areas got to migration over-under pass.

As a full-time resident of Island Park I would encourage the inclusion of overpasses for safe wildlife passage in both the Targhee Pass and by Sheep Falls to Pinehaven area. I believe that residents have chosen this area because of their love of wildlife and I believe strongly that human safety and vehicle safety would be improved by safe wildlife overpasses. Our neighboring states have found possible and effective to include these passages. I would hope that my home state would move to include such in their highway planning.

Furthermore, IDT has determined a “red light” toward reducing speed limits and reducing truck traffic on highway 20.

I would ask specifically for the speed limits to be reduced on highway 20 between Riverside Campground to the Osborne Bridge. This is including Pinehaven area where I live. I feel it is dangerous to pull in/out of Pinehaven. I appreciate and use our turn lane but the traffic speed remains a danger to myself and my family and guests.

In summary, please reconsider highway 20 safely by

1) Provide overpasses for wildlife
2) Reduce speeds where appropriate for human and animal passage
3) Reduce truck traffic as I feel the truck traffic is generally too heavy for the road surface maintenance and after going too fast even through lower (reduced) speed limits.

Thank you for your consideration several of our neighbors and visitors have had unfortunate encounters with animals.

My specific comments on Targhee Pass on attached map. However, these comments apply to the pass and all of highway 20 from Aston to Montana. Problems are:

- To many trucks – many consistently exceed speed limits and probably weight limits
- Fully staff (24 hour) weight stations and enforce all trucking regulations at these points.
- Install cameras/technology to enforce speed limits and ensure tickets to speeders by mail – this technology.
- WVC are arranged all along highway 20 is labeled effective wildlife overpasses or after process tech with 50% greater reduction

1) Reduce people and property risks from WVCs by diverting wildlife onto overpasses
2) Minimize adverse effects of road kill on Fremont county natural heritage and economy (tourist attraction) to other areas by including wildlife overpasses.
3) Improve safety during winter driving with signage and reduced speeding show something that improves safety for those driving on ICE
4) Be more active in announcing August meeting
5) Nice job providing info today
6) Highway 20 turnoffs need to be safe

I think this is a great start to the discussion but I hope it doesn’t end here. Wildlife is such a huge value in this part of the state – locals and tourists alike come here and stay here for the wildlife and as roads get busier, we need to incorporate wildlife into any and all transportation planning. Wildlife crossings may be costly upfront, but they work and they pay for themselves in +/- 15 years without safe passage for wildlife (which makes the road safer for people too – a win-win!) Wildlife will continue to get hit, cut off form habitat and other populations. An elk or deer herd can
afford to lose a member now and then, but what happens when the road gets so busy they stop crossing altogether? Economically, wildlife are a big part of the region, drawing tourists from all over the world. Morally, protecting wildlife for their own sake is the right thing to do. We’re the ones who chose to move into their habitat after all. Choosing cheaper and easier options for wildlife passage may seem like a smart idea in the short term and may appease taxpayers who think it’s a waste of money to build crossing structures. But that’s only a Band-Aid and it doesn’t fix the greater issue. Build crossing structures and fencing. Accidents drop costs per accident drop, the roads are safer for everyone. Safe wildlife passage isn’t about taking away rights, it’s about making sure everyone (people and animals) can use the road as safely as possible. I strongly encourage ITD to follow in the footsteps of their colleagues in Montana, Wyoming, Utah and Canada and incorporate safe wildlife strategies into transportation planning and engineering. I encourage ITD to follow Patty Cramer’s recommendations for crossing structures and locations. Let’s continue to keep Idaho a world-class destination for seeing wildlife, and keep US 20 safe for all.

1) We would like to see the tree cut down 75’-100’ on each side of 20 highway from the bottom of Ashton Hill to Targhee Pass. Let a dozen take wood as payment (cost to taxpayers 0). This would give drivers and wildlife a chance to live without abrupt contact.
2) What about two roundabout at Elk Creek and Yale Kilgore and Highway 20 (island par Village and Big Spring Loop) Slow traffic and allows good glow. Look at Idaho Falls.
3) Wildlife crossing with fence at Targhee Pass and 87 near Montana Border, near Sheep Falls.
4) Reduce speed. More enforcement of slower speed. Until both law enforcement take an aggressive stand (with tickets and stoppage) then drivers will tell one another “don’t speed through Island Park.. You’ll get a ticket”.
5) Truckers (because of size and weight/stopping distance) need to adhere to slower speed day and night.
6) More signage “stay right unless passing” in 3 lane area. (May be in Chinese and Japanese also) They pass in turn lanes in Last Chance and Mark’s Inn.
7) Widen side of road to allow pull off area and bikes.
8) Thank you from the bottom of my hear fort the new ramble strips. I’m full time and this was much needed to assure you aren’t off the road driving.
9) Lobby insurance companies to help finance these needed over/under passes. Two billion account for animal vehicle impact. This would cut pay for repairs, premiums, save lives (human and wildlife) Win! Win!

I am disappointed to see that so many wonderful options for the corridor ow already been dismissed. Lowering speed limits along I-20 from Sheep Falls to W. Yellowstone pushing 18 whatever from i-20 to i-15 etc. This is greatly disappointing to me and other residents of Island Park. Please move ensuring safe wildlife passages from a “goal/objective” to a “purpose/need” in your study. Please consider building an animal overpass (at least three on Targhee Pass) and underpass all along I-20. If we are going to encourage increased violations to Yellowstone National Park, GNNP as well as Harrison State Park and new federal lands. We meet also serve as a voice for the elk, moose and bear that are put greatly at risk by the transport day of larger commercial vehicles to the parks. Decrease pollution! Increase wildlife safety and fund two overpasses to allow safe passage for the animals upon which human development encroach upon. Idaho should join the rank of its more conservation minded including Wyoming on the conservation money that goes towards wildlife. After all these animals were here before we were. Each time we drive to Island Park spend about three hours on Highway 191 from Rock Springs to Hoback. Please look into the effectiveness of these recently built over/underpasses for wildlife passages as case study for effective goal reaching. Both to expand the highways and protect the native and amazingly unique animal population in the area. Do right and chose to develop these corridor but never at the expense of the animals population.

All for it as long as it does not allow us to access land for hunting and hiking and snowmobile access.

I believe the speed on the highway could solve the whole problem. If the speed limit was reduced from 65 to 45 for a month each spring and fall far less animals would be killed. I know a fence or bridge system would never work.
because of all the snow we get. I’ve been a resident of Island Park for 40 years and really don’t see any need to spend so much money on a fence when changing the speed would give the same results. The real problem is from Last Chance south, not North of highway 87.

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I do not think that the DOT or the Fish and Game should fund the wildlife crossings. I believe they are important but should be funded by private donation. Too many people that are pushing for these crossing are not residents of Idaho and are wanting Idaho residents to pay.

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As the Idaho Transportation Department considers how to best improve the safety of our families along with wildlife survival on our highways; and specifically through Targhee Pass. We have been wondering how our neighboring states in the West have approached these challenges. We share much history and many of the same challenges with our neighbors.

In Montana, work along US 93 has made our neighbor well recognized for the design and placement of wildlife crossing structures. Montana Department of Transportation is working to redesign a section of MT Hwy 200 to provide safe crossing for Bighorn Sheep. On US 93 North through Montana there are dozens of wildlife underpasses and one wildlife overpass.

Wyoming Department of Transportation installed 7 underpasses along a stretch of Hwy 30. They achieved an 80% reduction in collision with deer in the area. This project dates back to 2001. Wyoming completed six underpasses and 2 overpasses for pronghorn and mule deer in 2012 along Hwy. 191.

In central Arizona, based on 2002-2008 wildlife-vehicle collision data along SR 260, the highway department is in the process of installing 11 underpasses and 6 bridges.

Each year in Utah, between 3 and 5 people die on the roads in wildlife caused crashes. To improve safety, Utah has 45 wildlife crossing passages (25 underpasses and 20 overpasses). Utah Department of Transportation recently announced that early next year they will begin work on a major wildlife overpass at Parley’s Summit. Over the past 2 years, UDOT reported that 122 mule deer, 13 moose, 4 elk and 2 mountain lions died along a 13 mile stretch of I-80 between Kendall Junction and Lambs Canyon.

Our neighbors and friends in Utah, Wyoming, Montana and Arizona have experience with installed wildlife mitigation underpasses, overpasses and systems that reduce wildlife-vehicle collisions by 80% - 90%. We have the opportunity to protect our families and the traveling public in Idaho along with the wildlife migrating out of Yellowstone National Park that are part of the quality of life in Island Park.

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I would strongly suggest, because I use it a lot, that US 20 from Chester to Ashton be returned to 65 mph. I know that the big percentage go 68 to 70 when the limit is 65. However, as I drive that portion of road at least twice a day many people travel at least 80. I think 65 is better for that section of the highway, I would also like to see more solid double yellow lines to stop some of the passing.

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I’m totally supportive of the Targhee Pass ITD Plans. I hope everyone gets behind it. I’m so in favor of ITD efforts to support safer roads and highways for people and animals! We have 2 economic drivers to keep our town and businesses going. They are – 1. Animals and 2. Environment. This is our $ base.

150

Lower speed limits especially when it gets straightened – folks will go faster. IfS the local/county cannot address this most critical issue who is the person or committee in Boise that can address this?
Slow Speed Limits. Create Bike Lanes. Get courage to talk to feds regarding their non-understanding of the speed problems. Cowboy up ITD. Better access to Targhee Creek trail and Howard Springs. Port of Entry illegal trucks using Hwy 20.

We are residents of Island Park for approximately 6 to 7 months/year. We are supporters of improving safety along highway 20 including turn lanes to side roads and public parking areas such as the Howard Springs turn off. We also are very much in support of improving safety for both wildlife and vehicles traveling the highway. This includes fencing and creating wildlife overpasses in those areas where studies show wildlife move across the highway in large numbers at various times of the year.

I have several issues with this project, in that everything is geared toward wildlife issues. Why aren’t we concentrating on ways to make the highway safer for the travelers and the wildlife? Passage for wildlife in this 4 miles of road really only occurs twice a year. April/May then early Dec. Both of these occur when we have the least amount of traffic during the year. Most animals are hit predawn and late evening. I believe if night time speeds were reduced and by implementing animal signals, it would greatly reduce the number of animals killed or injured.

Highway 20 does need major attention but we need to do these projects as economically as possible. A 4 mile fence at the tune of 4.5 million not to include the overpass is not a good use of taxpayer $$. By using animal signals during these two times then moving them down US 20 below Pinehaven – they could be more usefully utilized. We have very few animal vehicle accidents on US 20 compared to many other Highways in Idaho. Also, we have had no fatalities in years due to animal/vehicle accidents. As per public use of public lands, I worry about human access to these areas if they are fenced off. Question – How are elk going to adapt to fencing, especially those migrating. Will they stall and not cross? This area is summer range. We could lose this vital herd of elk if they pull back and are caught in winter conditions.

Take down the “speed limit 65 mph” sign on the south entrance to Ashton – it’s too close to the town and comes right before the 45 mph sign. Better to put a “reduced speed” sign. A popular place for accidents to happen. Install over- and under-passes for wildlife crossing. Widen Shoulders. More turn-outs (especially on the pass)

1. Widen highway 20 from Chester to Ashton
2. Lower speed limit approaching Ashton from the south
3. Do install shoulders and pullouts throughout Highway 20 from Ashton North
4. Install overpasses and underpasses for wildlife migration
5. Cut some trees to improve visibility to reduce wildlife collisions

Dear District 6 Engineer Jason Minzghor,

I support Safe Wildlife Passage along Targhee Pass on Hwy 20 because:
Allowing wildlife to move safely across this four-mile street protects people and wildlife.
This area is an important migration corridor for big game and in important linkage area for grizzly bears and wolverines.
Protecting migration corridors maintains healthy wildlife populations in the Greater Yellowstone Ecosystem.
Without safe wildlife passage, increased traffic to and from Yellowstone National Park will result in more wildlife vehicle collisions, more property damage, and more human accidents and fatalities.

Please make sure safe wildlife passage is incorporated in the design and construction for Targhee Pass on Hwy 20 through Island Park. This is important to me and the next generations of Idahoans.
We have overpasses in Utah. They work!

[Additional comment added to Form Letter 156]

Please make the investment to protect wildlife!

[Additional comment added to Form Letter 156]

Since submitting earlier comments on the recently released ITIP, additional information has been posted on the Targhee Pass EA page, and I would like to add to the comments I previously submitted. I am a homeowner (19 years) in Island Park.

I am disappointed that there is no mention of wildlife issues in the "Purpose and Need" statement posted last week for the Targhee Pass EA, and that wildlife issues are in last place in the list of specific needs under "Driver Safety." Under "Goals and Objectives" it is the last of two items still “to be evaluated.” This concerns me regarding ITD’s approach to the entire section of the US 20 Corridor from Ashton to the Montana State Line.

Wasn’t wildlife movement already evaluated by ITD consultant Patty Cramer in an extensive report commissioned by ITD? And weren’t detailed mitigation measures recommended in that report? Further, wildlife issues should not be the last thing that ITD thinks about.

Wildlife is an important community value in Island Park - critical to our economy and an essential part of our mountain lifestyle and heritage. It is important to Island Park residents to reduce vehicle collisions as well as to protect wildlife habitat connectivity. ITD hired expert consultant Patty Cramer to identify wildlife solutions along US 20 for a reason. ITD should follow her recommendations. I cannot imagine why you would do otherwise.

Therefore I am deeply concerned that I do not see those recommendations adopted in the ITIP plan - which appears already to have a draft budget. The consultant’s recommendations should be utilized before you determine budgets - and ITD should budget for recommended wildlife mitigation along all of US 20, the iconic gateway to Yellowstone.

The need for speed reductions from Ashton to The Montana state line is a huge issue, especially as traffic inevitably increases in coming years. US 20 through Island Park is a terrifying road regarding traffic speeds. Lower speed limits with strict enforcement would keep humans and wildlife safer, and would reduce speed dispersion coming in and out of speed zones in populated areas. There is no need for drivers to race through our beautiful landscape at 75 and 80 mph, jeopardizing other vehicles, people, and animals. ITD should work with the state highway patrol and Fremont County Commissioners to enforce reduced speed limits.

In addition, there is unanimous sentiment in Island Park that truck traffic should be moved away from US 20 to I-15 which is better designed to handle large trucks than a two-lane US highway through populated areas. The weigh stations need to be staffed, and all through truck traffic should be required to use I-15. A truck driver acquaintance confirms trucks favor US 20 in part because the weigh stations are not consistently staffed - which means that trucks can get away with infractions.

Thank you for your consideration.
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| I will not be able to attend your workshop.  
Here are my comments. |
| - I can not justify the cost of OVERPASS/FENCES with my state tax dollars. If the NGO’s will pay for this it is probably a good alternative if no restrictions for hunting, etc are applied. |
| - My suggested alternative is to clear vegetation at least 100’ on each side of the highway and lower the speed limit to 45 MPH in areas of the migration routes and lower it to 55 MPH from Ashton to the Montana line. |
| - Enforce Speed Limits |
| Thanks for allowing me to comment |

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<tr>
<td>In light of Idaho Transportation Department's request for public feedback on the Idaho Transportation Investment Program, I would like to share my comments.</td>
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<tr>
<td>As Idaho plans for the next generation of highway projects, it is of utmost importance to address the safety of humans and wildlife in the planning process. I commend you for your projects that specifically note improved fish and wildlife passage, and request you design and fully fund appropriate wildlife crossings that in areas where wildlife are often near or on roads.</td>
</tr>
<tr>
<td>I am particularly interested in the extensive expansion and maintenance proposed along U.S. 20. Iconic animals such as elk, moose and grizzly bears must be able to safely cross this highway near Yellowstone National Park. Wildlife positively impact Idaho’s economy, cultural identity and way of life – all things I value. I am also concerned for people's safety. By facilitating the safe passage of wildlife, you will also ensure increased safety of the many people who drive U.S. 20 each day.</td>
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<td>In 2016, ITD completed a study that recommended wildlife solutions on Highway 20, including slowing speeds, fencing, and overpasses and underpasses.</td>
</tr>
<tr>
<td>As ITD looks to significantly expand U.S. 20 through Island Park, I ask that you implement these recommended solutions, including overpasses and underpasses from Ashton to Dumpground Road (Key#19711), at Sheep Falls to Pinehaven (Key# ORN20379), Pinehaven to Buffalo River (Key# ORN20382), Targhee Pass (Key# 14054, 19913), and State Highway 87 north of Henry’s Lake (Key#19969).</td>
</tr>
<tr>
<td>Wildlife under- and over-passes, speed reductions, and fencing need to be key components of your project plans, as they have been proven to greatly improve safety for drivers and animals.</td>
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<tr>
<td>Thinking about highway safety and wildlife-friendly alternatives before design makes sound economic and project management sense, and I trust that the Idaho Transportation Department will do everything in their power to ensure of the safety and continued prosperity of wildlife and people in the region.</td>
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<td>I was just made aware of the public meeting that will take place on Thursday, July 27th. I am not able to attend the meeting, but as a property owner at Big Horn Hills Estates, I want to offer comments after reviewing the objectives and recommendations listed on the website.</td>
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While I am in agreement with the "needs" and "plan recommendations" listed, I would also ask that you address two things that were not clearly identified.

1) With the projected increase in truck and recreational vehicle traffic, I feel strongly that the increase in noise needs to be considered along the Big Horn Hills Estates boundary.

2) After reviewing the concerns for wildlife, safety, weather conditions (ice, wind blown areas), drainage, and traffic, I would offer that the speed limit should be reduced. An alternative would be a slower speed limit for trucks, and at night.

3) For the area identified as a frequently used, wildlife crossing, I would suggest flashing, warning signs, and again, a reduction in speed.

I appreciate your consideration of my comments and ask that they be included in the public record.

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| There have been several comments lately about lowering speed limits as an inexpensive and effective way of reducing animal vehicle collisions on Targhee Pass. So let me ask all of you a question: Do you obey the speed limits in Island Park all the time? Some of you are thinking “Yes, of course”; others are thinking “Well, most of the time, unless I’m in a hurry or not paying attention to the speedometer”;; and others are thinking “Speed limits are for sissies”. Then there are the people just passing through to whom a 45 mph zone is a nuisance and 65 mph is unreasonably slow. The point is, if we can’t get drivers to obey the existing speed limits, it’s naïve to think they will obey additional speed zones. Targhee Pass is one of several locations in Island Park where animal/vehicle collisions occur; to institute 45 mph with adequate (read 24/7) law enforcement presence year after year after year… forever, would not, in the long run, be a cheap solution. In other communities that are also struggling with animal/vehicle collisions it has been shown that efforts to influence driver behavior, such as signs and lowered speed limits, are the LEAST effective way to reduce collisions, a “duct tape-and-bailing wire” attempt at best. Animals are hit and killed in the 45 mph zone on hwy 87. Yellowstone has a 45 mph speed limit and much greater law enforcement presence yet animals are still hit and killed. Island Park is not Yellowstone nor do we want to become an extension of Yellowstone.

Visitation to Yellowstone is on the increase and shows no signs of slowing down. Much of that traffic comes through Island Park and over Targhee Pass. Vehicle technology is making cars safer at higher speeds and higher speeds mean longer stopping distances. This technology may or may not be able to completely avoid collisions but it will make for slower speed collisions which will be less injurious to the occupants of the vehicle. But a car at 15, or even 5, mph is a formidable weapon. A minor impact that results in only a small dent to a bumper, “just a tap” so to speak, can break an animal’s leg or cause severe internal injuries. The animal may not die on the side of the road for all to see (just ask a hunter how far a lung-shot or gut-shot animal can go) but the animal will die. It’s unknown how many of these collisions occur. Since there are no human injuries, minimal vehicle damage and no visible dead animal, the incident may not be reported. The reported incidents could be a mere fraction of the animal deaths but there’s no way to know for sure. The best solution is to get the animals off the highway.

The Idaho Transportation Department (ITD) goal is to move traffic quickly and safely. Safe wildlife passages (overpasses and/or underpasses) can help them achieve that goal. Installing them on Targhee Pass while the highway is already under construction in 2021 will help reduce the cost and inconvenience. Will they cost a lot? Yes, about $1-2M per structure but there are no other options that are nearly as effective (if there were effective alternatives, of course they would be pursued, but they just don’t exist). Will private land be taken for them? No, the plan is to put them on public land. Is there a secret
government conspiracy behind it? No, it’s just a sensible local solution to a local problem initiated and supported locally by your friends and neighbors, concerned folks who have done the research and have come up with the most logical and cost-effective long-range solution.

For more complete information check out the Island Park Safe Wildlife Passage facebook page at https://www.facebook.com/islandparksafewildlifepassage

To those who have been so vocal about “not having a voice” in the Targhee Pass safe wildlife passage issue and who have not seen fit to attend one of the many public meetings that have been held in the past several years, I invite you to yet another public meeting to be held on July 27, 2017 at the EMS building from 4-7 pm. Everyone is invited. After all, this is America and everyone has a voice, even those in the minority (and a big “THANK YOU” to our military for protecting those rights). Bring an open mind, check out the facts and judge the issue of safer roads in our community on its merits. Along with the local folks there will be “outside” experts to answer your questions. Outside experts are not a bad thing. After all, how many of you go on the internet every day and take the advice of outsiders, of total strangers, when looking for the best car, appliance or other equipment to buy or the best way to perform various tasks. At least in this case, the experts and their ideas have thoroughly researched and analyzed by concerned, responsible citizens of Island Park to come up with a solution that works for our community.

The public comment period on ITD’s multi-year plan for highway 20 from Ashton to Targhee Pass and highway 87 to the top of Raynold’s Pass ends on July 30, so there’s another chance to speak out. But there is a group that does not have a voice. The animals that risk their lives to cross the highway to get to their wintering grounds, to get to better graze or even just to get a drink of water. Imagine if you and your kids or grandkids had to cross the highway at Elk Creek every day, twice a day, back and forth, just to get a drink of water. Now imagine doing that in a 65 mph zone. Wouldn’t you want ITD to make that crossing safer for you and your kids? Wouldn’t you demand a safer crossing, maybe a stop light with a cross walk or an elevated walkway? Of course you would. Let’s speak out for those that truly don’t have a voice.

Every single day of the year someone from Island Park drives over Targhee Pass to West Yellowstone. They do it for work, they take their kids to school, they visit and recreate with friends. These are citizens of the City of Island Park, our neighbors and friends. ITD plans to widen and straighten that section of road in the coming years making it more difficult for animals to cross and increasing the possibility of a collision with one. And the animals will continue to cross the road; they have to or they will starve to death in the long, cold winter. Wouldn’t it be wonderful if, by the time those kids who are being driven to school today are old enough to drive themselves to school, they have not just a wider road to drive but a much safer one. The inclusion of safe wildlife passages in the planned construction would go a long way towards that goal. If we don’t want to build them for ourselves, let’s do it for the kids and all future kids.

It’s beyond me why anyone in their right mind would oppose safer roads in our community because of what may or may not be going on somewhere else. This is about what’s going on here. It’s about an animal/vehicle collision rate 5 times the national average. It’s about making our roads safer while preserving our community and the wildlife we love.

God Bless America, where everyone has a voice. Let’s use ours. Come to the meeting and speak out in favor of safer roads.

For those of you who missed the ITD scoping meeting last Thursday on highway 20 over Targhee Pass and the problem of wildlife/vehicle collisions, it was very informative. They addressed every concern that has been brought up and discussed all the mitigation strategies as to cost and effectiveness. It was a case of
“you get what you pay for”. The less expensive solutions were the least effective and the most effective solutions were the costliest. I heard a great deal of talk about lowering speed limits and ticketing offenders through the use of cameras (which would be ineffective at night and in other low visibility situations when most of these collisions occur) or extra law enforcement officers (contrary to some people’s beliefs, ITD can NOT spend the Sheriff Department’s money) but that only punishes speeders (a good thing in and of itself), it does nothing to prevent speeding in the first place. It was clear that ITD has extensive knowledge and a pretty solid understanding of the very baffling field of driver behavior, as much as anyone can understand it. As one ITD representative put it, people will drive as fast they feel comfortable, and on a road such as Targhee Pass that is engineered to be safe at 65mph(except for the blind curve), it is virtually impossible to make them to go slower. As much as we’d like to believe differently, that is the reality. The truth is that the only driver behavior you can control is your own; after all, it’s your foot on the throttle. You can’t even control a driver’s behavior when you’re a passenger in the same vehicle (just ask any back-seat driver)! It’s been shown over and over again that attempting to change or control driver behavior is the LEAST effective way to prevent wildlife/vehicle collisions. That’s the reality and it’s naïve to think that it will be any different here.

Having said all of that, speed is only one of several factors in any accident. Visibility, time of day and/or year, distracted driving (intoxication, fatigue, cell phones and other electronics, inattention, apathy, ignorance of rules, etc), road and weather conditions, and individual animal behavior all can play a part. Since changing all of the human and environmental factors would be an impossible task, changing the animal behavior by redirecting them to an over/underpass is the logical course of action.

The question of whether or not to spend the money to put in over/underpasses for wildlife (and snowmobiles) with the necessary fencing, is a little like making the decision to buy a new car. You throw money into the old car because it’s cheaper at that moment to repair the old one than to buy a new one. But at some point enough is enough; you “bite the bullet” and spring for that new car. The sooner you get the new car the less money you waste repairing the old one. Then you look for the best deal on the car you want. So why waste money on ineffective wildlife/vehicle collision prevention strategies just because they are cheaper? Are they really cheaper in the long run in terms of equipment, salaries, vehicle damage and potential lives lost? When will “enough be enough”? We have the opportunity to get the most effective strategy “on sale” (over/under passes will be cheaper to build when the roadway is already under construction). Why not take advantage of that just as you would when buying a new car? Yes, there will be some maintenance required in the future just as there is with a new car but if the structures and fences (and your new car) are well built to start with, those costs will be minor. It makes solid fiscal sense to “bite the bullet” and buy them now.

Enough is already enough.

166

I am writing to support the implementation of wildlife passages both over and under highway 20 when the road is reconstructed. As a resident of Island Park from May through October I have seen the consequences of several wildlife/vehicle collisions. Additionally, signage warning of wildlife in roadways should be in several languages, at least Northbound (and Eastbound) to Yellowstone Park.

Thank you for this opportunity to comment.

167

Unfortunately, I was out of state for the meeting held in Island Park for the Targhee Pass Environmental Assessment meeting. This was tragic, because I had lobbied long and loud for meetings held while summer residents were in Island Park. That said, I have been provided with the documentation that was apparently given out to attendees, and I found this very helpful (love the red light and green light!). I do believe that having passing lanes for northbound Highway 20 traffic, going up the Targhee Pass hill, would
be very beneficial to frustrated motorists who happen to be behind all of the slow-moving RVs going to Yellowstone National Park. Frustrated motorists tend to do stupid things once they have a passing lane, so a long uphill passing lane would be a wonderful option. That said, this would be complicated by a wildlife passage, but with 10% of the accidents between Chester and Targhee being caused by wildlife, I believe that a passage with fence would be the most effective alternative. If this is ultimately voted down, at the very least, a very, very bright and eye-catching digital sign would be the very least that could be done, combined with a message to slow to (say) 45 or 50 mph, even though the slowing option shows a 0% increase in effectiveness. Perhaps a combination of the sign and the speed limit would result in a higher than 50% increase in effectiveness.

I hope to be in attendance at your next meeting. I do not believe that I received notice of the July meeting. Is there a way to be on the mailing notification list?

Thank you for your time.

I would like to voice my opinion on the Targhee Pass road.

The Environmental groups that want overpasses like in Jasper Canada are a joke. What planet do they live on. This small area to put a 4 million dollar fence is ridiculous!!! You can always tell a government funded program. They continue to forget it is our money that funds they waste.

I have spent 40 years in this area. I have a biology degree. This area is not a big migration route anyway.

First. No perfect thing exists to have a 100% success on animal deaths. Just like humans.

Second. Migration routes are just that. The animals that do migrate do it in a few short days. It makes much more sense to set up signs and lower speeds for these few short time frames. The times most animals are hit is dust and dawn when they are moving. Very rare during the day or even in the middle of the night.

I have followed what use to be the biggest migration of elk from South area of Yellowstone and Island Park to the desert to the west. It use to be 2 groups of around 2000. They moved the entire way in about 2 days in the late Fall and Winter. One of the groups stayed some years as much as 30 days longer than the other. Weather depending. The Ashton Hill area is a much larger migration area.

The Targhee Pass is getting more attention because of its proximity to Yellowstone National Park. The Y2Y people are INSANE!! This all started years ago with some Biologist's THEORY that population of grizzly bears in the park was only 40. They would become extinct if they did not set up a corridor. Then came all the green gates. Closed off roads that had been open for 100 years. Very flawed research!!! They left out Highway 20 and I-15 and pretended that these remote roads in use caused the bears not to move.

Bears do not migrate that far!!! Then came reality. A study of bears around Yellowstone Lake pulled hair samples on 12 streams and did DNA at Montana State. They found 87 different grizzlies. The number went to 400 rather than 40. Conclusion is the Wildlife people have not a clue!! They still do not today. The Y2Y people were born. If bears and wolves migrated so far. We would not have to introduce anything!! The wolves and moose are much larger to the North for a reason. This whole thing is a theory. That means NOT Fact!!!
The elk in Jasper basically stay in the area!! This Y2Y is based on false research and a bunch of idiots who like to spend others money and do not have a real job.

I'm sure they were in total support of the wolf transplant experiment. It was great unless you were an elk, moose, deer, coyote, or fox. The elk are the easiest to see the decimation. No plan ever existed to control the wolves. Talk about screwing up the ecosystem. 18,000 elk to 3,000. An yet the environmental groups would have you think that it is natural. No common sense. Now were worried about hitting 20 animals. I guess the animal lovers have never seen a wolf or grizzly tear the throat out of an elk and tear it apart while its still alive. They would probably pass out and miss the whole thing.

If you believed the Y2Y theory. The wolves and grizzlies would already be here in large numbers!! In their world if we could just get rid of a few million people and remove some interstates and roads we would have animals wandering all over the West. Then their is reality!!! They always forget in their research that humans are part of the ecosystem and have to be counted in the equation.

The Targhee pass death toll was 13. I thought that was much lower than expected. So we are going to spend 4 million to stop 13 deaths. They are animals. Not people. With only 13 deaths. I would say that proves it is not a migration path.

I do believe we can reduce the amount of collisions with simple cost effective steps.

Step up signs in Spring and Fall.

Cut back some trees from the roads for visual.

Slow speeds down 10 mph during these times.

Flashing signs do make people aware and work.

This is a very short area and can easily be improved at a minor cost.

Of course the government study and the opposition to a common sense approach will most likely cost more than doing simple things!!!!

And yes their is no perfect in the world.

I hope this will provide some perspective and some common sense. I'm sure I have hiked more of these areas in 40 years than any of the Y2Y people. I appreciate the chance to respond and be considered.

169

I am adamantly opposed to the proposal to build wildlife passageways in Island Park. I especially am opposed to using highway funding for this project. Our roads need improvement.

170

I am against doing over passes for the wildlife. I do not want to see everything fenced off. Lower the speed limit to 45 like Yellowstone if you must but do not fence off everything and tear everything up to put in over passes. The money that would be used for overpasses could upgrade the roads in that area.
I wanted to have my voice added to this discussion. The open house held on this subject a couple weeks ago, did not allow for public comment at the event, which I think was absolutely wrong. I have major issue with a special interest group taking part in this study in any way. There can not be an unbiased study when special interest are a part of it. I also have issue with this corridor going all the way to the Yukon territory in Canada. If we don't put Idaho first and allow not just Feds but also other nations to be a part of planning and funding, you give away our sovereignty and freedoms. I believe our highway funds would be better spent repairing and maintaining our roads. If safety for drivers and animals is truly what's at point here, then continue to trim back the pine trees to get rid of the shadow they cast on the roads and if you must, lower the speed limits. The idea of fencing off the entire corridor is not just hard to believe but also will be incredibly intrusive to the natural migration routes of the animals you say you want to protect. Also, to make over passes for them is not going to work well. I lived in Washington state where they made these over passes down by South Gate on the I5. They were never used by animals. They were a running joke among the locals there. Please don't waste our tax dollars on this idea. Please represent the people who pay taxes to fund ITD, IDAHO tax payers. Please do not give up Idaho's voice in what is best for Idaho.

I attended the recent information session regarding the Targhee Pass reconstruction and environmental assessment at the Island Park EMS building, and have taken a few days to organize my thoughts. I am a 40+ year recreationist in Island Park, and have owned a cabin for more than a decade. Like others, I have watched the steady increase in traffic over the years, with the accompanying increase in actual accidents and near misses along US 20 from Ashton to the Montana line. I recognize the information session and the EA are specific to the four-mile section of US 20. Including Targhee Pass, but my comments are germane to all of US 20 and Highway 87 in the caldera.

Personal safety from collisions is the primary concern. By collisions I include vehicle-vehicle collision and vehicle-wildlife collisions.

The proposed road reconstruction calls for improvements in the condition and route of US 20, and possibly a climbing lane for trucks. While a climbing lane would increase safety by separating slow moving passenger vehicles, ITD is doing the public a disservice by encouraging long-haul truck traffic through Island Park. There is no logical or defensible reason to allow pass-through semi-trailer traffic on any of US 20 north of Ashton. While US 20 is designated a freight route, that designation predates the Interstate Highway System which was built specifically for interstate traffic. Rather than spend millions on a climbing lane towards Targhee Pass, pass-through truck traffic on US 20 should simply be eliminated and interstate truck traffic routed to I-15 which was constructed for hauling heavy loads.

Second, as traffic continues to increase on US 20, as it most certainly will, vehicle-vehicle collisions (VVC) and vehicle-wildlife collisions (VWC) concomitantly will increase unless steps are taken to reduce the risk. The severity and most likely the incidence of VVCs can be reduced by simply reducing the speed limit. One of the storyboards at the information session gave “Lower the speed limit” a red light and stated: “Lowering speed not called for in the corridor plan. Speed limit decisions made through a broader statewide process (beyond the project scope).” While I acknowledge those statements are true, they ring hollow. Speed limit consideration should be part of the corridor plan. In fact, it is inexplicable (and inexcusable) that speed limits are not part of the plan. And, the process whereby speed limits are set on a statewide basis rather than specific to an area as rich in wildlife and replete with seasonal traffic as Island Park, would be laughable if it wasn’t so thoughtless and illogical. Local conditions should dictate local
standards. One shoe does not fit all. I strongly encourage ITD to take speed into consideration in the Targhee Pass project, as well as in the entire US 20 corridor from Ashton north.

Last, VWCs are a dual problem: human safety and distortion of wildlife movement. We know the VWC rate in US 20 in Island Park is five times the national average. To the best of my knowledge there has not been a human fatality as a result of a VWC, yet. It is only a matter of time before that statistic changes, with the odds increasing as traffic on US 20 increases. The best solution to reduce VWCs is to separate vehicles and wildlife. This is successfully done by providing some sort of wildlife passage under or over a roadway. Studies funded by ITD identified Targhee Pass as one of several areas along US 20 in Island Park which are high use for animal movements: both daily and seasonally. Additional analysis by ITD funded study identified areas where under or over passes would be most effective. I strongly encourage ITD to use their funded studies to develop safe wildlife passage opportunities. These structures not only protect wildlife and motorists, but are, in the long run, cost effective.

In summary:
- Get the semi-trailer rigs off US 20.
- Lower the speed limit.
- Use the data from ITD sponsored studies to implement safe wildlife passage measures.

Thank you for the opportunity to express my concerns and opinions.

173

I would just like to let you know that the proposed construction on Hwy 87 is a waste of time and money. I have worked for the Fremont County Sheriff’s Office as a dispatcher for a little over 5 years, and I have had zero vehicle vs animal crashes on that stretch (Hwy 87) on my watch. I have, however, dispatched for more crashes than I can count on Hwy 20 due to 2 lane areas where it should be 4 lanes, potholes and crumbling road conditions, as well as animals.

Hwy 87 is not the problem. It is a completely Hwy 20 problem, that needs to be addressed sooner than later. Using the funds allotted for the proposed project is not beneficial to anyone who travels in Fremont County.

Thank you for your time.

174

Didn’t listen to nay sayers. Put what needs to be in place over, under whichever or both. Please do this for purpose of safety for those in autos and to assist wildlife.

175

I am in support of the wildlife passage initiative on highway 20. I am a 3rd year summer visitor to the area and appreciate the wildlife and would like to see protections in place to make it possible for animals to pass safely and protect drivers. Thank you for your consideration.

176

I am in favor of wildlife passages under Hwy 20 in Idaho up to the Montana border. Just last night we saw an antelope crossing the road and we had to hit the brakes hard to avoid hitting it. We also saw a bull Elk and multiple mule deer doe along the side of the road last night as we were returning from Montana. We
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<td>177</td>
<td>I am in favor of wildlife passages across hwy 20 Idaho either underpasses or overpasses. This would reduce wildlife deaths and reduce number of vehicles being damaged and/or drivers and/or passengers being injured and/or killed.</td>
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<tr>
<td>178</td>
<td>i have been wrighting and emailing ITD for years to lower speed limit on hwy 20 to 50 and 35 in slow areas due to the very large amount of wildlife kills on this hwy,you metioned on one email about safe passages,so i have done my research and found the passages improve this problem by minimum of 80% and average 90% or more in wildlife collisions. So i think ITD should go with the studies recommedation of the th 3 over passes on Targhee Pass and through out Island Park to Chester. To me Yellowstone starts at the bottom of Ashton Hill,we have one of the largest animal migrations in the west here inisland Park and the safe passages would be money well spent to preserve our Wildlife in this area and exspeceialy when there is plans in the works to widen hwy 20 just makes good mobey sense to do it at the same time. I have also seen these passages work well above Lucky Peak the area i grew up at,you use to come around that corner and always deer in the road,they put the tunnel in and no more problem. This is the best solution for the future of or wildlife in Island Park,just in 10 years i have been here i cant beleive how much traffic there is,i hate going down the hill i take my life in my hands every time and i am not some old fart either! Lol but i see near misses everytime on hwy20,close head on's, people pushed off the road,that just happened to me by a nice california camp trailer,no punt intended i lived in that state for awhile also so i am allowed.I still think speed limits should be lowerd for public safety,if you have it at 65 they go 75 or 80 and pissed that you are not doing the same! But not just here all over speed limits have been raised in rural areas,like warm river rd going through Marysville,60! There are farm trucks pulling out,dogs&amp;kids in the road plus wildlife,your new engineer needs to go back to school! Or doesnt he calculate all those other factors,all ready more wrecks sense the raised to 70 on hwy 20 where its still 2 lanes bumpy road just had head on fatal wreck,the faster speed limits less chance of survival. I do know which ever the side of the fence people are on about the passages All want speed limit lowerd! Anyway the future of our wildlife seems to be in ITDs hands so please think of the future, people are coming here in droves what will it be like in 20 years? Doesnt look good to me. Thank you for your time about this matter.</td>
</tr>
<tr>
<td>179</td>
<td>I fully support measures to improve safety for people, animals and vehicles traveling the highway 20 corridor from Chester to the Montana boarder. Lane widening, over/underpasses and re-engineering will improve safety. It appears the criticism comes from a political perspective that does not take into account future cost increase and current safety to people and wildlife. My comment was reinforced by my trip over the pass last night at 10pm, when I encountered a bull elk, deer and antelope on the Idaho side of the pass. I am a 30 year property owner in Island Park. Fix the problems sooner than later.</td>
</tr>
<tr>
<td>180</td>
<td>Thank you for considering our scoping comments on the Idaho Transportation Department (IDT) Targhee Pass expansion project. Since 1973, the Idaho Conservation League has worked to protect and Idaho’s clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. As Idaho’s largest statewide conservation organization, we represent over 25,000 supporters who have a deep personal interest in protecting our wildlife and scenic values from human impacts.</td>
</tr>
</tbody>
</table>
We appreciate the opportunity to comment on the Targhee Pass project. Our members are concerned with wildlife connectivity, safe transportation corridors, and the creation of wildland corridors to facilitate migration patterns. We especially appreciate considerations given to wildlife by ITD, especially due to the high ecological and economic value of the Greater Yellowstone Ecosystem. However, we are concerned with the design of the purpose and need of the project and some of the alternatives under consideration. All alternatives need to address reducing risks to both motorists and wildlife.

We note that the Purpose and Need statements include some, but not other, alternatives. For example, the “Driver Safety” section states, “The Plan identified the need to improve safety of US 20 by adding passing lanes and other intersection improvements,” and, “by widening the road shoulder.” These solutions are two of a suite of potential alternatives that address the purpose and need. A project’s purpose and need cannot be defined so narrowly so as to eliminate the analysis of other reasonable alternatives. For example, reduced speeds and the construction of wildlife overpasses and underpasses are reasonable alternatives that also address the purpose and need. The EA should remove specific alternatives from the purpose and need statement and list the full suite of reasonable solutions in the alternatives section.

The analysis should be clearer about the goal of enhancing wildlife movement between Yellowstone National Park, the Yellowstone Highlands and the Beaverhead Mountains. We recommend that this goal be incorporated into the overall purpose and need. We note that this goal can be accomplished by a number of measures. The analysis should also incorporate the findings of the State Wildlife Action Plan (SWAP) ¹ that identifies threats for Species of Greatest Conservation Need and recommends actions to mitigate those threats. For example, the SWAP recommends utilizing “over- and under-passes” among other actions.

We believe that reducing speed limits and increasing enforcement is one of the least expensive alternatives which would increase safety and minimize impacts to wildlife and should be considered in the range of alternatives.

Other considerations that need to be adequately highlighted in the analysis include the significance of wildlife movement into and out of Yellowstone National Park, including the local economic benefits from the wildlife-related tourism industry. The analysis should also factor in the connectivity with other core wildlife areas in central Idaho. Other trends to examine include how climate change may increase the need for wildlife to migrate and expected motorized use along this highway.

Even with the best plans in place, wildlife collisions are likely to continue to occur to some extent. The project should also address mitigation measures for these wildlife losses. Mitigation measures may include reducing the road densities in other areas. Mitigation measures should not be voluntary and should be incorporated in all alternatives.

Please keep us on the mailing list for this project and all other Idaho Transportation Department Projects.

On behalf of the National Parks Conservation Association (NPCA), I appreciate the opportunity to submit comments specific to the Idaho Transportation Department’s (ITD) Targhee Pass Environmental Assessment (EA) for the Reconstruction U.S. Highway 20.

NPCA was established in 1919 to protect and enhance America’s national park system for present and future generations. NPCA gives voice to those who support the national parks with over 1.3 million members and supporters including 4,500 in Idaho. NPCA has a long history of advocating for the protection of national parks and park resources, both inside national parks and on adjacent lands. We are particularly interested in the potential impact the proposed project could have on the wildlife that moves between Yellowstone National Park (YELL) and the broader Greater Yellowstone Ecosystem.

We appreciate ITD’s efforts to-date to engage with stakeholders, collaboratively identify needs for wildlife and wildlife-vehicle-collision mitigation on Targhee Pass, and provide opportunities for public participation during this process.

In addition to the scoping comments submitted on 1/30/2017, NPCA would like to raise the following additional concerns in regards to the Purpose and Needs section of the EA as currently identified by ITD. Required as part of the EA process, the Purpose and Need section should “[explain] the reason the agency is proposing the action and what the agency expects to achieve.”

The Purpose and Need section should consist of “a clear statement of the objectives that the proposed action is intended to achieve.” However, in the Purpose and Need statement for the Targhee Pass EA, ITD states: “The Plan identified the need to improve safety of US 20 by adding passing lanes and other intersection improvements (emphasis added).” A second need states: “The existing road shoulders do not meet current design standards nor do they meet the recommendations of the Plan. Certain types of vehicle crashes will be reduced by widening the road shoulders (emphasis added).”

As currently written, the Purpose and Needs statement appears predecisional. By prescribing specific solutions, the EA does not comply with the intent of the National Environmental Policy Act. Purpose and Need statements should guide the evaluation of a range of feasible alternatives including a No Action alternative. NPCA believes that ITD is preemptively selecting solutions before presenting the Draft Alternatives. It appears that ITD is not considering all reasonable alternatives in the draft alternative development phase. There are other potential solutions that should be given equal consideration such as slower speeds or installing wildlife crossing structures. NPCA recommends that ITD remove potential solutions from the Purpose and Needs statements to ensure that all potential solutions are considered.

In addition, the Purpose and Needs statement does not reference wildlife movement, but ITD does identify it in the “goals and objectives” section. Unlike the Purpose and Need portion, the “goals and objectives” are not a formal part of the NEPA review process and therefore do not have to be considered or incorporated into draft alternatives. NPCA recommends that ITD modify the Purpose and Needs section to include the need to enhance wildlife movement across U.S. 20 within the project area.

We appreciate the opportunity to provide input during this comment period and look forward to continuing to work with ITD to identify opportunities to improve public safety and wildlife habitat connectivity.

1 https://www.epa.gov/nepa/national-environmental-policy-act-review-process
2 http://environment.transportation.org/pdf/programs/PG07.pdf
On behalf of the Greater Yellowstone Coalition (GYC) and the Yellowstone to Yukon Conservation Initiative (Y2Y) please accept the following comments on the Idaho Transportation Department’s (ITD) Targhee Pass Environmental Assessment (EA) that proposes to reconstruct four miles of US 20 with a truck climbing lane from the junction of SH 87 to the Montana state line between milepost 401.5 and milepost 406.3 near Island Park in Fremont County, ID.

The Greater Yellowstone Coalition is a regional conservation organization based in Bozeman, MT with offices in Idaho and Wyoming and over 95,000 supporters from across the country. Our mission is to work with people to protect the lands, waters and wildlife of the Greater Yellowstone Ecosystem (GYE), now and for future generations. Our members include residents living in eastern Idaho including Fremont County and Island Park, southwest Montana including the Madison Valley and West Yellowstone as well as visitors enjoying the GYE. GYC works to with diverse stakeholders to ensure the lands and wildlife of the GYE are protected and managed for healthy, functioning ecosystem. This includes transportation projects that have the ability to alter wildlife habitat and populations.

The Yellowstone to Yukon Conservation Initiative is a transboundary conservation organization with offices in Canmore, Alberta and Driggs, Idaho. Our mission is to protect and connect habitat from Yellowstone to Yukon so people and nature can thrive. We are the only organization dedicated to securing the long-term ecological health of this entire region. We take a scientific and collaborative approach to conservation, and highlight and focus on local issues that affect the region. We have worked with more than 300 partners, including scientists, conservation groups, landowners, businesses, government agencies as well as First Nations and Native American communities to protect this landscape.

**Public Input**

We commend ITD’s efforts to engage the public on the Targhee Pass project. The planning and technical processes conducted by ITD through corridor planning and projects within a corridor is not an easy process for the public to navigate. The National Environmental Protection Act (NEPA) process adds an additional layer of challenge to seek public input. However, these processes are critical to public engagement and the purpose of NEPA to “encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation...”. Clearly, the Targhee Pass project is important to the residents and visitors of Island Park as indicated through the public’s participation in the public meetings for Targhee Pass in December 2016 and July 2017 as well as the public discourse regarding Targhee Pass in local and social media outlets.

Specifically, we commend ITD for addressing wildlife issues in the public meetings through the displays of wildlife maps, including the various reports and studies of wildlife that will be impacted by the Targhee Pass project and working with Idaho Fish and Game to hire staff to advise ITD on wildlife issues in this critical area.

In addition, we commend ITD for slowing the public process by delaying an April 2017 public meeting to July 2017 to ensure meaningful public participation, forming a Targhee Pass Stakeholder Working Group (SWG) and creating a website for the public that includes information about the environmental and
public processes as well as visual materials displaying key issues such as wildlife. We question, however, the adequacy of time to incorporate the public’s comments within the draft alternatives. The public meeting held on July 27, 2017, with comments due for draft alternatives on August 10, 2017, does not allow much time for the public’s comments to be incorporated in to the draft alternatives before they are presented to the public on August 30, 2017. We certainly hope the public engagement this summer is not simply a formality and that the public’s consistent comments, particularly as it relates to wildlife, are incorporated in the draft alternatives.

**Purpose and Need**

The Purpose and Need for the Targhee Pass Project, as identified and proposed on the Targhee Pass EA Website\(^1\), are:

**Project Purpose:**

The purpose of the proposed project is to improve driver safety, traffic flow, and roadway structural integrity of US 20 between the Junction of SH 87 and the Montana state line, also known as Targhee Pass.

**Project Needs:**

The need for this project is partially documented in the US 20 Corridor Plan (Plan) that was approved by the Idaho Transportation Board in 2006 and by more recent technical reviews by transportation subject matter experts including traffic, geo-technical, wildlife, and pavement maintenance engineers. Specific needs supporting improvement to this portion of US 20 are:

**Driver Safety**

- The Plan identified the need to improve safety of US 20 by adding passing lanes and other intersection improvements.
- The existing road shoulders do not meet current design standards nor do they meet the recommendations of the Plan. Certain types of vehicle crashes will be reduced by widening the road shoulders.
- Current traffic volumes warrant modification of the traffic flow at the Big Horn Hills Estates entrances and at the Howard Springs pull-out.
- Forest canopy shading causes road icing in certain locations reducing safety.
- Blowing and drifting snow contributes to vehicle crashes in the winter.
- Wildlife-vehicle collisions (WVC) contributed to 10 percent of recorded vehicle crashes on US 20 between Chester and the Montana state line from 2009 to 2014 (Kittleson, 2014).

**Traffic Flow**

- Traffic flow is hindered at times by congestion and slower moving vehicles climbing Targhee Pass. Construction of a climbing lane is warranted.
- The Plan identified the need to improve traffic flow on US 20 by adding passing lanes and intersection improvements.

**Roadway Structure**
- Roadway pavement and foundation age exceed the expected life cycle of 40 years. Poor drainage creates soft spots and allows frost heaving of the road during the winter. Recent investigations show the aged road foundation is not suitable for long term pavement stability.

Following the Purpose and Need statements are two “Goals and Objectives,” which list “improving safety for pedestrians and bicycles within the project area,” and “enhancing wildlife movement across US 20 within the project area. Wildlife movement across US 20 is a safety issue for both drivers and wildlife and can impede migratory, dispersal, and daily movements of wildlife (Clevenger and Huijser, 2011).”

While the Purpose and Need statements have improved since they were originally presented to the public in December 2016, they fall short in two primary areas.

First, the Purpose and Need statements are not the appropriate place to list possible alternatives or solutions. The first bullet under “Driver Safety” states “The Plan identified the need to improve safety of US 20 by adding passing lanes and other intersection improvements,” and the second bullet, “by widening the road shoulder.” The Plan has identified adding passing lanes as a possible solution, but other “more recent technical reviews” referred to in the Need identify other solutions that are not identified in the Need, such as slowing speeds and providing wildlife overpasses and underpasses. **We request that ITD remove these possible solutions from the Need to adequately consider all possible alternatives, including a “No Action” alternative.**

Further, the Needs statement references the existing 2006 Corridor Plan and “technical reviews by transportation subject matter experts including traffic, geo-technical, wildlife, and pavement maintenance engineers,” and notes that “Specific needs supporting improvement to this portion of US 20 are: (driver safety, traffic flow, and roadway structure).” The Need is inclusive of all of the studies that have recently been completed to help inform ITD’s decisions to make US 20 a safer road, except the needs identified in the 2016 “Safety Solutions for Wildlife-Vehicle Collisions on Idaho’s US 20 and SH 87” report completed by Dr. Patricia Cramer for ITD. ² Enhancing wildlife movement is listed as a “goal and objective,” which is not a formal term in the NEPA process, nor does it have to be met by EA alternatives.

We recognize ITD has recently made significant strides toward addressing wildlife connectivity in the EA process, but listing animal movement as a goal or objective without integrating it into the Need might easily lead to ITD “addressing” the issue in public meetings while still presenting or choosing alternatives that will continue to reduce wildlife habitat permeability adjacent to Yellowstone National Park.

The important landscapes affected by Targhee Pass are described by Idaho Fish and Game as the Yellowstone Highlands and the Beaverhead Mountains in the State Wildlife Action Plan (SWAP). ³ The SWAP identifies priority threats for Species of Greatest Conservation Need and strategies and conservation actions to mitigate those threats. The SWAP recommends the implementation of wildlife crossing structures in the form of either the “construction of over- and under-passes” or the “incorporation of best practices for wildlife crossing into highway planning and construction.” Neither of these are addressed in the Purpose and Need as written. We request that the Project Purpose be broadened to include language that is consistent with Idaho Department of Fish and Game’s State
Wildlife Action Plan, specifically to provide protection and enhancement of terrestrial and aquatic habitat connectivity for the Species of Greatest Conservation Need (Tier 1 species include grizzly bear and wolverine) along with elk, moose, deer, Yellowstone cutthroat trout, and other native species within the project area.

While the Project Needs touch on animal collisions as a safety problem and community issue, it currently lacks the scope, context, and intent that reflect the importance of fish and wildlife as a regional and national natural and economic resource. As stated in our previous letter dated January 30, 2017, ITD’s iPlan website for the US Corridor Plan recognizes that:

> “Vehicle collisions with wildlife are the second most frequently reported cause of accidents along the corridor, a problem which merits considerable attention considering the threat posed to both the humans involved in such accidents and the biological resources threatened by the road hazard.”

Additionally, in 2016, ITD hired road ecologist Dr. Patricia Cramer to complete an assessment of US 20 safe wildlife passage alternatives along US 20 and SH 87. Dr. Cramer’s recent study Safety Solutions for Wildlife-Vehicle Collisions on Idaho’s US 20 and SH 87 identifies Targhee Pass as having the highest wildlife vehicle collision crashes per mile per year of any of the sections on US 20, at .85 WVC/mi/yr. Between 2010 and 2014, there were 17 reported wildlife vehicle collisions in this section of road, and in September 2015 (Cramer, 2016), a sub-adult grizzly bear was killed on Targhee Pass, as a number of cars ran over the bear.

Cramer also states that:

> “This area is of the greatest wildlife connectivity value of any stretch of US 20 due to how it bisects wildlife movements into and out of Yellowstone National Park and large scale regional movements of carnivores such as grizzly bear and wolverine as they move to and from other ecosystems to the east and west, southwest and southeast. Thus the animals in this area are of greater potential danger for (wildlife vehicle collisions) as are the humans traveling this section of road.”

And just last week on August 4, 2017, a truck with four passengers struck a bison at night, rolled multiple times, and hit a power pole. The truck was enveloped in roll bars, which surely helped prevent worse injuries to the driver and passengers. Had this bison been hit by a conventional car, the accident most likely would have been fatal.

Increasing traffic in to and out of Yellowstone National Park on US 20 will result in more wildlife losses potentially altering wildlife migrations in the Yellowstone region. The Environmental Study infers that increasing traffic along US 20 will cause congestion and safety problems, which justifies the widening and straightening of Targhee Pass. These proposed solutions, however, will most likely have a dramatic negative effect on local wildlife survival and migration patterns.

Studies show that traffic volumes of more than 2500 annual average daily traffic volume (AADT) dramatically increase the number of wildlife mortalities due to wildlife vehicle collisions, repel animals
from crossing near busy roads, and impede safe wildlife crossings on highways. Similarly, numerous studies show that the operating speed of a highway is one of the most significant predictors of wildlife-vehicle collisions, as it significantly reduces the driver’s reaction time compared with reaction times at slower speeds. Other studies similarly indicate that road improvements, including straightening out curves, increasing lane and shoulder widths and paving gravel surfaces, are associated with an increase in wildlife-vehicle collisions.

As requested in our January 2017 letter, we request that the Project Needs are expanded to include:

- The project’s unique and significant geographic location to reflect its proximity to Yellowstone National Park, specifically noting the need to protect economic and cultural benefits of wildlife viewing, hunting and fishing within the Greater Yellowstone Ecosystem
- The need to protect the historical and cultural importance of the Nez Perce (Nee-Me-Poo) National Historic Trail and other cultural resources of importance to the Nez Perce and Shoshone-Bannock Tribes
- The need to provide safe wildlife passage between Yellowstone National Park and the Salmon-Selway-Bitterroot Wildlands Complex in central Idaho
- The need to protect terrestrial and aquatic habitat quality and connectivity for the survival and long-term health of fish and wildlife in the area
- The need to mitigate the deleterious impact to wildlife populations and their ability to naturally move and migrate along this stretch of road at the current and forecasted traffic volumes, road width, and speed, and
- The need to reduce the likelihood of wildlife vehicle collisions at current and future traffic projections to protect Tier 1 Species of Greatest Conservation Need and maintain connectivity along important migration and movement routes as established by mule deer, elk and moose in the area that are already bisected by US 20.

**Proposed Alternatives**

The Wildlife Crossings Structure Handbook (US Department of Transportation, 2011) describes planning alternatives for safe wildlife passage in three ways – 1) avoiding critical wildlife habitat, 2) mitigating affected wildlife populations, or 3) compensating for the loss of wildlife habitat. Although it is too late to fully avoid US 20 bisecting critical habitat for wildlife like wolves, elk, moose, bear, and bison moving in and out of Yellowstone National Park, it is possible to create alternatives in the Environmental Assessment that will meet the needs of ITD and the ecosystem to mitigate affected wildlife populations and/or compensate for habitat loss.

**We request that ITD avoids additional fragmentation of critical habitat and prevents permanent habitat loss by providing adequate wildlife mitigations in every alternative for Targhee Pass as you move through the Environmental Assessment process.**

Below are recommendations from local residents to professional road ecologists as well as recommendations by Dr. Cramer in a study commissioned by ITD that should be included in the range of alternatives for the Targhee Pass EA.
Reducing speeds and rerouting truck traffic

Over the last two years, GYC and Y2Y have met with many members of the public, road ecologists, wildlife biologists, and ITD. We collected dozens of cards with comments from the public on US 20 since the EA process began in 2016. The most common request from the public is for ITD to slow the speeds.

Reducing speed limits and increasing enforcement is one of the least expensive alternatives to increase safety and minimize impacts to wildlife. This will require ITD to not design roads that encourage higher speeds through widening and straightening and work with Fremont County to enforce speed limits. This option could go hand in glove with requests from other groups like the Citizens Road Alliance to route truck traffic from US 20 back to I-15.¹²

Maintain two-lanes with one overpass

Another alternative supported by some include an option NOT to expand US 20 on Targhee Pass, but instead to fix the road, build one overpass located north of Big Horn Estates on Caribou-Targhee National Forest property, and to install the appropriate fencing around one overpass.

Wildlife Mitigations from Cramer 2016 Report

Using local wildlife data, modeling, and crash and carcass data, Dr. Cramer prioritized the Targhee Pass section of US 20 among the most important for wildlife mitigations. The report suggests three wildlife overpasses between mile markers 402 and 406 – one south of Big Horn Estates, one tunnel north of Big Horn Estates, and one near the top of the Continental Divide at the Montana state line. All of these overpasses would require significant fencing to the junction with SH 87 to the state line to keep animals off the road and to funnel them toward overpasses. The southernmost wildlife overpass recommended in the report is also the site where a bison was hit last week.

Recreation Considerations

It is also imperative that ITD consider the motorized use, particularly in the winter, on Targhee Pass. We also suggest that alternatives contain solutions to keep recreational use separate from wildlife use, possible resulting in underpasses similar to those found on Togwotee Pass in western Wyoming.

Conclusions

In conclusion, GYC and Y2Y request that:

1. Solutions not be addressed in the Purpose and Need.
2. Needs identified in all of the recent studies completed by ITD be incorporated into the Purpose and Need statement for Targhee Pass specifically safe wildlife passage.
3. Recommendations from IDFG’s SWAP be integrated into the Purpose and Need, and be considered in each proposed alternative.
4. Proposed alternatives include mitigations for wildlife, specifically reduced speed limits and wildlife underpasses and overpasses to reduce fragmentation and enhance wildlife movement and permeability across US 20.
We firmly believe that providing safe wildlife passage on Targhee Pass is the best decision for Idaho’s roads, wildlife, visitors, and residents, especially in light of forecasted increases in traffic. Thank you for considering our comments. Please contact any of us if you have any questions.

4 Rinaldi, Kathy, (Greater Yellowstone Coalition), Trotter, Kim, (Yellowstone to Yukon Conservation Initiative).
Letter to Targhee Pass Study Team, Idaho Transportation Department’s Targhee Pass expansion project on US-20.
Wildlife crossings are important. I immediately understand the need and benefits of providing safe passage for wildlife. The highway is a deadly barrier that they can't safely navigate.

I'm concerned with humans and human recreation. As a mountain bike rider, I've become somewhat familiar with the trails in the Henrys Lake Mountains. One loop of trails that is often traveled is the CDT (Continental Divide National Scenic Trail) over Lionhead Mountain combined with trails on either fork of Targhee Creek. These trails form loops of 20 and 27 miles respectively, a big days adventure. The flaw in this otherwise spectacular outdoor experience is the poor route connecting Targhee Creek trailhead with Targhee Pass. Any recreation travel connecting these two locations must pass along the powerline road, which plummets in and out of a steep ravine, or along the very narrow dangerous highway shoulders. Currently this isn't a safe or practical situation.

New wildlife crossings should account for safe passage of humans on foot, horse, bicycle, snowmobile, and motorcycle along the highway edge and under the wildlife crossings. Or alternatively, a preferred solution would be to construct a recreational trail roughly between the highway and the powerline, connecting the Targhee trailhead to Targhee Pass. The land along this short route is somewhat gentle and could easily accommodate a sustainable recreational connector trail for all the allowed uses. Creating the trail would have the affect of reducing the required span for the wildlife crossing structures. The trail would also give a preferred option so people wouldn't need or be tempted to get on the highway.

For hikers, horse riders, and bicycle riders traveling north and south along the CDT, a human trail over the highway along the wildlife crossing must be provided. Currently all humans are at risk of accidents as they try to cross the highway between the speeding vehicles. It's a highly dangerous situation that should be corrected as a component of this project.

NEPA/CEQA PROJECT SCOPING QUESTIONS

PROPOSED PROJECT: Building three wildlife overpass structures on Hwy 20 at Targhee Pass. The intended future objective is declaring a migratory corridor for Elk, with possible other
corridor declarations, for the purpose of connecting the land to Yellowstone National Park. Furthermore, it is possible the intention of the US Forest Service at this pass is to promote an overlay of corridor protection that will achieve the objectives of initiatives such as the Heart of the Rockies, Yellowstone to Yukon, High Divide, and Crown of the Continent.

1. PROJECT WETLANDS AND RIPARIAN AREAS

1.1 In contemplating three overpass at Targhee Pass has any consideration been given to the effect it will have on the drainage, streams, creeks, or other riparian systems on or near this project site?

1.2 Are any of these three overpasses located within a wetland or riparian area designated on a National Wetlands Inventory map of the Department of Interior (DOI)?

1.3 Does the project comply with Executive Order (E.O.) 11990, Protection of Wetlands, which discourages federal funding of new construction or filling in wetlands and compliance is required with the wetlands decision-making process (§ 55.20 of 24 CFR Part 55). The applicant should use Part 55 published in the Federal Register on January 1, 1990 for wetland procedures).

1.4 4-5 miles south of Targhee Pass is the actual location where Elk and other wildlife cross Hwy 20. At this site, a wetland is located on the westside on private property. What provisions will be made for the Elk in place of this wetland which they use currently during their migration?

1.5 Private land and the Big Horn Hill Estates are located on the eastside. Given that wetlands are protected, what protections are anticipated regarding the three proposed overpasses?

1.6 What anticipated effects would three wildlife overpasses in this area have on existing private property wells and septic systems?

1.7 What consideration has been given to the damaging effects three overpasses would have on the riparian areas at Targhee Pass?

2. FLOOD MANAGEMENT

2.1 Are any of these three overpasses within a floodplain designated on a current FEMA flood map? (24 CFR Part 55).

2.2 Is the proposed overpasses footprint located in a Special Flood Hazard Area identified on a current Flood Insurance Rate Map (FIRM)?

3. HISTORIC PRESERVATION

3.1 Has the Island Park Historical Society been notified of the project and requested to provide comments?

3.2 Is the affected property listed on or eligible for listing on the National Register of Historic Places?
| 3.3 | Are any of the three overpasses located within or directly adjacent to an historic district? |
| 3.4 | Do the overpass areas potentially effect historic districts or property? |
| 3.5 | Has the Tribal history in and around Targhee Pass area been considered and the impact three overpasses would have in disturbing these sites? |
| 3.6 | Of the Tribes who have a historical connection to the proposed land including but not limited to the Nez Perce, Flathead, and Bannock, what Tribes have been contacted, what comments were submitted, and how has that information been included in the NEPA process for this proposed action? |
| 3.7 | What studies have been conducted to determine what historical artifacts remain in the Targhee Pass area at the proposed site? |
| 3.8 | Pioneer Cemetery is located on private land at the Hwy 87 junction. Targhee Cemetery, having been instituted around 1900, is located on the Salisbury Ranch, and rests on the banks of Targhee Creek. What consideration has been given for the protection of these cemeteries which hold historical value to the Island Park community to ensure their preservation, especially if it is the intention to divert Elk to overpasses and thus altering their migratory path? |
| 3.9 | Which Tribes have supported the building of three overpasses at Targhee Pass? |

4. **NOISE ABATEMENT**

| 4.1 | What studies have been conducted on the potential noise effects of three overpasses from the local airplane landing strip and highways such as Hwy 20 and 87? |
| 4.2 | Would three overpasses comply with 24 CFR 51, Subpart B that requires a Noise Assessment for proposed new construction? |
| 4.3 | Has a noise contours map been developed for three proposed overpasses and does it show Day-night average sound level (abbreviated as DNL)? |
| 4.4 | What procedures or guidelines will be developed that allows community members or adjacent property owners to formally complain about inordinate or unanticipated noise from three overpasses? |

5. **PROJECT RELATED HAZARDS**

| 5.1 | Has the site been studied for a potential increase in invasive species which have been known to occur in wildlife overpasses? |
| 5.2 | If the site has not currently been studied for this as described in 5.1 above, should it be? If not, why? |
| 5.3 | Would three overpasses include a full inventory and assessment of all potential invasive species? |
5.4 Have the overpass sites been studied for a potential increase in predatory activity which have been known to occur in wildlife overpasses?

5.5 Studies have shown that there is increased predator activity on the fringes of protected areas such as Yellowstone National Park and with a concentrated area of prey. What studies have been conducted regarding this and if not conducted, why? Are there any intentions to study this issue?

5.6 The spread of brucellosis by Bison is currently a concern, especially to the cattle in the Island Park area. What studies have been conducted regarding the potential spread of this disease with concentrated Elk in three, small defined areas required for overpasses?

5.7 What studies have been conducted for the potential transmission of brucellosis to humans from Elk who have been infected?

5.8 In the event Elk are infected with brucellosis as a result of more confined migration, what action would ITD intend to take?

5.9 Elk are migratory in this area only during the spring and fall. What consideration has ITD given to significantly disrupting the landscape for 20 days out of the year? What other alternatives have been studied for Targhee Pass during these times of migration that do not involve such disruption of the land?

6. AIRPORT HAZARDS

6.1 Are the three overpasses within 3,000 feet from the end of an air strip runway?

7. WATER

7.1 Will the three overpasses affect a sole source or other aquifer?

7.2 What is the total anticipated impervious surface coverage estimated for the three overpasses?

7.3 What percentage of the project site is proposed for impervious surface, and how does this surface impact existing elements addressed in Section 1 above?

7.4 Does the proposed overpass sites currently serve as water supply to local landowners?

7.5 What mitigations are proposed for water supplies at Targhee Pass that will not affect or ameliorate water supplies of adjacent residential neighborhoods businesses, and other land uses currently receiving adequate water?

7.6 How will ITD assure the local government and surrounding community that costs associated with an altered water supply as a result of three overpasses will be fully accommodated, and not a burden imposed upon local governments, local water districts or providers, or local property owners?

8. SEWER, SANITATION AND WASTE DISPOSAL
8.1 Are there currently any septic tanks at the three overpass sites?

8.2 How will current waste water disposal systems be impacted by three overpasses, and at what cost?

8.3 What additional wastewater disposal systems would be required and how will building three overpasses impact existing and connecting infrastructure in terms of capacity and annual cost?

8.4 If the water supply is non-municipal, has an acceptable "system" been considered?

9. ENVIRONMENTAL JUSTICE

9.1 Are the three overpasses located in a predominantly minority or low-income neighborhood?

9.2 Do the three overpasses or neighborhood suffer from disproportionately adverse environmental effects on minority and low-income populations relative to the community-at-large?

10. UNIQUE NATURAL FEATURES AND AREAS

10.1 Are the three overpasses near natural features (i.e., bluffs or cliffs) or near public or private scenic areas? If so, what site and construction adjustments would be considered to protect scenic viewsheds or other public entitlements?

10.2 Are other natural resources visible at Targhee Pass or in the vicinity? Will any such resources be adversely affected or will they adversely affect the project?

10.3 A wildlife overpass would significantly alter the natural integrity of the landscape and historical integrity, and view as it is now. How does ITD intend to offset or mitigate this natural landscape disruption and current view?

11. SITE SUITABILITY

11.1 What residual impacts will occur with three overpasses at Targhee Pass?

11.2 What impact will fencing have in the area on private land and for other wildlife? If studies have not been conducted on this, why, and when will studies be conducted?

11.3 Are there unusual conditions on the site that three overpasses will affect?

11.4 Is there any indication of currently distressed vegetation at the proposed site for three overpasses?

11.6 Are there pools of liquid or soil staining, chemical spills, abandoned machinery, cars, refrigerators, etc. at any of the three proposed overpass sites?

11.7 Are there existing or abandoned transformers, fill/vent pipes, pipelines, drainage structures at any of the three proposed overpass sites?
11.8 Are the three proposed overpass sites compatible with surrounding areas in terms of:

11.8.1 Land use
11.8.2 Residential type (low/high-rise)
11.8.3 Residential density

11.9 Will the proposed three overpasses influence or be unduly influenced by:

11.9.1 Postponed maintenance
11.9.2 Transition of land uses
11.9.3 Incompatible land uses
11.9.4 Fencing

11.10 The Fall River rural electric powerline and Fremont Communications fiber runs along the westside of Hwy 20, the poles being located on private land.

11.10.1 What studies will be conducted to determine if any of these lines will need to be moved with three overpasses?

11.10.2 Have the private property owners been contacted regarding the possibility that their land may be affected if the lines need to be moved? If not, why?

11.10.3 If it is determined the lines will need to be moved who would be responsible for the costs?

11.10.4 What would the cost be to move these lines?

11.10.5 If the lines have to be moved what plans will be made to ensure there will be no disruption of service to customers?

11.11 Fencing will require hazing Elk to use overpasses. What studies have been reviewed showing the effect of this on Elk? Who will be responsible for this activity and what agency will be responsible for the cost?

11.12 What agency will be responsible for the ongoing maintenance, repair, and replacement of fencing?

11.13 What private landowners have been contacted regarding either the disruption of their land or intention to use fencing on their land? If they have not been contacted what is the plan for contacting them?

11.14 During the winter snow can be 10-17 feet high. What studies have been conducted or provisions considered for addressing this if three overpasses are built?

11.15 Cutting the trees lines back to address the problem of snow drifting and wildlife crossings has been successful in other areas of Island Park. What rationale is being used to not do the same at Targhee Pass rather than building three overpasses?

12. AIR QUALITY

12.1 Will three overpasses have an effect on nuisance odors?
12.2 What mitigations are proposed for possible nuisance odors?

13. SOIL CONDITION, QUALITY, STABILITY, EROSION AND DRAINAGE

13.1 Describe the site elevations and any accommodations required for significant slopes.

13.2 Is there evidence of slope erosion or unstable slope conditions on or near the three overpass sites?

13.3 Is there any evidence of potential soil problems such as cracking or resettling of foundations in residential areas from three overpasses?

13.4 Have soil reports or studies or borings been made for the three proposed overpass sites? If so, what are the findings of soil studies accomplished?

13.5 Is there indication of cross-lot runoff, swales, drainage flows on property?

13.6 Are there visual indications of filled ground? What assurances has ITD developed to ensure soil stability for construction footprint and impervious surfaces?

13.7 Are there active rills and gullies at the three proposed overpass sites?

13.8 Have structural borings or dynamic soil analysis been requested in association with geological studies?

14. NUISANCE AND HAZARDS

14.1 Will any of the three overpasses be affected by seismic faults, or fractures?

14.2 Will any of the three overpasses be affected by wind/snowstorm concerns?

14.3 Will any of the three overpasses be impacted by poisonous plants, insects or animals onsite?

14.4 Are there unprotected water bodies located at the three overpass sites?

14.5 Are there other hazardous terrain features at any of the three proposed overpass sites?

15. ROADS TRAFFIC AND TRANSPORTATION

15.1 Has a traffic study been conducted for the proposed project that is specific to the three overpass sites, and not just generic to Targhee Pass?

15.2 Has a traffic study accommodated existing traffic counts experienced at the proposed overpass sites, and then projected appropriate increased traffic counts based upon days of the week, hours of the day or night, during tourist season, and during migratory periods?
15.3 Has a traffic study calculated existing road maintenance requirements with anticipated road maintenance with three overpasses? What are project costs associated with three overpasses?

15.4 What is the projected weekly, daily and hourly traffic count for the three sites, and how does this translate to an annual traffic increase that impacts adjacent properties and neighborhoods?

15.5 What is the projected weekly, daily and hourly traffic counts for the site specifically during the highest migratory times in the spring and fall?

15.6 What mitigations are proposed to accommodate traffic generated by the proposed overpasses with existing traffic counts and flows at and adjacent to the three overpasses?

15.7 Will three overpasses affect or be affected by ingress and egress streets?

15.8 Will three overpasses affect or be affected by dangerous intersections?

15.9 What mitigations (i.e. traffic signals, signs) are proposed to ameliorate traffic changes and activity associated with three overpasses? What is this cost and how will it be accommodated without affecting costs of adjacent local governments?

15.10 What are the proposed mitigations for biking and pedestrian pathways at or near the vicinity of three overpasses, and what mitigations does the applicant propose to ensure the safety and non-interference of use of these public pathways?

15.11 How will ITD ensure that increased capacity needs of possible future transportation will be accommodated at the sole expense of ITD and not the local governments?

15.12 Will private transportation systems be required and/or implemented in association with three overpasses?

16. CHILDREN, SCHOOLS, PARKS, AND RECREATION

16.1 What is the proximity of public schools to the project site?

16.2 Are there usual and customary children's play areas within the vicinity of the three overpasses?

16.3 Do public school buses travel the road systems associated with the three overpasses, and if so, how will traffic mitigations proposed by ITD ensure safe and timely schedules for public school transportation needs?

16.4 Are there usual and customary recreational areas in the vicinity of the three overpass sites that are currently utilized by the adjacent community, and if so, how will the users of these recreation areas be affected by overpasses?

16.5 What studies have been conducted on the recreational use of Targhee Pass?
## 17. LIGHT AND GLARE

17.1 How will ITD assess project site light and glare with three overpasses?

17.2 What mitigations will ensure that onsite and offsite light and glare will comport with adjacent local government light, glare and signage requirements?

17.3 What procedures are proposed for adjacent neighbors who wish to legitimately complain of excessive light or glare from three overpasses?

## 18. COMMERCIAL AND/OR RETAIL ANCILLARY USES

18.1 Please identify how each and every commercial site near three overpasses might be affected currently and over the next ten (10) years.

## 19. HOUSING & OVERNIGHT TOURIST ACCOMMODATIONS

19.1 Has ITD studied the current housing stock and occupancy rates of adjacent communities? If so, what will the workforce be impacted by three overpasses?

19.1.1 Local community housing needs, projected over the next ten years.

19.1.2 Local housing sales and rental rates, projected over the next ten years.

19.1.3 Local housing over-crowding and code enforcement conditions that might impact adjacent communities, projected over the next ten years.

19.2 How will ITD contribute to a stable and affordable housing stock supply consistent with the ITDs proposed workforce housing needs?

19.3 How will three overpasses impact existing hotels, motels, RV facilities and other overnight tourism lodging facilities?

## 20. LOCAL ECONOMIC IMPACTS

20.1 What nationally accepted professional or scholarly data is the applicant using to evaluate the impact upon the Island Park tourism industry and the potential income loss to adjacent commercial, retail, restaurant, recreational and lodging facilities, over the next ten years?

20.2 Please describe whether or how ITD proposes to hire a local workforce, and how this potential transition of workers from current employment to future employment with ITD might impact the local workforce?

20.3 Does ITD anticipate hiring a workforce from outside of the immediate community? If so, from what sources will ITD recruit its workforce?

## 21. LAW ENFORCEMENT, CRIME AND PUBLIC SAFETY

21.1 How will activity with three overpasses impact resources of local, county and state law enforcement, over a projected ten-year period?
21.2  What law enforcement and public safety plans have been developed for three proposed overpasses that will be commensurate with area law enforcement and public safety needs, projected over a ten year period?

21.3  What cost mitigations is the applicant proposing to offset impacted and increased law enforcement personnel needs of agencies serving three overpasses?

21.4  What nationally accepted professional or scholarly data is ITD using to evaluate the impact of potential crimes such as poaching or crimes traditionally associated with wildlife?

21.5  What mitigations in terms of personnel, monitoring systems, or other methods is ITD proposing to minimize the impact of anticipated crime associated with Elk and other wildlife?

22.  ALTERNATIVE SITE ANALYSIS

22.1  Please identify by assessor parcel number or location, each and all sites considered by ITD, prior to selecting Targhee Pass as the preferred site.

22.2  For each alternative site identified in Question 22.1 above, please describe the level of analysis conducted, and explain why those sites were rejected, in preference for Targhee Pass. Was Targhee Pass selected due to its proximity to Yellowstone Park and advancement of connectivity?

22.3  For each alternative site considered and discussed in Question 22.2 above, please identify the process and professionals that made determinations that have ultimately assessed Targhee Pass as the environmentally preferred site. What professionals are being used who are unbiased towards overpasses and are more objective in the use of other alternatives?

23.  COOPERATION OF LOCAL GOVERNMENT

23.1  Please provide documentation of all meeting minutes and communications with Fremont County Commissioners regarding this proposed action.

23.2  Please provide documentation of all meeting minutes and communications with the Island Park City Council.

23.3  How many meetings were conducted with the Fremont County Commissioners and Island Park City Council regarding three overpasses at Targhee Pass?

23.4  What was the agenda and topic of conversation with the Fremont County Commissioners and Island Park City Council members regarding overpasses and Targhee Pass?

24.  TRIBES

24.1  What Tribes were contacted regarding three overpasses at Targhee Pass?
24.2 How many meetings were held with the affected Tribes at Targhee Pass?

24.3 What studies have been conducted to determine if Targhee Pass has significant historical Tribal value?

24.4 What comments, if any, did the involved Tribes submit?

24.5 There is historical value at Targhee Pass.
1840 - The Flathead Tribe traveled through Island Park to Pierre’s Hole to meet with Father DeSmet. It is known that they then traveled back to Island Park, camping at Henry’s Lake. This is validated by a rock that was later discovered and inscribed with “July 23, 1840 DeSmet”. Given the Tribe was 1600 in strength it is apparent Targhee Pass would have been part of this journey.

1877 – Chief Joseph of the Nez Perce Tribe led his Tribe on a ‘flight for life’ from the U.S. Army under the command of General O.O.Howard. General Howard intercepted the Nez Perce in Island Park at Targhee Pass, having set up a barricade. The Flying R Ranch has testimony available to this fact. Later, the Bannock Tribe was involved as guides, schouts, and messegners. Essentially the Nez Perce had escaped through Targhee Pass.

24.5.1 What studies have been conducted on the Targhee Pass for historical artifacts from this time period? If not, when does ITD intend to conduct these studies?

24.5.2 Were the Flathead, Nez Perce, and Bannock Tribes contacted for comments on the intention to disrupt this land for wildlife overpasses?

24.5.3 Has an archeological study been conducted on this site? If not, when will it be done?

24.5.4 Targhee Pass is located within the historic Bannock Trail since the 1870s. What outreach has been done with the Bannock and other Tribes for their comments on disruption of this historic and cultural site? If outreach has not been conducted what is ITD’s intent to do so?

25. PUBLIC PARTICIPATION

25.1 What efforts were made to conduct outreach to all IP residents for input from the beginning, at the time when ITD was contemplating road construction at Targhee Pass?

25.2 Please provide documentation of the percentage of Island Park residents that were contacted when the project at Targhee Pass was only being considered, and at the initiation of the EA. When is the exact time the EA was initiated?

25.3 What plans, if any, does ITD propose to ensure that all IP residents will be informed of this project, provided regular and consistent updates, and provided various methods to submit comments?
26.1 NEPA requires that any proposed action gives consideration to “cumulative impacts”.

26.1.1 The eventual goal is to declare Targhee Pass as part of a wildlife corridor. What impact will this have on the overall socio-economic, recreational, multi-use, land development, and cultural structure of Island Park?

26.1.2 Upon defining the Targhee Pass as a corridor the next goal will be to use this as a juncture for connectivity to other corridors (such as riparian, ecological, ecosystem, biodiversity), including Yellowstone Park. What studies have been conducted on the impact this will have on the overall socio-economic, recreational, multi-use, land development, and cultural structure of Island Park?

26.1.3 Given the goal of connectivity, this will then proceed to more restrictive land use including buffer zones, restrictive development, and private land restrictions. What impact will this have on the overall socio-economic, recreational, multi-use, land development, and cultural structure of Island Park?

26.1.4 Island Park is comprised of BLM, USFS, and private land near Targhee Pass. What future goals does ITD have for an overlay in this area?

26.1.5 If this proposed action leads to the final objective for an overlay how does the applicant intend to acquire private land?

26.1.6 What role does the Great Northern Landscape Conservation Cooperative, High Divide, Yellowstone to Yukon, Western Governor’s Association, Henry’s Fork Legacy Project, Master Naturalists, IDFG, USFS, and Center for Large Landscape Conservation have in this proposed action?

26.1.7 Please provide documentation on all communications with the groups listed in 26.1.6.

26.1.8 What environmental impact is anticipated to the Targhee Creek, TyGee, Creek, Dry Fork, Howard Creek, and Timber Creek should an overlay be accomplished?

26.1.9 What is the intention to use the State Wildlife Strategic Action Plan in the proposed action especially if the goal is an overlay?

26.1.10 What is ITD’s intention for land acquisition for this proposed action whether via the USFS, BLM, or private property?

26.1.11 What role does Renee Seidler have as a road ecologist when other NEPA category requirements have not been met or studied? Does this not give the impression that a decision for three overpasses has already been made and goals of corridor, connectivity, and overlay are being implemented, especially since her previous work was for wildlife corridors and connectivity?
26.1.12 Please provide all documentation of communication with Renee Seidler.

26.1.13 What intentions does ITD and the USFS have for an eventual overlay in the Targhee Pass or Island Park area?

26.1.14 What impacts does ITD anticipate on land use regulations and restrictions if an overlay is applied?

27. **ADMINISTRATIVE RULES**

27.1 Any violation of NEPA can be challenged for violating the Administrative Rules Act. Is ITD confident that NEPA has been followed faithfully up to this point?

27.2 Studies conducted up to this point have failed to fully address all NEPA category requirements but instead narrowly focused on just WVC. What does ITD propose to study in order to fulfill all NEPA requirements in the event they choose to proceed with incorporating overpasses?

28. **ALTERNATIVES** – Clearly at the 7/27/17 meeting there was a severe lack of all possible alternatives for WVC reductions, with overpasses being promoted as the preferred solution.

28.1 Why is any discussion about the creation of corridors for connectivity avoided?

28.2 Why are the involved NGOs not requested or required to discuss their long term objectives for the creation of corridors and long term goals of connectivity?

28.3 Does ITD support the creation of different types of corridors along Hwy 20 in addition to their own established transportation corridor?

28.4 Why haven’t WVC statistics been used from the Fremont County Sheriff or Idaho State Police?

28.5 A 2009 Idaho Fish & Game report found that predatory wolf activity was the primary cause of Elk mortality. Why are the current reference studies not reporting this as part of their statistics on WVC?

28.6 Put in large flashing lights and warning signs similar to what is used at school crossings for children that warn drivers to slow down.

28.7 Prior to the above warning lights put those vibratory indentations in the road that will warn the driver to slow down.

28.8 Triple speeding fines, triple fines for collisions with Elk and notify the public you are doing it.

28.9 Studies regarding the negative impacts of overpasses and the validity of their use to promote connectivity should be included as part of the EA, and not exclusive to promoting overpasses as the only solution.

28.10 Reduce the current speed limit along Hwy 20 to 55mph, reduce the speed limit at
wildlife crossings to 45mph.

28.11 Cutting back the tree line in other areas of IP has been successful, do the same at Targhee Pass.

28.12 Equal consideration for input and involvement has not been given to IP residents, but primarily given to NGOs. The individuals involved in NGOs are not IP residents, their role in this matter should be significantly reduced or eliminated.

28.13 Proceed with the current road construction with improvements but do not put in any consideration for overpasses, use all other alternative means to reduce WVC. Do not destroy Targhee Pass for these structures or make any attempts to alter the migratory path of Elk with fencing. Force people to be accountable.

29. EIS

29.1 Given the substantial requirements in each category that have not been addressed or answered, is the applicant willing to move to the EIS phase of NEPA?

29.2 Currently, multiple categories have been neglected for consideration of three overpasses at Targhee Pass. How willing is ITD to provide answers and meet NEPA category requirements given this?

28.2 Given there is inadequate study or information regarding all NEPA requirements it is obvious that any discussion regarding overpasses is premature. Is ITD willing to make a good faith effort to meet all NEPA requirements for an EA?
Appendix D

Alternatives Development Workshop, July 27, 2017

Comments on Maps
Need parking and plowing for Nordic skiing access
"Wildlife Overpass on Salisbury prop"

"WL underpass somewhere where Howard Creek crosses road make it WL friendly"

"no truck passing lane needed Trucks go W on 87 thru Ennis & over Norris to I90. They only go over TP if they are local to WY"
Map 4
Targhee Pass
Alternatives Workshop July 27, 2017

WETLAND AREA
DO NOT BUILD OVERPASSES

MP 402
MP 403
MP 404
MP 405
MP 406

Big Horn Hills Estates

Howard Spring

WETLAND

Name: ________________________
Address: ______________________
City: _________________________
State: ___________ Zip: ________
Email: _______________________
Phone: _______________________
Follow-up phone call by Andrea Gumm of The Langdon Group on 8-1-2017: Cross-hatchings suggest possible wildlife crossing locations.
here's a spot where I think we should put an over/under pass

doesn't look like a good spot for an over/under pass

these two spots are where I've been seeing a ton of wildlife

MP 402

MP 403

MP 404

MP 405

MP 406

Bluebird Ln

Howard Creek

Howard Spring

Big Horn Hills Estates

Mountain View Dr
Build the overpasses where Patty Cramer recommends them! I strongly support building wildlife crossing structures on Targhee Pass. If you can only build 3, at least build one. Thanks FTO for holding this workshop, let’s continue the discussion.
“I support wildlife overpasses/migration corridor connectivity.”
“Install left turn lane. Improve road access.”
“Improve access to Howard Spring.”
“Remove guardrail. Elk will not cross at guardrail.”
“Remove guard rail, fill in to make level.”
I am a home owner and Board Member for the Bighorn Hills Estates which is located in your study area. I have a couple of questions and concerns related to the study and options.

1. I would support turn lanes into the Bighorn Hills subdivision. This would solve some safety concerns.
2. However, I would oppose passing lanes in front of the subdivision as I believe this will increase noise levels as cars and trucks ramp up to pass other vehicles. I would also support prohibition of air breaks in the area.
3. I do not believe that animal crossings are effective nor have they been proven to be effective long term. Has anyone considered one reason for animal crossings is for water in Targhee creek. I would suggest making some watering holes on the southeast side of the road to reduce the reason animals cross the road. There seems to be more animal hits just north of the Ashton hill than on this pass. This risk seems overstated.
4. Are large fences being considered to push animals to a crossing area? I have some concerns with snow removal and fences being able to withstand snow removal.
5. I would also like any option to continue to support and allow snowmobile access to the main trail on the North West side of the road from the subdivision.
6. Any option must support continued access into the subdivision during construction.

Our concerns are for wildlife as well as safety for humans. Safe passage in Island Park is needed but hand in hand is lowering of the speed limit on south end of Island Park to Montana!!!

My wife and I have been summer residents in IP for 20 years. This is where she grew up as her father was a forest ranger here. This area is noted for its mountains, rivers, lakes and abundant wild life. It is an example of how people and wild life can coexist and flourish. This happens through the efforts of the entire community. Presently, we have an opportunity to preserve and protect both people and wild life with three animal crossings across Rt 20 in the Targhee Pass area. Many studies show the need and effectiveness for such crossings to bring about safe animal passages across busy and dangerous highways. Once completed it will set an example of how the community is committed to the protection of both animals and people. With the help of Federal funds this project will accomplish a positive step towards an improvement of safety that is beneficial to all. And with a very small financial burden to the community. It is a "win-win" situation. It will be shared by all who visit this wonderful and unique part of the country.

I am interested in how these proposals will also affect snowmobile trail access and recreation. I like the ideas of protecting or minimizing animal collisions, but now sure how big of a problem it is currently... And do not want a decrease access for recreation.

My family owns a cabin in the area and I am, and have been for many years, a frequent visitor. I am very concerned about the reconstruction planned for Targhee Pass. I feel it is important to protect wildlife as well as human life. There has been a steady increase in the number of cars, many exceeding the speed limit, since I started visiting. Changing driver behavior and awareness is nearly impossible Therefore, I support alternative 2. I know animals will use special crossing structures, saving human life, wildlife and automobiles. It's been proven in other states and in Europe.

Thank you for your efforts at improving safety of both people and wildlife on US 20 over Targhee Pass. I've seen to many accidents and dead animals over the many years I've travelled in this area. Highway 20 is frightening and people tend to drive to fast. The increased trucks and large RV's are added risk. Everyone in a hurry to get to Yellowstone!

Would like to see:
Lower speed limits and favor alternative #2 – the more wildlife crossings the better. I also feel the digital message signs, animal detection signs, seasonal signage and advised speeds will be effective. Island Park area has this unique opportunity now to step up to the plate, take responsibility for protecting our wildlife and become a role model for other similar areas. Let's do it!

First of all, there should be some common sense involved. THESE OVERPASSES WILL NOT WORK!!! There are several in Nevada, on highway 93; that we have never seen any animals on or near. These overpasses involve miles of fencing and what will that do to the people that live in the area? Also, if built; the cost will be extensive. Not only in the building but also in the maintenance. Much better use of the money would be to clear the highway like the southern end of Island Park. A third lane all the way from Ashton Hill to the Montana line would be nice. Just because we have that money available, doesn't mean we need to spend it. Highway 20 needs to be resurfaced as well as better stripes and better signage. Besides, if the trees are trimmed back, there is another source of income. Because as it stands, there is a great possibility of an extensive forest fire. Speed limits should also be reduced.

Idaho needs overpasses for safe passage for animals and to save human lives and vehicular damage and animal lives. Idaho is the only lame state in the west that has no overpasses for animals.
Idaho counties, especially Fremont county has excessive animal vehicular collisions on highway 20.
Idaho government and citizens need to step up and be proactive and stop living with their collective heads in the dirt.

Thank you for the opportunity to comment on the Targhee Pass Environmental Assessment Alternatives for the Idaho Transportation Department’s (ITD) Highway 20 improvement project between its junction with Idaho 87 and the Montana state line.
The Theodore Roosevelt Conservation Partnership (TRCP) is a national conservation organization working to guarantee all Americans a quality place to hunt and fish. We represent more than 79,000 individual advocates and work with 1,400 affiliated local- and state-level clubs and organizations to achieve our mission.

The TRCP supports Alternative No. 2, building three wildlife crossings and the other measures to make that stretch of highway safer for people and animals.

Our support is based on the fact there is a need to increase public safety and an opportunity to properly protect a migration corridor used by thousands of animals annually. Alternative No. 2 is also the best choice because it is good for the region’s economy, not only to those who cater to sportsmen in Idaho, Wyoming and Montana, but those who make up the ever-increasing visitation records at Yellowstone National Park.

Public safety is the paramount interest and supporting efforts to decrease wildlife-vehicle collisions is common sense. Data suggests wildlife-vehicle collisions make up 10 percent of the accidents between Chester, Idaho, and the Montana line. The merits of increasing public safety, alone, are enough to enlist our support.

That support is amplified by the nationwide need to address the unnecessary loss of wildlife to vehicle accidents. The wildlife — elk, deer, moose and bears – are part of the foundation of Idaho’s recreation industry represents 78,000 jobs and $7.8 billion in consumer spending annually, according to the Outdoor Industry Association. Nationwide, outdoor recreation generates $887 billion in consumer spending and supports 7.6 million jobs.

Targhee Pass is a part of the migration route that delivers more than 10,000 animals from the Centennial Range and Island Park area to the Sand Creek Desert between St. Anthony and Dubois, Idaho. Those elk, moose, deer and pronghorn are the lynchpin of renewable hunting economy in Island Park, St. Anthony, Ashton, Rexburg, Idaho Falls and dozens of other towns, and must have safe migration corridors for their travel between critical seasonal habitats. Consider, for example, these statistics compiled from the Idaho Department of Fish and Game’s harvest data. In 2016, for example, 5,438 hunters spent 27,107 days pursuing deer, elk, moose and pronghorn in hunting units that tied to the winter range.

Maintaining connectivity between geographic areas – winter ranges, summer ranges and transition areas – is essential to the long-term viability of wildlife populations and the economy that survives on this renewable resource. As recently stated by Idaho Department of Fish and Game Habitat Manager Rob Cavallaro, “It is not just about protecting individual animals, but about protecting the ability of larger populations to use the different habitats that keep them alive and thriving. If we can’t keep habitats connected, it will harm the future of hunting.”

The effectiveness of wildlife fencing and crossing structures is best exemplified by the work in the Pinedale District of the Wyoming Department of Transportation (WYDOT). At the Nugget Canyon crossing on U.S. Highway 30, the construction of seven underpasses and game-proof fencing reduced deer-vehicle collisions by 81 percent. At the Trappers Point crossing on U.S. Highway 191, approximately 2,000 to 3,000 pronghorn and 2,000 to 2,500 mule deer pass through the well-known corridor each spring and fall. The TRCP encourages ITD to engage with the U.S. Forest Service to identify areas where the fencing makes sense for the wildlife while still being placed in areas that are not burdensome to land owners in the plan’s path.

Thank you again for the opportunity to comment on this important project.

10 We would like to comment on the proposed improvements on Targhee Pass. We have a family cabin in the area and have been coming there for 20 plus years. We highly support the installation of wildlife overpasses as we have seen how effective they are in preventing the loss of animal life and car accidents. Here in Colorado where we have another home, the installation on wildlife overpasses on Hwy 9 in Summit County has reduced animal collisions dramatically. We would also like a turning lane added for the trailhead at Targhee Pass.

11 ANIMAL PASSAGE WAY HAS BEEN VERY SUCCESSFUL IN OTHER AREAS TO INCLUDE BANFF AND JASPER PARKS IN CANADA. WE ACTUALLY HAVE FRIENDS THAT LIVE CLOSE TO JASPER, VISIT THERE FREQUENTLY AND THEY RELATE TO THE POSITIVE IMPACT NOTICED SINCE THEY INTRODUCED THIS CONCEPT. I APPLAUD THE CONSIDERATION SINCE I AM ON THE ROAD MANY EARLY MORNINGS FISHING EITHER DOWN HWY 20 OR UP HWY 20 AND HAVE A CHANCE TO SEE SO MANY ANIMALS ON THE ROAD SIDE IN POSITION TO CROSS OVER AS WELL AS CARCASS'S THAT HAVE NOT BEEN CLEANED UP YET. I HAVE ALSO HUNTED THIS AREA ON BOTH SIDES OF THE ROAD QUITE EXTENSIVELY AND HAVE DISCOVERED THE MIGRATING ROUTES THEY TEND TO MOVE IN. I THINK THE DOT HAS EAR MARKED THE APPROPRIATE ROUTS FOR THE ANIMAL SAFE PASSAGES.

SECONDLY, THE TURN LANES ARE AN ABSOLUTE MUST, I FEAR MOST TIMES COMING DOWN THE HILL, WITH VEHICLES ON MY TAIL, TO TURN IN TO THE SUBDIVISION AND AT TIMES COMING UP THE HILL WITH ENHANCED SUMMER TRAFFIC.

THIRDLY, AS A HOSPITAL AND AMBULANCE SERVICE ADMINISTRATOR I WAS ASKED TO SERVE ON THE DOT BOARD FOR SOUTH
I am a permanent resident of Virginia but live in Island Park about 5 months each year from May thru September. During that time, I travel US-20 from West Yellowstone over Targhee Pass to the ID-87 junction on an almost daily basis. Though I do not identify all of the problems you present, I presume that your data indicates the need for the road improvements.

What I do want to stress is the need for wildlife corridors as you are considering. These corridors have been shown to be effective throughout the Rocky Mountains from Canada thru the US. They contribute to driver safety and to animal safety. And they are especially effective in promoting the continuation of the flow of animal migration in the face of ever expanding human development. I do not believe that signage is very effective from either the driver or wildlife perspective. Thus I strongly support the inclusion of wildlife crossing structures. Either Alternative 2 or 4 would be acceptable, though Alternative 2 would seem to be the most effective considering the length of the project.

I’d be totally in favor of (1) widening highway 20 in the area you’re addressing; and (2) adding as many wildlife passageways as possible, plus the necessary fencing to ensure safer road crossings. Trimming back the foliage -widening the shoulders - would also be beneficial in my opinion. I’d also be totally in favor of reducing the speed limits on the entire hwy 20 from Ashton to the Montana state line. Signage has no impact whatsoever on driver behaviors. Very few ever drive at or below posted speed limits and the signs telling them of wildlife crossings go unheeded. This lack of regard extends to all drivers, including all of the commercial vehicles.

Please forward to comment site if I’ve sent this to wrong address. Wildlife overpass is great where wildlife needs it. Ashton Hill or Federal Hill I’m all in. Proponents need to get out of training wildlife business. Last person who builds in wildlife habitat in Fremont County think it’s their right to be the last. Go with slower nighttime speed limits and problems are mostly solved. Try connecting national parks in other parts of the country first. Thanks for your time.

I think the alternatives are quite well developed for the main issues of wildlife crossing and the need for a climbing lane. One item that could be addressed in more detail is the access to the Targhee Creek Road. The intersection geometry is rather poor and I think improvements ought to be given specific consideration, although it’s possible that very little can be done. While just outside the project boundary in Montana, one feature that deserves a brief mention is the Continental Divide Trail, which crosses US 20 just east of the summit. If a wildlife crossing structure is constructed near the top of the pass, it would desirable if it were built such that the trail could be routed over it in the future. That would give the structure an additional benefit and also showcase it to hikers passing through. Potential connection to the CDT should also be considered for the ATV/snowmobile crossing structure.

I would like to submit comments regarding proposed improvements to US Highway 20 and SH 87. I have yet to attend a public meeting but I have read through the printed information I have received.

I have lived in St Anthony since 1972 and I have owned or operated a business in Island Park since 1976. I make the drive from St Anthony to Island Park about 5 days a week in the summer months, the period when wildlife is along the road. I support improvements considered to widen or reconstruct the highway.

I am not in favor of fencing the highway and providing wildlife crossings for the following reasons:

1) Cost. I’m not sure of the projected costs but I have heard it could be upwards of $10 M of which Fremont County would be required to pay a share. I believe there is better use of taxpayer money. I love wildlife and I have seen a number of animals killed along highway 20 over the years. I have never hit an animal but I realize it is a problem. However, I don’t believe there are enough collisions to justify this expense.

2) We own a Subaru Outback. It is equipped with anti-collision detection and it works. We had a deer jump in front of us in Wyoming and this technology saved us from a collision. I’m not sure when the completion of this proposal would take place but I have heard it will be 2022 -2026. I believe that by that time many vehicles will be equipped with anti collision technology that will greatly reduce vehicle collisions with wildlife.
I am for Alternative 2 for the Targhee Pass project. I believe that is the best possible solution for wildlife. If we're doing more to help wildlife pass across the road safely, then more drivers will be safe. I am also for the safety and conservation of our Elk herds, and this area contains very important wintering grounds for Elk in this area. Because of this I believe Alternative 2 would be best.

I would like to enter my comments to you on the realignment and or reconstruction of the section of highway 20 from the junction of highway 87 to the Montana State Line. My background goes back many years to at least 1958 when I worked on a survey crew for the Bureau of Public Roads, (U.S. Dept. of Commerce, BPR) in Island Park. I worked on two projects that summer, the finals construction from Mack’s Inn to Sunset Lodge, and the realignment and the start of construction from Sunset Lodge to Montana Border. In 1961 I was employed as an apprentice Lineman in the West Yellowstone Area which included the power distribution around Henry’s Lake Flat down to Mack’s Inn. I have traveled over that road many times over the course of my career and have walked over the entire section of the study area while slope staking and running grade stake on the project. I am happy to know that this section of highway is slated for reconstruction. However, I am not in favor if a wildlife over pass on this project. My concerns are this.

1. The expense is excessive for the good it might do. The wildlife crossing the road in this area is not very high. It amounts to a few deer in the summer and an occasional moose and a few elk in the fall.

2. The fence to funnel the wild game to an overpass would be difficult to maintain with the high volume of snow that accumulates in the area. Having maintained chain link fences at substations in the area. I know firsthand how difficult it is to maintain and repair these fences in the snowy country.

3. If fences are built to funnel the wild game to an overpass, how would you provide access the summer homes and the ranch land? There is also an access road to the Targhee peak and Lionhead area from the Idaho side. How would you propose to allow passage through the fence so loggers and hunters could maintain access to that area?

I would much prefer the money wasted on a wildlife overpass could be used in other parts of the U.S. highway 20 corridor, such as the section from Chester to the Snake River Bridge north of Ashton. This stretch of road is outdated and in poor condition even after the expensive chip and seal coat that was applied last summer. The road is really too rough and narrow for the new 70 MPH speed limit and is already responsible for one fatality near the Falls River Bridge this year.

I travel this section of highway from Aston South, several times per week and hope there are plans in the works to continue the four lanes from Chester to beyond Ashton.

The reason the road was constructed four lanes through Chester was because of the casualties that took place at Chester. It is now time to extend the four lanes from this dangerous point at Chester where the traffic is funneled from four lanes to two.

Let’s face it. If the posted speed is 70 mph. Traffic will always exceed the limit by at least 5 mph. I see it all the time on this stretch of Highway 20.

Thanks for allowing me the opportunity to voice my opinion on the Targhee Pass area of your study group.
I have lived year around in Island Park for over 30 years and my husband has been here for 40 years now. We have raised our children here and own a restaurant here. I have worked for the US Forest Service since 1984 and have volunteered on the Island Park Ambulance as an EMT for over 10 years.

I have seen so many wildlife collisions which have resulted in injuries and or death to both human and animals involved that it is impossible to recount them all. Almost every time that I drive to Ashton I notice dead animals along the shoulders of the road. Also, the traffic seems to have grown tremendously over the last few years and the speeds that the people drive are reckless, especially at night.

I attempt to drive slowly during migration times and at night and am constantly being tailgated and/or passed by aggressive drivers wanting to go well over the posted limits. I very rarely see anybody pulled over for speeding. I hated to see the speed limit raised to 65 up here years ago and wish it could be lowered. I have been informed by friends who are able to attend the meetings up here that this is not an alternative.

I believe that the alternative that includes the most fencing and wildlife crossings would be the best for Island Park. This would be a long-term solution which will accommodate growth and increased traffic on this roadway. It will save lives and money and reflect well on our community as a place which values its wildlife.

As a business owner in the service industry I speak with many people over the course of a day. I feel the large majority of them are in favor of the wildlife crossings as the preferred alternative.

Thank You for considering my opinion on this important subject,
Thank you for the opportunity to comment on the Targhee Pass Environmental Assessment Alternatives for the Idaho Transportation Department’s (ITD) Highway 20 improvement project between its junction with Idaho 87 and the Montana state line.

The undersigned groups represent sportmen and wildlife enthusiasts from Idaho, Montana, and Wyoming. We are state and regional organizations working to recover and sustain wildlife in the intermountain west for our constituents and to guarantee them, and all Americans, quality hunting, fishing, and outdoor experiences. We represent more than 20,000 individual supporters and work with hundreds of affiliated local-, state-, and national-level clubs and organizations to achieve our missions.

We support Alternative No. 2, building three wildlife crossings and the other measures to make Highway 20 safer for people and keep more wildlife in its habitat.

Highway 20 sees thousands of iconic game, non-game, and fur bearing species – elk, moose, deer, bear, pronghorn, and others - valuable to Idaho’s economy, culture, and ecology cross its pavement annually. There is a need on Highway 20 to increase public safety while perpetuating East Idaho’s wildlife resources. Alternative No. 2 is the best option to maintain both especially in the face of increasing visitation records at Yellowstone National Park.

Our stance is further bolstered when considering Idaho hunting alone sustains 6,500 jobs with participation of over 250,000 Idahoans while 550,000 people participated in wildlife viewing activities (U.S. Fish & Wildlife Service 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation), with most wildlife viewing occurring in the Highway 20 corridor which serves as a migration route from the Centennial Range and Island Park to the Sand Creek Desert. Maintaining connectivity between these areas is essential to the long-term viability of wildlife.

The undersigned groups encourage ITD to engage with the U.S. Forest Service and Idaho Department of Fish and Game to identify areas where overpass fencing is most efficient for wildlife protection while not contributing with possible private land conflicts.

Thank you again for the opportunity to comment on this important project.


On behalf of the National Parks Conservation Association (NPCA), I appreciate the opportunity to submit these comments specific to the Targhee Pass Environmental Assessment and the draft alternatives released by Idaho Transportation Department (ITD) on August 30, 2017. The plan puts forth four potential alternatives for improving traffic flow and increasing driver safety on Targhee Pass, located on U.S. 20 between the Junction of ID 87 and the Montana state line. We are writing to urge ITD to implement Alternative 2. This option best meets the goals of ITD to improve driver safety and upgrade the road, while providing improved opportunities for wildlife movement and reducing the risk of wildlife-vehicle collisions (WVCs) on Targhee Pass. NPCA’s mission is to protect and enhance America’s national park system for present and future generations. NPCA and our over 1.3 million members and supporters including 4,500 in Idaho have a long history of advocating for the protection of national parks and park resources, both inside national parks and on adjacent lands.

ITD is conducting an Environmental Assessment to evaluate the costs, needs, and opportunities associated with the reconstruction of U.S. 20 between the ID 87 junction and the Montana state line as part of the U.S. 20 Corridor Plan. This stretch of highway known as Targhee Pass has the potential to impede wildlife movement for many species that migrate beyond the borders of Yellowstone National Park. The location of this project lies within important habitat for moose, elk, mule deer, grizzly bear, pronghorn, wolf, and wolverine, and all have been identified crossing U.S. 20 on Targhee Pass or are known to occur in the area. ITD has recognized that this is an important corridor for wildlife movement. We also appreciate ITD’s recognition that wildlife movement across U.S. 20 is a safety issue for drivers. In 2014 there were 17 WVCs on Targhee Pass. Incorporating WVC mitigation strategies into Targhee Pass is essential to increasing driver safety, and ensuring the protection of park wildlife and wildlife corridors beyond park borders.

As part of the planning efforts, ITD commissioned a study by Patricia Cramer to understand and identify opportunities for improving traffic flow, driver safety, wildlife movement, and road conditions. Cramer’s report found that Targhee Pass, from the junction of ID 87 and U.S. 20 to the Montana state line may be the most important area within the U.S. 20 Corridor Plan for WVC impacts and mitigation opportunities. Cramer states that this four-mile stretch of highway is of the greatest value for wildlife connectivity, due to
the area’s proximity to Yellowstone National Park and the volume of wildlife that moves through this area. This area also serves as a link between the Greater Yellowstone Ecosystem and the Centennial Valley and Mountains, and provides critical wildlife corridors. Because this stretch of highway intersects migration routes and seasonal movement paths for many species, the risk of WVCs is exceptionally high here and the threat to Yellowstone wildlife is significant.

Alternative 2

NPCA applauds ITD for recognizing and evaluating the impacts of U.S. 20 on wildlife movement and migration, and the need to incorporate WVC mitigation features into the planning process to facilitate wildlife passage and reduce WVCs on Targhee Pass. We commend ITD for taking the time to go through this comprehensive review to better understand current risks, mitigation strategies, and potential solutions for reducing WVCs on Targhee Pass. We also appreciate ITD’s commitment to coordinate with the United States Forest Service, Idaho Fish and Game, and Fremont County to develop a plan that will improve traffic flow on U.S. 20 while facilitating wildlife movement.

NPCA recommends that ITD implement Alternative 2. If adopted this alternative would best meet the dual goals of improving traffic on U.S. 20 and reducing WVCs. Alternative 2 is a forward-thinking plan that will reduce WVCs on Targhee Pass, facilitate habitat connectivity and migration routes for Yellowstone’s iconic wildlife, and identify ITD as a leader in innovative transportation planning.

NPCA’s Support for Alternative 2 is based on:

We support the inclusion of three wildlife overpasses and associated fencing, gates, and escape ramps into the Targhee Pass plan. As Cramer’s study states, a WVC mitigation strategy that incorporates overpasses, fencing, gates, and escape ramps is the most effective option for mitigating WVCs and facilitating wildlife movement across roadways. We encourage ITD to refer to Cramer’s study and other resources to develop a cohesive system of overpasses, escape ramps, fencing, and other features to create structures that are likely to encourage use by wildlife species that frequent the area.

As Cramer’s study demonstrates, human behavior modifications alone are not sufficient to change driver behavior and reduce WVCs. It is important to install the full suite of road modifications and wildlife crossing options on Targhee Pass, rather than relying on human behavior modifications alone. Alternative 2 increases driver safety by significantly reducing instances of wildlife on roadways. This is particularly important when considering the identified actions in Alternatives 2, 3, and 4 to straighten the roadway on Targhee Pass. Roadway straightening will lead to increased speed, which, without these WVC mitigation efforts in place, could result in an increase in the volume and severity of WVCs and driver injury. Straightening the roadways should only be done with the full scope of Alternative 2 mitigation solutions in place. NPCA encourages ongoing coordination with Montana Department of Transportation to extend wildlife fencing onto the Montana side of Targhee Pass, past the state line. This coordinated effort will ensure that wildlife, which does not recognize political boundaries, can safely move across the landscape and maneuver hazardous roadways regardless of state boundaries.

A system of overpasses, fencing, gates, and other features aimed at encouraging safe wildlife movement across roadways is the most effective method for reducing WVCs, increasing driver safety, and facilitating a better traffic flow in high-wildlife-use areas. However, we recognize there are costs associated with this alternative and encourage ITD to explore funding opportunities including state, federal, and private funding sources to alleviate the cost of this project. We also encourage ITD to implement temporary WVC mitigation methods while securing funding and during construction, to quickly put into place measures to reduce WVCs and increase driver safety on Targhee Pass. It is imperative that wildlife and driver safety drive ITD’s actions on Targhee Pass.

We appreciate the opportunity to provide input during this comment period.

23
Greetings, I drive this route 2-4 times/ year and wholeheartedly support Alternative #2 which includes 3 crossing structures. Additionally I would support future efforts by IDT to add similar measures statewide wherever there are safety risks to drivers and ecological benefits. I consider these measures an excellent use of my tax dollars and a positive for job growth, local economics, human safety and wildlife diversity. Thank you for the opportunity to comment.

24
As an acting state co-chair for Idaho Backcountry Hunters and Anglers (ID-BHA) I am writing on behalf of our members to comment on Idaho Department of Transportation’s (ITD) Targhee Pass Expansion Project on US-20, which proposes to reconstruct four miles of US 20 with a truck lane over Targhee Pass near Island Park.

The BHA mission is squarely focused on ensuring the future of hunting and fishing on wild public lands and waters. We are an Idaho Chapter of BHA representing a wide membership in eastern Idaho.

The project reach has been identified as an important corridor for migratory elk and both migratory and non-migratory moose; the area is also important for other wildlife including mule deer, black bears, grizzly bears, pronghorn antelope, wolves, and wolverine that move or migrate in and out of Yellowstone National Park. Unfortunately, this same stretch is also a known hotspot for wildlife-
Given the importance of this area for wildlife connectivity and the regional conservation of big game and other sensitive wildlife we commend ITD’s considerations of wildlife passage for this project. We applaud ITD for including in the range of alternatives, Alternative #2, which includes three crossing structures, fencing, escape ramps and fence end treatments because this is the only alternative that fully mitigates for wildlife vehicle collisions and enhances wildlife movement across U.S. 20.

We understand that infrastructure projects are expensive. Simply replacing road base can cost millions of dollars; adding wildlife passage, recreation and other safety factors drives costs even higher. We are committed to helping ITD find funding solutions.

Thank you for the opportunity to comment. We plan to continue our engagement on this project as it progresses.

The U.S. Environmental Protection Agency has reviewed the proposed range of alternatives to be analyzed in the Targhee Pass Project Environmental Assessment, which is scheduled to be released in the summer of 2018. We are submitting comments on the proposed alternatives in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate the opportunity to provide recommendations at this important stage of the NEPA process.

We appreciate the work done to date to develop the proposed alternatives, and note that they currently vary only in the design features that would address wildlife-vehicle collisions. As a general approach, and particularly due to the importance of providing ecological connectivity in the greater Yellowstone ecoregion, we encourage that the Environmental Assessment include the analysis of a reasonable range of alternatives with multiple options for providing wildlife crossing structures and fencing, as well as other features, thereby providing a high level of confidence in the alternatives; effectiveness to meet the project purpose and need, as well as the goals and objective of the Targhee Pass project. (1)

As currently proposed, Alternative 2 would provide three wildlife crossings, fencing for the entire project length, fence and treatments, wildlife escape ramps, and gates, electric mats, and/or wildlife detection/driver warning systems at vehicle access points. Alternative 3 would provide no wildlife crossing structures but include other wildlife-vehicle collision reduction measures that may include animal detection systems, digital variable message signs, and seasonal wildlife warning signs and advisory speeds, and vegetation removal. Alternative 4 would provide one wildlife crossing structure with three miles of fencing and associated features as in Alternative 2, and the remaining unfenced portion would use other wildlife-vehicle collision reduction measures such as those described in Alternative 3.

In order to inform the alternatives design with the best available science, we suggest a recent research article entitled, How Effective Is Road Mitigation at Reducing Road-Kill? A Meta-Analysis. (2) This meta-analysis uses data from 50 studies that quantified the effectiveness of various mitigation measures designed to reduce road-kill. They found that the combination of measures involving fencing and crossing structures resulted in an 83% reduction of large mammal mortality, compared to 57% reduction in mortality using animal detection systems.

We recommend that additional reasons to provide a wider range of wildlife crossings options in the alternatives analyzed include:

The risk of wildlife-vehicle collisions will increase with increasing traffic volume and speed that would occur due to the proposed roadway improvements;

Wildlife crossing structures are the most cost-effective means to reduce wildlife-vehicle collisions and enhance wildlife movement. Crossing structures can pay for themselves in approximately 10 years. (3)

Wildlife crossing structures reduce habitat fragmentation and the barrier effect caused by roads and traffic, which cannot be achieved with wildlife warning signs and detections systems;

Wildlife crossings structures would accommodate a full array of species, including small, medium, and large mammals, and low and high mobility species. We note that suitable habitat for grizzly bear is located on both sides of the US 20 project corridor, and that a grizzly bear was killed on US 20 in 2014; and,

Wildlife crossing structures can also provide hydrological connectivity, fish passage and movement of sediment and nutrients, as well as species movements and genetic exchange.

We suggest that each proposed alternative include an appropriate number and location of wildlife crossing structures combined with fencing and the necessary associated elements, such as escape ramps. We further recommend that differences among the alternatives could be expressed with specific design options on the crossing structures and locations that variously address the wildlife-vehicle collision hotspots along the highway.
We appreciate the opportunity to offer recommendations on the range of alternatives at this point in the process. We believe that alternatives analysis and selection are key to a successful NEPA process and outcome.

(1) Project need includes improving driver safety. Project goals and objectives include “Enhance wildlife movement across US 20 within the project area. Wildlife movement across US 20 is a safety issue for both drivers and wildlife and can impede migratory, dispersal, and daily movements of wildlife (Clevenger and Huijser, 2011).”


(3) Idaho Fish and Game presentations, July 18, 2017

26 As an initial comment, I’d like to say the Langdon Group and ITD have done an exemplary job working in joint effort to include the public in the planning for the Targhee Pass Highway Project. Following NEPA protocol, presenting the project and alternatives for public comment is standard procedure; your continued efforts for this project are admirable.

As ITD and the Langdon Group have opened up to the public an opportunity to comment, relative to the four alternatives presented regarding the project’s Environmental Assessment.

As an introduction to my comments, I look at Hwy 20 and the recent overpasses ITD has built south of the easterly access to Teton Valley via ID-33. As an analogy, these overpasses provide the same safety as the wildlife overpasses would provide: instead of man to man, vehicle to vehicle collision, they provide safety for man/vehicle to wildlife reducing the opportunity for incident. As successful as these overpasses have been, it is obvious more wildlife overpasses would be the right thing to do in accordance with Alternative Two, my choice of the four alternatives.

However, I do have a few thoughts to consider:

The Targhee Creek area is heavily used by seasonal recreationists. Could a safe passage be incorporated in the design?

To facilitate fish passage, could all creek crossings include bottomless culverts or other effective designs?

Could the climbing lane be a little less over engineered?

Access to Targhee Creek should include a turning lane for safety.

A reduced speed limit (perhaps 45 mph, day and night, year round) to enhance the safety factor for both passenger vehicles and wildlife. This would most likely discourage large truck traffic and hopefully they would reroute to a highway designed for heavier industrial vehicles thus reducing the daily wear and tear on Hwy 20.

In summary, ITD is demonstrating their dedication to the public and wildlife by not only improving traffic safety at Targhee Pass and Hwy 20 by including safe passage structures for wildlife and recreationists, but to demonstrate to the public traveling Hwy 20 to points north that ITD recognizes the value of wildlife in the Greater Yellowstone Ecosystem and is willing to take bold steps to reduce wildlife-vehicle collisions.

Thank you for this opportunity to participate in the NEPA process.

27 I have read and studied the proposal for the U.S. 20 Corridor and believe that this is not something that should be supported with Transportation Dollars that need to be spent on Idaho Roads and Bridges.

I believe that with improvements to our roads and bridges (additional lanes, reduced speed limits in specific areas, the cutting back of trees for increased visibility, etc.) that most issues can be resolved.

As a Tax payer, I oppose the proposed U.S. 20 Corridor. I feel it’s a waste of money that can be used more effectively in repairing/replacing infrastructure that already exists.

28 I have grown up and almost spent my whole life in the island park area and went to school in Ashton, I have some concerns about the building of wildlife overpasses, first is that I do think that the plan on rebuidling of hwy 20 is a must I agree with that completely, but these wildlife overpasses are not the right thing I believe first is that our tax dollars are tightly spent as it is and should not be used on wildlife overpasses, and the tax dollars that will be spent to maintain them and the fences, money pit as I see it, and the access cut off to our public lands is another big deal I no it is what will happen and that is not what we as true locals want here, I believe that with strong speed limit changes specially at night and the cutting back of trees from highway is way more affordable and practical then the overpass, and I am also worried of how this will affect the natural migration of these animals, you can’t tell me there like cattle and are just going to follow a fence till they see a open spot, this is a bunch of bs I think, and is just another way for people in Washington to try and shut us out of our public lands, there were I think 4 reported animal and vehicle accidents reported in 4 miles at Targhee and 87, come on 5 million dollar overpass to try and stop them from collisions, something does not sound right to me, I would not be surprised if this group that is pressing this matter is the same group that wanted to make Island
Park area a national monument a few yrs ago, they want to use this idea to slowly take away our public lands and make a bypass to the Yukon. Anyone who believes this group is either paid off or plain crazy.

I do not wish to default your work but things change. I would like to make the suggestion that you look at what was done on the highway leaving Calgary, Alta. Canada going West into the Kananaskis. The attempt was made to allow animal high traffic areas of the road to be fenced on both sides with overpasses. At first it seemed like the idea was a bust but now with the aid of cameras counting wildlife crossing, it has shown that there was far more wildlife being inhibited by the highway than previously estimated. A lot more. So it is a success, perhaps in spite of ourselves but often that is the way we learn is it not? At least please consider an option for our wildlife to cross over/under our highway. It is an actual break in their trails. It is a serious annexation.

This letter is in response to the comments that are being accepted for changes to Highway 20 through Island Park. I am in full support of wildlife crossings in one or more sections of this highway as it is a dangerous stretch of road, no matter what time of year it is. As a resident of Victor who spends a great deal of time recreating in the Island Park area, I am glad to see the Idaho Department of Transportation looking at alternatives such as the one suggested by Dr. Cramer. Wildlife crossings across the U.S. and Canada have been shown to dramatically decrease the incident of vehicle-wildlife collisions therefore saving both human property, lives, and wildlife.

Reduced speeds have also been shown to be effective at decreasing wildlife-vehicle collisions and I would encourage lower speed limits to be considered as well. Even lowering the speed at night only and placing "Your speed" signs can be quite effective as well. Hwy 390 in Wyoming has experienced almost a 100% decrease in moose and elk killed along the highway due to reduced night speeds and signage.

I thank you for your consideration to keep our state's citizens and wildlife safe and alive.

One of the tasks mentioned for public input regarding Targhee Pass is identifying issues that have not been considered. There are several issues that must be included for consideration, and must be addressed.

1. Since the Yellowstone to Yukon (Y2Y) director, Kim Trotter, is involved in the Targhee Pass proposed project, the issue of the Y2Y involvement in the Great Northern Landscape Conservation Cooperative (GNLCC) must be disclosed.

2. As part of that disclosure the issue of GNLCC's intent for building overpasses for the purposes of corridor creation for connectivity must be included as an issue as Y2Y is a GNLCC participant.

3. As a Y2Y leader, Kim Trotter should be obligated to discuss her role in advocating overpasses as it relates to the GNLCC, and discuss the overall objective for corridors and connectivity, including what the intent is following the accomplishment of both.

4. Renee Seidler's role in the Pronghorn project was for the purposes of a corridor. The issue is her intent for the same at Targhee Pass and how this would impact not only Targhee Pass but the Island Park community.

5. It only seems reasonable that given the push for overpasses that the long term objectives must be given consideration as an issue. It is not as simple as whether or not to put an overpass at Targhee Pass given the multiple groups and individuals who are behind this endeavor. All of those individuals and groups must be identified as an issue that has not been given any consideration up to this point. The relationship of those groups to the current advocates for an overpass are part of this issue, that cannot continue to be ignored.

I am asking this information is included in the official record as a comment and that the GNLCC activities, and its association to Y2Y and Kim Trotter, are added as an issue regarding the proposed project at Targhee Pass.
1. Alternative #3 is the only alternative that should be considered at Targhee Pass, reconstruct the road to include:
   a. widening the shoulder width
   b. upgrade/replace the pavement
   c. passing lane for slow moving vehicles
   d. improvements to reduce road icing
   e. improvements for drifting snow
   f. improvements for trail crossing, OHV, snowmobiles
   g. NO changes should be made to "enhance" wildlife migration OR connectivity
   h. all other alternatives for WVC should be considered for implementation
   i. prevent all private property impacts

2. The alternatives do NOT reflect the issues and concerns of the people who live in IP, they reflect the agendas of initiatives and NGOs by individuals who do not even live there. In fact, the very issue that IP has expressed about these groups being involved has not even been identified as an issue by ITD. Why? I would like to add this to your list of issues not addressed, the involvement of NGOs, initiatives, and individuals with ITD and their agenda for overpasses that lead to corridor and connectivity. In fact, prior to those issues being raised by the public there was very little mention of them or what connectivity means.

3. What started out with overpasses along the whole US 20 corridor through IP was suddenly reduced down to just TP. Why? Was this the originally agenda from the beginning because of its proximity to Yellowstone Park which is the drive behind the NGOs and initiatives?

4. Alternatives are nothing more than a canned procedure by NEPA that are designed without any public concern or input. The goal has always been overpasses so they were neatly included in 2 alternatives. While required, it seems that because of omitted involvement by the public from the beginning, back when 3 studies were conducted with no public involvement, alternatives should include that omission. Studies should be conducted with public input, for instance, using other WVC data such as from the Sheriff and ISP, whose numbers do not line up with the studies, or that people calling in WVC data to the IDFG is not reliable as the mortality of the Elk or other animals cannot be identified as a WVC or from other causes.

5. The items listed with the alternatives that should be included are lower speed limits, turn lanes, access to public land, methods other than overpasses to prevent WVC. In spite of ITD claims that higher speeds are safer, there is ample evidence that indeed there are more injuries and deaths related to higher speeds. This is borne out by ITD itself after it raised the speed limit in 2014. Their own data shows the increase, pgs 9-12.

6. Although avoiding cultural resource impacts such as the Nez Pearce Trail is listed, there is absolutely no mention of the historical significance of the Nez Pearce and Bannock Tribes in that area from the mid-late 1800's. That is the significance, their use of that whole area at TP, why is that being ignored? I am asking this information is included in the official record as a comment and that the GNLC activities, and its association to Y2Y and Kim Trotter, are added as an issue regarding the proposed project at Targhee Pass.

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It should be obvious to anyone that if you are going faster it takes longer to slow down or stop. What is not understood about that?
been done, where is that located for review? How do you avoid historically eligible resources when the whole TP was used by Tribes?

7. The Elk do not migrate through the Targhee Pass, it is further south which is why it requires the disruption of land with fencing, and the forced change in movement by the Elk. If you truly want to "maintain and enhance" wildlife movement or migration why are you wanting to change their movement? Is this not a dichotomy in your thinking? You cannot enhance something that already exists by changing it.

8. The FHA individual seemed pretty confident there will be no issue with getting overpasses built, why? What knowledge does he possess over what the public wants? Even without any study being conducted he knows the wetlands and geography will withstand an overpass and there will be no NEPA concerns regarding either. The site says a wetland delineation was completed, where is that located for review? How can you possible avoid the wetlands with an overpass when the whole area is water? What are the "best management practices" being considered for water quality?

9. Of course an overpass will affect the visual management objectives, explain how that cannot be avoided with an overpass.

10. How will road improvements affect wildlife? Explain how there is no understanding that building an overpass and forcing a change in current migration with fencing does not affect wildlife. Of course fencing will affect private land access, what is not understood about this?

11. While current consideration regarding fencing and crossing is disregarded, if the agenda to put an overpass goes through this will become an issue because it will be one of the next steps for NGOs and initiatives to try and get a wildlife corridor declared, that will force this issue at that time. Overpasses are nothing more than an incremental step to take over the TP area.

12. No answers have been given on who will bear the cost of overpass and fencing maintenance. Regardless, it will most likely fall in the lap of the taxpayer.

13. Explain how IDFG expects a "net gain" benefit for wildlife. IP and TP should not be generalized to "similar locations", that removes the unique character of the area. IP is not just another piece of ground that needs re-engineering to someone else's idea of how it should look.

14. A state representative attending the meeting was very explicit that transportation money is only to be spent on roads and bridges for repair, construction, or reconstruction. It is not to be used for wildlife overpasses or anything related to it. In Wyoming, the legislature chose to spend all of their dollars for overpasses and neglect other necessary road work through the state. Take note, it was the legislature that made that decision, not the transportation department. Has the Idaho legislature indicated they would consider the same? All of the state representatives I have spoken with have had no knowledge of proposed overpasses at TP. Given the needed repairs to roads in Idaho it is clearly irresponsible to consider spending transportation dollars on an overpass. I do not want my tax dollar spent for that, either federal or state. It would be interesting to know where the money came from for overpasses in other parts of the state and if that cost has been included in my tax bill. The legislature had difficulty with the transportation budget this year, maybe it is these type of projects that make it so difficult.

This has been a very frustrating experience knowing that ITD and FHA have moved forward with their ideas and forgone the primary importance of involvement by people from the community and their local representatives. Just knowing that NGOs and initiatives have been given the highest priority for involvement is so wrong and the antithesis of how our government was designed to work. Please stop and give consideration to that fact.

My husband and I would like to express our support for alternative 2 as the construction plan for hwy 20 from mile marker 402 to the Montana border. We support this alternative because it has the most wildlife-friendly concepts in it. We also support any restrictions that might be necessary to prevent human interference with the proposed passageway strategies, including snowmobile trails and hunting access.

This is to let you know that I think the EA process has been a good process and I believe the range of alternatives appropriately reflect community input over the months. Below is a letter to the editor to the IPNews that summarizes my views in more detail.

Targhee Pass Environmental Assessment Has Been a Good Process

I look forward to the road improvements on US 20 over Targhee Pass. The highway was built in 1954. It has far exceeded its "expected life-cycle of 40 years" and some features such as shoulder widths are not up to current standards.

The improvements being considered will benefit all of us and future generations. Imagine how much traffic has increased since road construction in 1954 and how much more it might increase over the next 40-60 years. The highway improvements are necessary to accommodate those increases in traffic and improve safety.
Unless the “No Build” alternative is chosen, Idaho Transportation Department (ITD) will replace both the pavement and the foundation, similar to the work done on Ashton Hill the last couple of years. They will add a climbing lane over Targhee Pass; and turn lanes at Bighorn Estates (both entrances) and at Howard Springs. Just as with the work on Ashton Hill, I do not look forward to living through the construction phase, but the result will be well worth it.

ITD has clearly heard public concern about access to public lands. They have plainly outlined in public documents, that they will preserve public access for recreational use and honor cultural resources. District Ranger Liz Davy says “the snowmobile trail would not be closed.” Display boards posted online by ITD confirm that the Howard Springs Wayside, where the Nez Perce silhouettes are also located, would not be touched. If fencing is installed - it is included in two of the four alternatives - there will be gates for human access to public lands and maintenance of the snowmobile trail.

Three of the four alternatives being considered by ITD also include various provisions for reducing wildlife-vehicle collisions, ranging from sophisticated animal detection systems and digital signs to one or more crossing structures with fencing.

Whichever alternative is ultimately selected - to be announced next summer followed by another 30-day public comment period - the public has been informed during the entire process since 2006 and has had ample opportunity to comment.

ITD has made multiple public presentations, received hundreds of comments, posted extensive information online, and another 30-day comment period is currently open. Ultimately all comments will be compiled into a document that will be made public. The process has been very transparent throughout.

I am pleased that the stakeholder working group convened by ITD to provide input to the process, includes a wide range of citizen representatives; elected officials such as our mayor and a county commissioner; representatives of two Native American tribes, IDFG, USFWS, and our district ranger; representatives of the City of Island Park, West Yellowstone, Fremont County Public Works and Federal Highway Administration; the editor of the Island Park News; and representatives Yellowstone National Park and two conservation organizations.

I hope that members of the stakeholder group who are associated with the IPNews will carry out their responsibility to share accurate information back out to the public about the Environmental Assessment.

There is one additional item that I hope you will take a look at. The ”Targhee Creek Trail” is a gravel road to the north of US 20 just past Bighorn estates and the big turn. It is marked with a big brown highway sight as you ascend Targhee Pass; no sign coming the other way. The road is an abrupt 90-degree turn off the highway, with shoulders too narrow to turn off to prepare for a turn. This is already a scary intersection. With increasing traffic over the years it will become either impossible or a site of bad collisions. The Targhee Creek Trail is used for hiking access. I know numerous people in Island Park who enjoy hiking that trail. A women’s hiking group whose hikes draw 40 or more members each week - probably in 25-30 cars - hikes the trail every year.

The best bang for your buck when it comes to safety on any 2 lane road is widening projects. I have always been taught to “Leave myself an out when driving. If the edge of the road is a soft shoulder 1 foot from the fog line there is no “out”. If someone get impatient and tries to pass nowhere to run. If a moose appears in the night nowhere to go. 20 has improved greatly since I was a kid. More pass lanes added on Ashton Hill has reduced the severity and frequency of accidents. With today’s increase speeds the margin of error also needs to increase. I was shaking my head to think that someone thinks that you can get an animal to abide a “crossing” seriously? Animals go wherever they damn well please. The best chance they (and the motorist) have is room for the car/truck to maneuver around said animal. Hands down the best money spent on US6 in Utah has been adding passing lanes and expanding the shoulder. About one or twice a week I go 3 wide in a 2 lane because someone just had to get around that slow mover coming the other way. The more shoulder (i.e. “break down lane”) I have to use, the more chance of that situation being a “close call” rather than a tragedy. Another big improvement I have seen on 20 is the areas where the tree line has been cut back. A large animal stepping out of the tree line has a better chance when he is not just stepping straight out in to traffic. When the animal and the human can see each other the human can slow down and the animals can hesitate instead of panic and jump into traffic. Those are just my thoughts and I am sure you will agree that they are just common sense. 20 is a LONG stretch of road and widening is not cheap so pressing forward and not wasting funds on silly “animal overpasses” is key to long term safety.

1.) Please re-evaluate the corridor/data by which you decided to make a 2 left head turn lanes for Big Horn Estates. But not make a left hand turn lane for Targhee Pass Trailhead. If the criteria do not support a left hand turn lane for the trailhead, at least improve signage to make it more visible and informative from the south and put a trailhead from the north there is none currently. I drive Targhee Pass often.

2.) Traffic on highway 20 will continue to increase so we must plan for that. Year-to-date visitation on 2017 is 17.4 percent higher than 2012. Wildlife vehicles collision will only increase our under reported currently. In addition to human and wildlife safety concerns, a wider highway and more traffic will mean winter/spring migrations of elk, will be coat ailed for all practical purposes. Crossing by deer, bear and moose will also be inhibited. This necessitates alternatives number 2 (3 overpasses and fencing)
On behalf of the Greater Yellowstone Coalition (GYC) and the Yellowstone to Yukon Conservation Initiative (Y2Y) please accept the following comments on the Idaho Transportation Department’s (ITD) Targhee Pass Environmental Assessment (EA) that proposes to reconstruct four miles of US 20 with a truck climbing lane from the junction of SH 87 to the Montana state line between milepost 401.5 and milepost 406.3 near Island Park in Fremont County, ID. The Greater Yellowstone Coalition is a regional conservation organization based in Bozeman, MT with offices in Idaho and Wyoming and over 95,000 supporters from across the country. Our mission is to work with to protect the lands, waters and wildlife of the Greater Yellowstone Ecosystem (GYE), now and for future generations. Our members include residents living in eastern Idaho including Fremont County and Island Park, southwest Montana including the Madison Valley and West Yellowstone as well as visitors enjoying the GYE. GYC works to work with diverse stakeholders to ensure the lands and wildlife of the GYE are protected and managed for healthy, functioning ecosystem. This includes transportation projects that have the ability to alter wildlife habitat and populations.

The Yellowstone to Yukon Conservation Initiative is a transboundary conservation organization with offices in Canmore, Alberta and Driggs, Idaho. Our mission is to protect and connect habitat from Yellowstone to Yukon so people and nature can thrive. We are the only organization dedicated to securing the long-term ecological health of this entire region. We take a scientific and collaborative approach to conservation, and highlight and focus on local issues that affect the region. We have worked with more than 300 partners, including scientists, conservation groups, landowners, businesses, government agencies as well as First Nations and Native American communities to protect this landscape.

Public input
Once again, we commend ITD’s efforts to both engage the public on the Targhee Pass project and provide a range of alternatives that reflect the concerns of the public. The Targhee Pass project continues to garner significant public interest as reflected in the front-page story in the Idaho Falls Post Register entitled "Wildlife overpasses examined near Island Park," which subsequently received national circulation in U.S. News and World Report and the Associated Press. In addition, the recently convened Stakeholder Working Group (SWG) and the public meeting held in August received a diverse and growing voice from Island Park residents including support for wildlife passage and lower speed limits.

Range of Alternatives
During this public comment period, ITD asked the public to provide comment on whether the proposed alternatives captured all the issues the public brought forward. As you know, Y2Y and GYC have advocated for an alternative that mitigates impacts to wildlife vehicle collisions and maintains seasonal wildlife movement. This is particularly important for the elk herds that migrate to the Sand Desert and Madison Valley west of Yellowstone and other sensitive, wide ranging species like grizzly bears and wolverines. We commend ITD for including in the range of alternatives, Alternative #2, which includes three crossing structures, fencing, escape ramps and fence end treatments. This is the only alternative that fully mitigates for wildlife vehicle collisions and enhances wildlife movement across U.S. 20. However, based on the information ITD provided during the July SWG meeting, public comments and further research by Y2Y and GYC, we provide the following suggestions to be analyzed in the range of alternatives.

1. Truck Passing Lane. During the August 28, 2017 SWG, ITD’s Ben Burke presented a Traffic Report for Targhee Pass describing the existing level of service without any changes to the road in 2022 with a D grade. ITD only studied a passing lane with offices in Canmore, and alternatives 3 will have minimal impact on reducing WVC’s and of course no impact on preserving wildlife corridors. Thank you for the public information meetings and listening to citizen input!

2. Speed and Design. Many Island Park residents and decision makers have requested slower speeds along Targhee Pass and Hwy 20 in general. This was supported by comments from Fremont County Sheriff Len Humphries during the August 28, 2017 SWG. This was further reflected during the public meeting garnering significant public discourse and in a recent meeting in Island Park that ITD attended. In response, the BIOWEST EA contractor stated that reduced operational speeds would not meet the Purpose and Need for the project. While studies have shown that reducing speed limits alone are ineffective, other studies have demonstrated that accidents with wildlife significantly increase with increased speeds. In Yellowstone National Park, accidents occurred 3.5 times more often at 55 mph than at 45mph. Wildlife vehicle collisions remained noticeably lower under 45 mph.

3. Turn lanes. While ITD adequately addressed a turn lane to Bighorn Estates subdivision, the Targhee Creek turn remains dangerous.
and unaddressed in the current alternatives. If there is a passing lane for the full length of the project, cars passing in the uphill passing lane will be accelerating in a lane that will also have stopped vehicles, waiting to make a left-hand turn into Targhee Creek. We recommend that every alternative consider eliminating the passing lane around the primary curve at Targhee Creek and replace it with a left turn lane into Targhee Creek.

4. Recreational Access. The Valley View snowmobile and ATV trail run the length of the Targhee Pass project. It will be important that recreational travel be adequately addressed and mitigated with the expansion of Targhee Pass. The Wyoming Department of Transportation addressed recreational use on Togwatee Pass by installing a series of underpasses that are used by both wildlife and snowmobilers. This is a design that we encourage ITD engineers to consider in addressing motorized recreation along Targhee Pass. Recreational access and underpasses will encourage safe road crossings for motorized vehicles and encourage wildlife passage on uninhabited crossings. A recreational underpass would also meet the needs of hikers and bikers traveling on the Continental Divide Trail.

5. Aquatic passage and animal crossings. In many cases, culverts and underpasses can meet myriad needs. Fish passage structures can also be helpful to terrestrial species ranging from invertebrates and amphibians to smaller mammals. We recommend that the Howard Springs culvert be converted into a bottomless culvert, box culvert, or single span bridge to protect water quality, provide aquatic fish and amphibian passage, and to provide terrestrial passage for mammals.

6. Changing Human Behavior and Animal Detection Systems. One of the alternatives banks heavily on changes in human behavior by seasonally using variable message signs and an animal detection system. The Western Transportation Institute recently analyzed an existing state-of-the-art radar animal detection system in North Idaho on US 95 (Huijser, personal communication, 2017). The radar system is 74% accurate in detecting wildlife. Unfortunately, the system does not significantly change human behavior. Drivers did not slow down when the signs were flashing, indicating that wildlife was on the road, during the day, night, or in good conditions. The only time there was a modest change in speed was on winter nights when road conditions were poor. During these conditions, speeds were only reduced by 3-4 miles per hour, which was not significant enough to prevent wildlife vehicle collisions. Animal detection systems like this are recommended for further study and use in places where speeds are already reduced. Unless ITD designs and builds the Targhee Pass road with traffic calming or speed reduction measures in mind, we discourage ITD from relying on these methods to adequately address wildlife vehicle collisions and mitigation for wildlife connectivity.

Funding
We understand that infrastructure projects are expensive. Simply replacing road base without any significant changes to address other issues like recreational access, wildlife or level of service can cost millions of dollars. Given the longevity of road projects like Targhee Pass we encourage ITD to reach out and explore public-private partnerships for funding in order to fully explore and implement the best alternative. There are many examples of these across the nation including wildlife crossings in Wyoming, Washington, and Colorado. Recently, ITD District 3 received a $2.99M grant from the Federal Land Access Program to build a wildlife overpass on Highway 21. Targhee Pass aligns well with the goals of this program, and matching funds will be readily available.

Additionally, ITD has a ripe opportunity to be a leader in designing wildlife crossings while also bringing additional funds to the project. The Western Transportation Institute can often identify funds to construct wildlife overpasses, and more specifically, innovative projects that address reducing habitat fragmentation and increasing human safety. With three proposed wildlife crossings, ITD has the opportunity to try new designs and materials that might save millions of dollars and still effectively reduce accidents and increase connectivity. Landscape ecologists are realizing that many wildlife crossings are over-engineered to meet the standards of conventional bridges for transportation, while overpasses can be built using lighter materials, resembling green roofs more than concrete bridges. Other countries are experimenting with other materials that are lighter and less expensive, such as steel and recycled plastics. We recommend that ITD explore opportunities to use wildlife crossings and provide comparative research to learn more about the best materials, designs, and landscaping for wildlife crossings.

Finally, groups such as Y2Y and GYC are committed to helping raise additional resources that can make win-win projects like this a reality on US 20. We are happy to partner with you and begin to explore further private-public partnerships.

Ecological Consideration and Monitoring

We commend ITD for studying a range of alternatives that will meet the mission of ITD, the desires of the public, and the safety and long-term sustainability of wildlife. As part of any of these alternatives, we ask that ITD conduct significant pre and post construction monitoring that will inform the alternatives that you study and the effectiveness of the designs you choose.

Thank you for considering our comments. Please contact us if you have any questions on any of these ideas.

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| 39   | "Wildlife over-passes should be closed to the public and any other human activities and roads should not be on or near wildlife overpasses, as it will hinder wildlife use of the structure (Clevenger and Ford 2010)." pg. 107  
(copied from the HWY 20 Road Ecology report, one of your own TPP support studies)  
"Independent of the ecological resolution used, however, species-performance ratios were consistently negatively correlated with some measure of human activity. Therefore, the best designed and landscaped underpasses may be ineffective if human activity is not controlled." |
| 40   | Because of the controversy related to alternatives 2 and 4, an EIS will be required per the National Environmental Policy Act. |
| 41   | I have read two reports about human activity in the vicinity of wildlife overpasses and underpasses. One report is from Canada and the other is from Washington State. Both reports teach us that human activity in the vicinity has a very negative impact on animal usage of the over and underpasses. In the Washington State case, the Forest Service actually closed a campground in the area to reduce human activity. The influence of human activity is also documented in information provided by conservation organizations. For example, Beckmann-Roberts-Cramer wrote: "Wildlife over-passes should be closed to the public and any other human activities and roads should not be on or near wildlife overpasses, as it will hinder wildlife use of the structure (Clevenger and Ford 2010)."  
Curtailment of human activity in the Targhee Pass area of Island Park could threaten many existing activities. Consider that the snowmobile trail to Montana parallels Highway 20 from the Junction of Highway 87 to the Montana Stateline. This trail is used during the elk migration in December. This was evident during a tour of the area last December with Kathy Rinaldi, Kim Trotter, and Idaho Department of Fish and Game employees. Kathy took several pictures of snowmobilers using the trail. Would this trail be closed? Would the ATV trails in the area be closed? Would camping, snowshoeing, mountain biking, and cross country skiing be allowed? Would the Howard Springs Wayside be closed? In the extreme case, would hiking and photography be curtailed because of the possible negative influence of these activities on wildlife use of the over and underpasses? In a more extreme case, would human activities at Big Horn Hills Estates be affected? What about maintenance on the Fall River Electric Powerline and substation which is adjacent to Highway 20? Would cattle grazing be affected? IDFG has already indicated that changes to hunting in the vicinity of the over and underpasses will likely be made. As you can see, there are many things to consider. These over and underpasses come with "side effects" which must be considered by the public and decision makers. The devil is in the details! One of the devils is the extremely high cost to tax payers. |
| 42   | I’m in favor of wildlife passages, as many as can be installed. I believe they are the most effective way to reduce animal/vehicle collisions. I have friends and neighbors who work in West Yellowstone and take their kids to school there and I want the road to be a safe as possible for them and everyone who drives it. I live on hwy 87 in the 45mph zone, my living room and kitchen face the highway, and I see traffic exceeding the speed limit on a regular basis, some vehicles by as much as 20mph (estimated). I also know that animals are hit and killed on a regular basis (mostly deer, which are not reported but simply drug into the borrow pit, and some moose). Thus it is clear to me that 45 mph zones would not make the road as safe as wildlife passages would. I also have concerns about the gates that would be installed for access to snowmobiles (there are no 4-wheeler trail in the area). I fear that some of the people opposed to the passages would leave them open just to "prove" that they don't work. Are they spring loaded so they close automatically and who is going to keep them clear of snow? There are resident moose in the area so the gates would need to close all year long. |
| 43   | Re climbing lane. Do not do it the entire length of the road (4+mi). Reason is that if it goes the entire length, the merge at the summit is more hazardous than if the merge we half way down the hill (about at the Howard Springs or below). Will cause congestion MT side is 1 lane keep in mind at the summit is a road exit to snowmobile parking on E, as well as extremely popular (with the tourist) spot to stop, get out of the car, run across the highway to take photos at both signs, so it creates multiple hazards (traffic turning and people stopping for signs on the highway) - Having 2 lanes merging there is added driver distraction. More the merge further back. Only the 1st hill is where tracks are trying to get to speed!  
Second Point: I don't think a climbing lane is warranted at all (it would help reduce speed). Measure (study) the percent of trucks traveling Island Park vs the percent that turn west on 87, not 20. Additionally, the LOS modeling data that you showed at SWG 8/28 seems flawed. I talked to several people who say they can almost always drive the speed limit in summer and do not speed more than 30-40 percent of time following. I don't know how the modeling was done. I know my anecdotal info is extremely small sample, but the LOS grades five to TP do not seem based on my communities experience and we drive that road daily. How about going out and talking some actual measurements of speed. Finally, during winter months, any 3 lane road is essentially a 2 lane road in snow season. There is no 3rd lane. The winter corridor is 2 lane only so why bother adding a 3rd lane that won't even be available to drivers 4-5 month of the year.  
Third point: L turn lane at Targhee Pass - trail turn relook at  
Fourth Point: Reduce speed limits - it’s a scenic and winding road with lots of access - Reduce the speed limits. |
Rather than build in passing lanes so that traffic can drive faster than the already posted speed limit and usual 70 mph, why not design the road for slower speeds. Everyone says speed limits by themselves no not work, but if you build the road as a mountainous, curvy road, and post it at 45mph it would be much more effective at getting the drivers to comply with the posted limits. I particularly would recommend that this be added to alternative #3 where no overpasses are incorporated into the project, relying solely on driver modification methods. It would also make sense to not create the left turn lanes that naturally slow down traffic, and incorporate that concept into alt #3 as well. Sounds like and effective way to enhance the effectiveness of the driver modification methods, which research shows are only slightly effective by themselves. I wanted to comment on the Sheriff’s dept person who said there were 7 WVC’s on Targhee Pass YTD or last year, not sure of the time frame. My comment is that those were reports where the Sheriff had to be called out, i.e. the vehicle was disabled to the point it could not be driven. When large trucks hit an animal, they bounce it off the bumper and they do not stop. No report. There are also many minor collisions where an animal is struck and wanders off the road, a minor dent to the car, and the animal dies later. There are many more WVCs that occur than are reported on IDFGs website (I have not met a neighbor yet who says they report dead animals they see on the side of the road), and many more than the Sheriff has any report on. We should not be basing decisions on Purpose and Need (with regard to animal deaths or collisions) based on the Sheriff's numbers only. We should be compiling ALL methods of reporting and sightings of animals on the road and listen to the local anecdotal information from people who travel the road daily, as well as local wrecker/tow truck records, and refer to the original 2014 Seidler study to get a better feel for the magnitude of the problem. Sheriff’s data is only one piece.

First, I support, with wildlife passages, your Targhee Pass Highway 20 project. There should be at least two, one near the pass and one mid-way. Without these wildlife passages, just a wider highway 20 with more vehicles and a wider distance for wildlife to get a across in a wildlife migration area, will only result in more injuries to people and property, as well as loss of wildlife, which I consider avoidable significant adverse environmental effects that warrant a full EIS.

Second, if you propose an alternative with just a wider rebuilt highway, then, you should provide the public at the next step, the reasons why wildlife vehicle collisions and the associated injuries to people and property, and probably an occasional loss of human life, are not mitigated significant adverse impacts of this project.

1.88 million Visitors entered Yellowstone National Park thru the west entrance in 2016. They pay Idaho has taxes. They come from around the world to see wildlife. They stay in Island Park hotels and rent houses. They certainly buy gas and pay road taxes. Without them Island Park has no economy. Without wildlife they will not come.

There is data on how long cars are owned: Now over 20 years. So waiting for technology to detect animals is after all the animals are gone.

I believe the option of signage only is useless. With your 40 year modeling, I suspect that the actual number of animals killed would increase from the present numbers because the roadway will increase the number of lanes and the number of vehicles will increase not only from absolute numbers but also concurrent number of vehicles within any mile of traffic. Island Park, according to city reported data, had 89% of the homes as short term rentals in 2012. Fewer than 30 days occupancy rentals. That number is probably low for 2017. To ignore the actual users of the road, visitors who come to see wildlife in Yellowstone, seems like it is taking the economy of Idaho and Island Park the wrong direction.

Wildlife overpasses, as potential alternatives for Targhee Pass should be suspended from any further consideration and removed as potential alternatives in the ITD Targhee Pass Project.

The federal directives under both the Department of Interior, and the initiative supporting their inclusion in western state’s projects, have been rescinded on the federal level by President Donald Trump and Department of Interior Secretary Ryan Zinke. http://www.environmentallawandpolicy.com/2017/03/trump-zinke-orders-set-stage-review-federal-mitigation-policy/

On the state level, The Western Governors Association, has to every inquiry that I can search, apparently removed the wildlife corridor initiative from their current platform.

In their most recent definition of the role of states and federal partnerships the WGA have stated the following: “The reservation of power to the states and people respects the differences between regions and peoples. It recognizes a right to self-determination at a local level. It rejects the notion that one size fits all, and it provides for a rich tapestry of local cultures, economies, and environments.’

http://westgov.org/images/editor/Combined_State_Federal_Relationship___FINAL.pdf

At the local level, the Island Park Community and Fremont County elected representatives, do not support any transportation planning design component or vital road and bridge funding to be directed toward any wildlife overpasses or associated fencing and their future maintenance. Concerns have also been raised about subsequent land restrictions that will accompany any wildlife overpasses if they are built at Targhee Pass or any other location on HWY 20.
The new political reality of The Trump Administration rescinding and suspending all federal directives - leading to state and local actions - requires an immediate response within the Targhee Pass Planning process EA team. Upon announcement of the Trump Administration orders, all actions were to be identified and suspended if they are applicable to EO 3330, this remains to be done.

I recently raised this question, “why are we still considering wildlife overpasses in the Targhee Pass Project, given the new political reality?” In part, the answer was that the Trump and Zinke orders only applied to the energy sector. That is, in fact, not correct and I was encouraged to submit this information to the BioWest EA team.

Rob Ament, a regional conservation community leader wrote a paper in May of 2016 that explains how the now rescinded orders have been the source of (1) producing and applying science that supports these conservation goals, (2) using a landscape scale approach, (3) actively work to seek opportunity and then work to early integrate wildlife mitigation and migratory corridors into project planning and designs, and (4) to qualify them through the prism of conservation connectivity predicated on climate change stressors.

Mr Ament explains how the rescinded orders and abandoned WGA initiative DO APPLY to the Targhee Pass Project. Wildlife migration corridors and wildlife overpass solutions for mitigation are sourced to DOI-SO 3330-Sally Jewell. Wildlife overpasses over roadways are a vital ‘linkage tool’ within the larger ‘connectivity’ goal, and there are many science papers from within the conservation community that promote them. I will highlight 4 of his references. (copied)

* Secretarial Order 3330 (SO 3330): Improving Mitigation Policies and Practices of the Department of Interior. SO 3330 was issued on October 31, 2013 by Secretary Jewell.

The purpose of SO 3330 is to develop a Department-wide mitigation strategy. Central components include: “(1) the use of a landscape-scale approach... (2) early integration of mitigation considerations in project planning and design; (3) ensuring the durability of mitigation measures over time; (4) ensuring transparency and consistency in mitigation decisions; and (5) a focus on mitigation efforts that improve the resilience of our Nation’s resources in the face of climate change.”

The SO also recognizes the importance of connectivity conservation, “through the development of a comprehensive mitigation strategy, we can ensure that our national wildlife refuges, national parks, and other Federal lands and waters are managed for conservation purposes with sound stewardship and a commitment to conserve habitat and fish and wildlife migration corridors.”

*A Report to the Secretary of the Interior from The Energy and Climate Change Task Force. April 2014. This report was developed as a result of Secretarial Order 3330. It provides 10 guiding principles as the Department and its bureaus develop new landscape-scale mitigation policy.


The Presidential Memorandum gave direction to federal Agencies, “to avoid and then minimize harmful effects to land, water, wildlife, and other ecological resources (natural resources) caused by land- or water-disturbing activities, and to ensure that any remaining harmful effects are effectively addressed, consistent with existing mission and legal authorities.”

*A Review of Landscape Conservation Cooperatives by the National Academies. A prepublication was made available to the public in December 2015 with the final report slated to be released in 2016.

This report documents an examination of the U.S. Department of the Interior (DOI)’s Landscape Conservation Cooperatives (LCC), five years after their establishment. The LCC were an integral component of DOI Secretarial Order No. 3289, published on September 14, 2009.

...Landscape Conservation Cooperatives. Given the broad impacts of climate change, management responses to such impacts must be coordinated on a landscape-level basis. For example, wildlife migration and related needs for new wildlife corridors,... In its Review, “[t]he committee concludes that the individual LCCs can point to many early accomplishments, and have made progress toward the LCC Network’s high-level goals related to addressing conservation strategy, developing collaborative conservation, and advancing science for conservation.” Some of these efforts were in service to wildlife corridors and ecological connectivity.

Mr Ament is focused on the transportation sector. He has also written a report for the FHWA titled: ‘Development of Sustainable Strategies Supporting Transportation Planning and Conservation Priorities across the West.’
report speaks to ‘an opportunities matrix’ where wildlife data can be used to qualify mitigation alternatives into roadway planning. http://largelandscapes.org/media/publications/Development-of-Strategies-Supporting-Transportation-Planning-Across-West.pdf

He is a person who wears multiple ‘hats’. From his partnership relationship with the Center for Large Landscape Conservation he has helped author many papers. In fact, browse the entire library to validate the points I am making as they apply to ‘connectivity’, ‘wildlife corridors’, ‘mitigation solutions’ “wildlife overpass solutions’ and their inclusion into developing federal and state policies and projects.
http://largelandscapes.org/library/

Large landscape planning enjoys a very well developed private/public partnership in our region under the direction of the Great Northern Landscape Conservation Cooperative. Mr Ament and his fellow ‘conservation practitioners’ are intimately coordinating with the GNLCC. The GNLLC’s large landscape goals, emphasis on supported science and analysis, and the regional NGO influence have lent heavily toward developing conservation science and conducting inventory analysis of natural resources in our region. The GNLLC identifies our region as the High Divide and under its direction has been conducting an ecological connectivity pilot study of it’s own.
http://glnlcc.org/connectivity

Recently The House Natural Resources Committee sent Secretary Zinke a letter of concern with questions about efficiency, effectiveness and oversight of LCCs. In particular is the case of the Southern Rockies LCC, our neighbor, they raised concern about members of the steering committee directing monies back to their own NGOs. We encourage a look at the GNLLC toward the very same concern. ID Rep. Raul Labrador is one of the HNR committee chairmen who signed that letter, he has also announced his bid to become Idaho’s next governor, he has at least two important roles in our government to make an additional inquiry from those positions into this circumstance on behalf of Idaho, Fremont County and the Island Park Community’s behalf.
https://naturalresources.house.gov/uploadedfiles/05.03.2017_letter_to_zinke_re_csa.pdf

A partnership of public/private collaborators from the regional conservation community (NGOs), and state and federal agencies are now promoting the Targhee Pass wildlife overpass ‘builds’. Research will source them back to a very intimate collaboration with the GNLLC, ITD and IDFG on the HWY 20 studies, evaluations, and recommendations that have resulted in the first phase of ITD focus on Targhee Pass.
https://y2y.net/work/what-hot-projects/u-s-route-20

These prominent regional ‘conservation practitioners’ and NGO leaders have shared multiple steering committee chairs, have authored and co-authored papers together, have partnered in these studies, have shared same contractors in these studies and analysis, and have coordinated efforts with IDFG and ITD key personnel.

Wildlife overpasses and migratory corridor recognitions are a well established ‘want and desire’ of these select conservation community advocacies. While non-governmental organizations and a local master naturalist group from Island Park may have long enjoyed a public/private partnership/relationship with District 6 ITD and IDFG, these state agencies have not partnered with Fremont County, our other state elected representatives, or the impact population of Island Park, to design and embrace this concept as ‘a purpose and a need’ that we desire and support. A vital neglect is on the historic record for at least the last 4 years, the NGO community has intimately partnered with the GNLLC, while the Community of Island Park, local, and state representation has be excluded in that matrix.

It is also valuable to note that all of the ‘science’ written about in the many papers you can study for yourself in the aforementioned library, is principally founded upon ‘climate change’ as a principle stressor or catalyst that qualifies need for change. The Trump Administration has also suspended policy related to climate change science.

In summary, all of the federal and state ‘standing’ that is the foundation and catalytic ‘stressor” for including wildlife overpasses in the Targhee Pass Project is gone, and the Trump/Zinke rescinding orders further direct suspension of all activities sourcing to Secretarial Order 3330 (SO 3330): Improving Mitigation Policies and Practices of the Department of Interior. SO 3330 was issued on October 31, 2013 by Secretary Jewell.

The WGA has reinforced the importance of ‘local voice’, ‘it recognizes a right to self-determination at a local level.’ Local opposition to wildlife overpasses for Targhee Pass is on record.

Members of the Island Park Community, the Fremont County Commissioners, and Id. State Rep. Karey Hanks, have voiced serious reservations and do not support the expenditure of such significant funding for wildlife overpass alternatives announced by District 6 ITD at Targhee Pass. We have had only limited opportunities to express that sentiment and have had no voice in their inclusion in the alternatives from the very beginning of this process. Their inclusion is not sourced to any local-county or state request.

We have grave concerns about associated and required fencing, wildlife migratory corridor creations and the potential impact to
land use and the human livability environment that are currently being considered by ITD for HWY 20 future planning.

At our most recent meeting in Island Park, with the encouragement of other area stakeholders, Ken Watts of the Island Park Preservation Coalition requested an additional alternative be considered for the Targhee Pass Project which would address JUST NECESSARY ROADWORK for the HWY 20 travel corridor.

The FHWA and ITD must qualify their funding requests and purpose for highway projects upon ‘purpose and need’ criteria. How does continuing to include wildlife overpass builds at Targhee Pass qualify under this criteria? The incidence of WVC IN THIS 5 MILE STRETCH OF HWY 20 does not rise to the level that will quantify need, or the extraordinary funding allocation being proposed. Extrapolating national and international statistics and/or offering the excuse of under-reporting can neither be substantiated and is not an acceptable foundational science to qualify ‘purpose or need’.

This information requires that the TPP EA and Study Team immediately evaluate it relative to the current proposals.

The citizens of Fremont County and the residents of The IP Community seek a successful planning design. We have long desired and would welcome involvement in helping ITD to identify the true needs on our roadway and how best to dedicate our valuable highway dollars toward safer and more efficient travel on HWY 20.

Given that:
* 22 million dollars has been identified for 2021-22 budgeting which includes (3) wildlife overpasses,
* 2 alternatives being considered include the concept,
* suspension of consideration for them now is required by federal executive order and the WGA no longer hosts the initiative for wildlife corridors,
* there is local, county and state opposition to their consideration,
* valuable highway dollars are needed beyond work for Targhee Pass on HWY 20 which do qualify a much greater purpose and need for ITD to be considering. The 2017 travel season has seen human vehicle collision incidence and mortality (not involving wildlife) on other higher priority sections of the HWY 20 corridor.
* in totality, all of the given’s require suspension of all consideration of wildlife overpasses and a re-evaluation of this project.

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September 27, 2017

Dan and Andrea, (Langdon Group)

Today is the 27th of September, the public comment period for the Targhee Pass Project ends the 29th.

Fremont County residents and the Island Park Community are well aware that we will not have the time to offer, matching volume- in-kind, and substantive non-support counter to the wildlife overpass alternatives proposed in the Targhee Pass Project before the public comment period ends. Our limited opportunity for engagement has been carefully and deliberately determined and choreographed to allow for that result.

1. We wish to have placed into the record our concern over, and knowledge of the level of engagement, analysis and study participation, and project development involving multiple conflicts of interest, that several persons and non-governmental organizations as partners have had with ITD and IDFG resulting in the recommendations for wildlife mitigation and wildlife overpass proposals for HWY 20, including:
   * The Wildlife Conservation Society
   * Yellowstone to Yukon
   * The Henry’s Fork Legacy Project
   * Future West
   * The High Divide Collaborative/Heart of the Rockies Initiative
   * District 6 ITD
   * Idaho Fish and Game
   * Island Park Master Naturalists
   * The public outreach campaign which has had intimate years-long collaborative and unchallenged opportunity to influence this project giving them the tremendous advantage of a significant partner/project development role with ITD, long before the structured public engagement began in December 2016. This is a completely compromised process and contains multiple conflicts of interests within it.

2. Documentation
This is a compilation of the work behind the private non-governmental partner’s role in this and to see it/read it, listed in their own libraries is impactful.

Wildlife Conservation Society
https://programs.wcs.org/northamerica/About-Us/Publications/Categoryid/166.aspx

Center for Large Landscape Conservation
http://largelandscapes.org/library/

Yellowstone to Yukon
https://y2y.net/publications/reports

Western Transportation Institute
https://westerntransportationinstitute.org/programs/road-ecology/

b. FEDERAL-STATE-PRIVATE PARTNERSHIP - ECOLOGICAL CONNECTIVITY

Running concurrently with both the ecology study and the safety solutions study, was the ecological connectivity pilot of the GNLCC. The safety solutions study credits Michael Whitfield. Whitfield, Tabor and Servheen are all steering committee members of the GNLCCN, directing federal funding and the ‘science’, submitting and accepting proposals through a network and partnership between federal-state-and non-governmental organizations. The WCS is the common contractor between the GNLCC ecological connectivity pilot and ITD, WTI is the common contractor between GNLCC-Western Gov. Association-Servheen and IDFG, all culminating and converging their efforts to support the wildlife overpass alternative on HWY 20 appearing to be presented at the local level by ITD and IDFG. There is much more behind this than state agency recommendations, they are the tip of the spear-the implementation.

https://www.sciencebase.gov/depth/#/show/55119ae6e4b02e76d75b516b

3. NGOs and Timelines in Fremont County and Island Park.

a. The Island Park Safe Wildlife Passage Campaign (IPSWPI)

The private/public partnerships that have been intimate with ITD, have had at least the 3 past years to collaborate in the development of the current HWY 20 planning proposals. Prime examples of this are:

b. They were partners in the 2014 and 2011-2015 Studies that support the (1) road ecology evaluation and the wildlife overpass (2) safety solutions being recommended for multiple phases of the HWY 20 travel corridor, resulting in the campaign initiative to promote Island Park Safe Wildlife Passage that launched in early 2016, and to have the intimate influence to have the alternative included in the Targhee Pass Project and future phases of work on HWY 20- Ashton Hill to the Idaho Montana state line obviously before the local public knew that any highway project was even being planned for Island Park.

c. The Henrys Fork Legacy Project, which hosts the IPSWP initiative, had organized in 2013 and was forming partnerships, who are credited in the studies (2014, 2011-2015) that recommend wildlife overpass solutions.

d. Y2Y had made the announcement about their involvement and their campaign partnering with ITD in January of 2016 on their own website.

e. The Y2Y official public campaign began in July of 2016 at Harriman State Park, hosting a viewing of ‘The Wild Ways” film they promote and asking for support of the concept in our region.

f. Throughout that early time period-through to the current date, the IPSWPI campaign has built a support base and solicited positive comment for it.

g. Y2Y was also sending out information about, and soliciting positive public comment for wildlife overpass solutions to ‘Friends’ of Island Park Safe Wildlife Passage before the December public meeting.

h. While multiple ITD remarks have credited the source of public support for wildlife overpasses to that December 2016 meeting with the local Island Park Community, that is not correct. The support comment campaign can be sourced in majority, to dates representative to the time period before the local public was informed of the wildlife overpass alternatives
i. The following (in blue) has been copied from my files.

"Dear friends of the Island Park Safe Wildlife Passage Initiative,

On Thursday, December 15, the Idaho Transportation Department (ITD) will be hosting a public meeting regarding the Environmental Study on Targhee Pass. This is the first public meeting regarding ITD’s and the Federal Highway Department’s plans to expand and straighten US 20 on Targhee Pass between US 87 and the Montana state line. Please widely share the attached press release and flier.

This is a great opportunity to let ITD know your thoughts about the importance of safe wildlife passage across the Continental Divide in and out of Yellowstone National Park! Comments will be accepted until January 15, 2017.

Kim Trotter"

This email from Ms. Trotter, contained an attachment of a news release dated 11-30-2016 sent out by Adam Rush of ITD, informing the public of the upcoming meeting.

j. The local and larger public first learned of ITD's interest in HWY 20, at that meeting in December 2016. At this initial meeting with the local public, the wildlife overpass alternative was not revealed, but the NGO interests partnering with ITD and who are now advocating for it, and whom we now know have very much to do with the alternative now being considered in the project, were present at that event, and yet said nothing of their involvement or intended initiative.

k. ITD was also fully aware of this collaboration, they were a partner in it, yet ITD said nothing at that time as well, to either inform or alert The Public that they serve, of either their collaboration with Y2Y, or ITD's intention to consider wildlife overpasses on HWY 20.

https://y2y.net/work/what-hot-projects/u-s-route-20

5. FOR THE RECORD

a. It was not until the end July 2017 meeting in Island Park that the overpass alternative was first revealed and presented to the local public and impact population.

   Clearly Kim Trotter, Y2Y and the IPSWPI campaign had prior knowledge and opportunity to impact the Targhee Pass Project.

   Please reference the dates that you have received positive comment and requests for this alternative to be considered, the advantage will be obvious. Also please reference the pre-planning meetings and emails before December 2016, you will find that Kim Trotter/Y2Y will be included and present.

b. NO REQUEST FOR THE WILDLIFE OVERPASS SOLUTION TO BE INCLUDED IN THE HWY 20 TARGHEE PASS PROJECT HAS COME FROM EITHER THE COMMUNITY OF ISLAND PARK, FREMONT COUNTY, OR REGIONAL ELECTED IDAHO STATE REPRESENTATIVES.

c. At the July 2017 meeting, Y2Y national director Kim Totter, who is also the IPSWPI campaign chairwoman, along with ‘specialist’ Renee Siedler presented a fully developed proposal and hosted a presentation station on wildlife overpasses for Targhee Pass.

   It was at this July 2017 meeting in Island Park that The Public was FIRST INFORMED of the proposed overpass alternative, and yet it was being presented as a fully developed alternative in the project. The IMPACT POPULATION and ISLAND PARK COMMUNITY/FREMONT COUNTY had no prior knowledge of, nor had we taken any part in it’s development, this was our first official introduction to the concept.

   Where did that come from?
   What ‘process’ introduced wildlife overpasses to ITD?
Who made the determination that the concept would be included in the Targhee Pass Project?

**PLEASE NOTE FOR THE RECORD** that the July 27th meeting had been broadcast to the community as our FIRST opportunity to offer ITD our thoughts and considerations toward roadway improvements and necessary upgrade alternatives. Nothing had ever before been suggested by ITD that included a complete re-design of the Targhee Pass roadway section, and certainly had not mentioned the introduction of a 22 million dollar/3 overpass proposal. The ITD/HWY 20 website did not inform The Public of that concept proposal **before that meeting**, yet when we arrived the presentation was prepared and presented.

**d. Renee Seidler**

Ms. Seidler was already familiar to some of us attending. She had recently been hired as a contractor to IDFG for the Targhee Pass Project. Research proves she was not new to HWY 20 analysis, she had already been involved with analysis and study of HWY 20 through her work with the Wildlife Conservation Society 2011-2015. Her hire as a contractor for the Targhee Pass Project was therefore, highly suspect.

That concern was validated by her work evidenced in the completed - multiple wildlife overpass project at Trapper’s Point-Alpine, Wyoming (Path of the Pronghorn). The same principle persons and organizations are attempting to ‘replicate’ that project here, a precedent encouraged by Gary Tabor, Center for Large Landscape Conservation and steering committee member of the Great Northern LCC.

What has manifested itself as a high level of ‘outside development’ has now been incorporated inside of the current ITD planning process, and has been ‘in the works’ for a very long time. Federal grants have supported it. Public private relationships have formed and collaborated with deliberation in the ‘science’ that has led up to the current wildlife overpass project alternative.

6. **NEPA**

The Targhee Pass Project invites NEPA challenge. In the **first** regard, as to the conflict of interests involved, and **second**, the compromised public participation that has occurred. **Third**, as to the proposed project itself.

Clearly neither a Class II CE, or a FONSI can be arrived at, because of the elements of Class I. This project should immediately move to an EIS if it continues on the current schedule to include wildlife overpasses.

NEPA Class of Action Definitions 23 CFR 771.115

Class I – Environmental Impact Statement (EIS)

- New major capital projects
- Projects with substantial public controversy
- Projects with significant, unavoidable adverse impacts
  - Class II – Categorical Exclusion (CE)
  - Projects with none to a few minor impacts
  - Often entirely within existing transportation right-of-way
  - Typically no public involvement required


7. **BioWest** - While BioWest has expressed the desire to have the EA result in a FONSI or a CE, NEPA direction speaks otherwise.

   **a.** BioWest’s involvement in the 2014 safety solutions study and their website hosting of the study also invites into question their neutrality and possible conflict of interest in running the EA for this
Although the study now appears on the HWY 20 Study website, the original was hosted and still appears at BioWest, that is where we first found it.  

Please include this correspondence, along with all of the other comments I have submitted into the public record of the Targhee Pass Project. I would also appreciate it if you would forward a copy to BioWest/Andrea Moser.

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GREAT NORTHERN LANDSCAPE CONSERVATION COOPERATIVE (GNLCC)

Yvette Converse (USFWS, Coordinator GNLCC) GNLCC power point slide reflects the amount of money that has been invested by GNLCC to implement their agenda since its inception.

[Image: GNLCC Investments]

GNLCC report graphic: activities directed to /through the Crown of the Continent and Y2Y (Tabor and Trotter) and the High Divide Collaborative/ Heart of the Rockies (Whitfield) directed funding for the following: (interesting to note both Tabor and Whitfield sit on the GNLCC steering committee and are directing funding to their own initiative projects) as seen above.

Michael Whitfield-Heart of the Rockies-High Divide cover graphic of the GNLCC Ecological Connectivity Project in 2015.

[Image: The GNLCC Ecological Connectivity Project]

Here is the link to the above graphic  
Michael Whitfield and his initiative/collaborative in the region they identify as the High Divide, was concurrently working on targeting US 20 and Targhee Pass for mitigation and connectivity in 2013-2015. The following graphic from their preliminary report validates their focus. Re-state, Whitfield as is also on the GNLCC Steering Committee.  
http://greatnorthernlcc.org/sc-at-membersOLD

The above graphic is on page 13 of this link. HWY 20 and 87, corridors, connectivity, and collaborative work with state agencies is mentioned. 
ISLAND PARK SAFE WILDLIFE PASSAGE INITIATIVE (IPSWPI)

IPSWPI WAS LAUNCHED BY Y2Y in January 2016

IPSWPI is the front for the Y2Y agenda. Kim Trotter, Y2Y National Program director, is the chair of the IPSWPI.

http://magicvalley.com/lifestyles/recreation/group-seeks-wildlife-crossing-in-island-park/article_5f1ae95d-42f5-5fd8-a434-8796e955bf0d.html

Kim Trotter is running her Y2Y agenda through IPSWPI in an attempt to make it look like wildlife passages are a locally driven idea. Kim Trotter recruited a small group of people to support IPSWPI and to participate in the HWY 20 analysis, all of which was unknown to Island Park residents. These are the individuals who have submitted comments to ITD in support of wildlife overpasses.

The graphic is interesting. It was posted by IPSWP regarding Targhee Pass proposed project in June 2017. It appears to be an ITD document, it is not.

You will note the date is before the first public open house was held December 15, 2016. Ms. Bjerke, of the IP Master Naturalists, has been intimate to the IPSWPI and comments regularly on their FB pg. as well as in the IP News in support of the wildlife overpasses. This is an early posting on the social media site. At this time you will note that ‘safe passage’ is not the focus. The focus was on connectivity in and out of Yellowstone and the corridor effort of Y2Y, a direct admission that the two are synonymous, made by a person who is a leader in the effort and has intimate knowledge of the IPSWPI campaign.
When this was challenged it was changed to the document below, and it was acknowledged that it was created by Y2Y. How did Y2Y and the Island Park Safe Wildlife Passage Initiative know this information prior to the July 27 ITD meeting?

Y2Y has been working with ITD since before August 19, 2016 on IP overpasses. Go bottom and click on link Safe Passage for Wildlife in Island Park, August 19, 2016.

https://y2y.net/work/what-hot-projects/u-s-route-20
https://www.roadsbridges.com/roadsbridges-idaho-project-map-wildlife-over-us-20-comes-fruition
https://y2y.net/work/what-hot-projects/u-s-route-20
First looking at Project 14054, there is nothing there about wildlife overpasses, it is a proposal for road reconstruction found on the link below.


However, the IPSWPI people were very aware of it, and Y2Y was also aware of it. Trotter had been working with ITD and the P. Cramer study 2014. ITD shows the posting for Project 14054 as June 28, 2017, yet the above graphic was from July, 2016. The IPSWP seems to have prior knowledge of this project before it was even posted for the public and is soliciting positive comment for safe wildlife overpasses to front-load them into the project before it was even announced.

ITD again posted Project 14054 again on November 14, 2016, IPSWPI was promoting their initiative and soliciting comment, again there was no mention of overpasses in either document, just road improvements. Because of their prior involvement and information being passed to them, and with only 30 people attending the December, 2016 meeting, all positive comments requesting overpass consideration can be sourced to the IPSWPI and Y2Y campaigns. The local public and impact population of Fremont County and Island Park had no prior knowledge or involvement to offer positive or negative opinion...they had not been informed.

Y2Y/IPSWPI knows how many comments were submitted during scoping, this information could only come from ITD. Why has this information not been shared with the public? The ITD website for information on HWY 20 and a first phase plan for Targhee Pass was not even posted until late January - early February, 2017.

The April ITD meeting was cancelled.

In June, prior to that meeting IPSWP was informed/present at a field trip/viewing experience at Trappers Point, Wy. It will be at the upcoming July 27, 2017 ITD public meeting in Island Park that THE PUBLIC WILL FIRST LEARN OF WILDLIFE OVERPASSES AS A COMPLETED ALTERNATIVE FOR THE TARGHEE PASS PROJECT. ITD, IDFG and the IPSWP are obviously well ahead of any public involving or knowledge.
BIOWEST


The EA was started without any public involvement which is required by NEPA. The IPSWPI posted the above graphic on June 28, 2017 prior to any public meetings. This post states ITD posted the EA the previous year, 2016.

In summary, this is a completely compromised process, involving multiple conflicts of interests, and invites serious NEPA challenges should it continue on the present schedule. In collaboration with each other, these groups have been working together in the same timelines with ITD before ITD ever brought it to the public.

Over the past months several concerned citizens have submitted comments, raising serious concerns, and have raised substantial questions which have never been answered. When will you address these concerns?

Please include this as a graphic evidence to the comment I most recently submitted for the official record of comments received on the HWY 20/Targhee Pass Project and wildlife overpass alternative.

It speaks to an early posting, before any challenge to wildlife overpasses had been mounted, when IPSWPI was speaking to-and soliciting positive comment from the campaign’s target audience. It also speaks to the true agenda of Y2Y, manifest through the banner of another name, and the tremendous head-start they had on front-loading comments to have overpasses considered on HWY 20.

Note the date 6-10-16, this is more than 6 months before the first public workshop will be held in Island Park and the ITD news release from Adam Rush will be issued informing the public of the upcoming December open house (11-30-16). The impact population, Fremont County, and the larger community of Island Park had been informed of nothing, had had no involvement in bringing wildlife overpasses and migratory corridors to Island Park. ITD had announced nothing, and only a very small and select group of supporters were promoting this message or had knowledge of any project being considered for HWY 20 by ITD.
The volume of front-loaded comments cannot be over-emphasized, this comment campaign should be credited for why the concept of wildlife overpasses is even being considered by ITD. (aside from the P. Cramer-T.Cramer-Y2Y safety solutions study...oh wait...thats Y2Y again isn’t it?) and the Henry’s Fork Legacy Project ‘flagship project’ effort-Island Park Wildlife Passage Initiative (pause...wait...thats Y2Y) too.

No matter how many times they re-constitute or multiply themselves under new names...it is the same agenda being pursued by the same core group of known members from our region’s conservation community in numbers I can count on my two hands. They are hardly a representative majority, and many of them are not even residents here...or of this state.

This post provides verification that the overpasses are a vital component for ‘linkage’, connecting Yellowstone to conservation lands, and their role in creating wildlife corridors. It also suggests that this campaign and initiative is intimately working with ITD to achieve the goal that overpasses are included in their future work for HWY 20. This fact has been validated in every comment I have submitted on The Targhee Pass Project.
53 My family has had property at Henry’s Lake for nearly 50 years. I have visited the family cabin numerous times and seen the increase in traffic on 20. My understanding is that Yellowstone park visitation has increased 98% over these same 50 years increasing the strain on the wildlife population on the roads leading into the park. I would like to see animal overpasses built as part of the proposed improvements for Targhee Pass to allow for natural migration and hunting terrain for the wildlife, and to protect humans for damage and harm caused by accidents with animals.

Also I would suggest a turning lane for Targhee pass trailhead - or at least better signage to improve traffic flow and trailhead access.

Thank you for your consideration of my input.

54 Hello, I was not able to attend last meeting, but have some new observations and questions. #1 are they only going to install safe passages at Targhee Pass? #2 I was recently speaking to Chris our Fish & Game officer for Island Park and we are both in agreement that the most Wildlife kills are in the middle and southern part of Island Park, Federal Hill, between Last Chance & Ponds Lodge, Antelope Flats, south end of Swan Lake and Ashton Hill. Chris said he is the one that picks up the kills and its his observation of much more need for Passes in lower Island Park then Targhee Pass. I have observed more in that area also, but I don’t travel Targhee Pass as much so have not made comment until now. Also the Flats around Henrys Lake had a lot of Kills last year and year before, have not seen very many this year, but also see very little wildlife in that area this year, no deer and only a hand full of Antelope where two years ago there were at least 50 or more on the Flats around Henrys. So please contact Chris at Fish & Game for his input and I will ask him to try send contact Targhee Pass study group. We also think most happen at night and I think a lot would be saved if Truckers were routed to I-15 other then local deliveries, the big trucks use 20 as a thoroughfare and it wouldn’t take them much time to go over to I-15 instead of using Highway 20 they also damage the roads this highway has a very very heavy amount of semi truck traffic you drive over and I-15 there’s none over there at all there’s also no weigh stations here on Highway 20.

55 I support Alternative 2 for the Hwy 20 improvements being implemented by IDOT. I think our number one priority is safety, for both cars on this highway and the wildlife attempting to migrate across it.

Seeing the projections for the increased growth in our area, along with increasing visitors, I believe that wildlife crossings are needed in the Hwy 20 project to keep both people and wildlife safe. The safety of the cars traveling on this important route should be paramount. Truck traffic should move to Hwy 15 which is a better road for them, and where they belong. Wildlife is a community value worth protecting. Wildlife is what many of our visitors come to our area with the hope of seeing them. There is an effect on wildlife migration as more and more cars travel through our town, making our roads busier and busier. Now is the time to do something about collisions. Let’s be forward thinking, and put in wildlife crossings while road work is being done. It just makes sense. This is an investment in our future, and our grandchildren will thank us for it.

56 Sunday my husband and I were walking in the woods north of us, between E. Harriman (the part of Harriman S.P. that is east of the Hwy 20) and Hwy 20. We come across a bull moose sitting the woods, and when it saw us, it got up very stiffly and walked away. We quickly kept walking as we didn’t want to disturb it. That late afternoon, we came across it lying in the river, just up from the boat launch on Wood Rd, it’s head barely above the water. It did not look good. We called a friend of ours who works with Chris Johnson and the bear project, Kenny, who called IDF&G. Kenny walked out to look at it and also thought it looked like it was dying. The next morning, Monday, it had moved, and reports from others that day saw it trying to get up, and collapsing, several times. IDF&G came out but could not do anything, as it was late when they got there and it was far off the road. On Tuesday morning, Sept 26th, they found it in Fish Creek, submerged, dead. They determined it had been hit, most likely on Hwy 20. It had a compound fracture in it’s back leg, along with internal injuries. They spent five hours pulling it out of the water and into their truck, as it would not be good to cut it up there by the river, with fisherfolk and hikers nearby. So the moose suffered for over 48 hours.

My point in telling you this story is that when people claim there are not that many animals hit on the highway, they overlook the number of animals that are injured, some fatally, but make it off the highway into the woods. Then these animals suffer an agonizing death, but usually out of our sight. We need to do something. We need wildlife overpasses. We need safe wildlife passages from Sheep Fall past Harriman State Park. Many animals cross the highway between Harriman S.P. and E. Harriman. Last fall we saw evidence (along with a downed elk that had been hunted, legally, off of Hwy 20) of an elk herd that regularly crossed the highway to go to the forest on the other side of the river. They would cross 20 in the morning, and in the evening cross back to go to Harriman SP. I hope you realize that that area is a migratory route for many animals, along with Targhee Pass.

57 First I own multiple properties in the Henry’s Lake area. I purchased my first property there over 25 years ago. For the past 17 years, I have lived on one of those properties for a period of 5 to 6 month each year. For at least 20 years prior to that I worked and recreated in the area.

I am very happy that multiple highway improvements and safety issues are being addressed in your proposed alternatives. Over the course of the roughly 47 years that I have worked, then lived in the area, I have had one vehicle encounter with a moose (in a 45 mph zone) and my wife had a vehicle encounter with a deer. We have also had two near vehicle encounters with bears. I can attest
that simply reducing speed limits will not eliminate vehicle-wildlife collisions as some suggest. Based on our many years of driving this road, our encounters with wildlife, my wife and I strongly support Alternative Two as the best choice to address improvements and safety issues. Our support for Alternative Two is conditional on maintaining continued access to surrounding lands and ensuring funding for future fencing maintenance will be available.

Finally, through our travels we have become familiar with similar wild-life fencing projects in Wyoming, Nevada, and Montana. As far as we can determine, these fences have not impeded wildlife migrations and they have substantially reduced vehicle collisions with wildlife thus improving over-all travel safety and saving wildlife.

Please include the following comments in your consideration:

I favor Alternative #2:

- Three wildlife crossing structures
- Fence entire project corridor length that includes:
  - Wildlife escape ramps
  - Raised swing gates for hiking/fishing access
  - Gates, electric mats and/or detection/warning systems at vehicle access points
  - Fence end treatments (wildlife guards, electric mats, fence end returns, boulder field, driver awareness signs)
  - Possible culvert or other snowmobile crossing near top of pass/state line
- Possible continuation of fence on Montana side of Targhee Pass

My second choice would be Alternative #4, then #3.

We strongly support Alternative 2 for the Targhee Pass environmental assessment. Alternative 2 would provide the greatest and most reasonable safety measures for wildlife, bicyclists/pedestrians, and motorist. Because of the important nature of Highway 20 through this area being a major transportation corridor for both wildlife and human transportation, and not just a local transportation issue, extra care must be taken to design and build the safest options possible.

MY HUSBAND AND I ARE FULL TIME RESIDENTS OF ISLAND PARK. WE HAVE LIVED AND WORKED IN OUR CITY FOR OVER 25 YEARS. THIS IS OUR HOME BECAUSE OF THE WILDLIFE, ENVIRONMENT AND LIFESTYLE. THIS IS ALSO THE REASON ALL THE WEEKEND/TOURIST FOLKS CHOOSE TO COME HERE. WE MUST PROTECT THE VERY ELEMENTS THAT MAKE THIS THE SPECIAL PLACE IT IS!!! IT IS OUR RESPONSIBILITY TO PRESERVE IT! In light of Idaho Transportation Department’s request for public feedback on the Idaho Transportation Investment Program, I would like to share my comments. As Idaho plans for the next generation of highway projects, it is of utmost importance to address the safety of humans and wildlife in the planning process. I commend you for your projects that specifically note improved fish and wildlife passage, and request that in areas where wildlife are often near or on roads that you design and fully fund appropriate wildlife crossings.

I am particularly interested in the extensive expansion and maintenance proposed along US 20. Iconic animals such as elk, moose and grizzly bears must be able to safely cross roads such as U.S. Highway 20 near Yellowstone National Park. I value the ways wildlife positively impact Idaho's economy, cultural identity and way of life. I am also concerned for people's safety. By facilitating the safe passage of wildlife, you will also ensure increased safety of the many people who drive US 20 each day. In 2016, ITD completed a study that recommended wildlife solutions on Highway 20, including slowing speeds, fencing, and overpasses and underpasses. As ITD looks to significantly expand US 20 through Island Park, I ask that you implement these recommended solutions, including overpasses and underpasses from Ashton to Dumpground Road (Key#19711), at Sheep Falls to Pinehaven (Key# ORN20379), Pinehaven to Buffalo River (Key# ORN20382), Targhee Pass (Key# 14054, 19913), and State Highway 87 north of Henry's Lake (Key#19969). Wildlife under- and over-passes, speed reductions, and fencing need to be key components of your project plans, as they have been proven to greatly improve safety for drivers and animals.

Thinking about highway safety and wildlife-friendly alternatives before design makes sound economic and project management sense, and I trust that the Idaho Transportation Department will do everything in their power to ensure the safety and continued prosperity of wildlife and people in the region.

I prefer alternative 2, which includes the most wildlife crossings. Possibly, each crossing could be designed for different animals, for example, grizzly bears, elk, moose and deer prefer wildlife crossings that are high, wide and short in length, including overpasses; mountain lions and black bears prefer long, low and narrow crossings (https://y2y.net/work/how-protect-connect-inspire/transportation-folder/wildlife-crossing-structures-and-fencing). I wondered if the proposed wildlife fencing along the highway was too long, but a 2016 paper found that fenced road sections > 5 km typically reduced large mammal–vehicle collisions > 80%. (http://www.sciencedirect.com/science/article/pii/S0006320716300350).

First, I want to thank ITD and the Landon Group for their joint efforts to include the public in the planning for the Targhee Pass project. While seeking public comment is standard procedure for most (if not all) road projects, your continued efforts for this project have been exemplary. Thank you.
The purpose of this letter is to provide comment relative to the four alternatives presented via the NEPA process for the Environmental Assessment for this project. In previous letters I have advocated for a reduced speed limit (45 mph, day and night, year round) and the elimination of pass-through semi-truck traffic on Highway 20. While some may question whether reducing speed limits really reduces accidents (published data are mixed), no one can argue that eliminating large truck traffic will not make passenger vehicle driving on Highway 20 in the Caldera less anxious and, consequently, safer. I recognize that neither of these alone or in combination will eradicate the problem of wildlife-vehicle collisions: but they are certainly a low-cost step in the right direction.

That being said, the literature clearly shows the best solution to improving safety by reducing collisions with wildlife is over or underpasses. Consequently, I strongly support Alternative 2 with the three wildlife crossings. I do, however, have some suggestions to make this an even better alternative.

The climbing lane seems over engineered. Is there not an easier solution? At certain times of the year, the project area is heavily used by recreationists. Safe passage for them should be included in the design. All creek crossings should include bottomless culverts or other effective designs to facilitate fish passage. Targhee Creek access should include a turning lane.

ITD is in a unique position to not only improve traffic safety on Highway 20 and Targhee Pass, but by including safe passage structures for wildlife and recreationists, will demonstrate to the one million plus vehicles traveling this road to Yellowstone National Park that ITD recognizes the value of wildlife in the Greater Yellowstone Ecosystem and is willing to take bold steps to reduce wildlife-vehicle collisions.

Thank you for considering our comments on the alternatives for the Idaho Transportation Department’s Targhee Pass expansion project on US-20. Since 1973, the Idaho Conservation League has worked to protect Idaho’s clean water, wilderness, and quality of life. As Idaho’s largest state-based conservation organization, we represent members who live near or who occasionally travel through this area and who are interested in improving public safety, transportation infrastructure, and protecting wildlife.

This project is not just an opportunity to protect human life and safety or individual wildlife, but also preserve the ecological integrity of this greater area. The future of healthy wildlife populations in this area – as well as the economic and ecological processes that rely on them – will increasingly depend on safe and accessible passage across US-20 for wildlife.

As such, we recommend Alternative #2 which includes three overpasses for wildlife and all the other improvements. We also recommend reducing vehicle speeds through this area to further reduce the risks of collisions with wildlife. We also support the development of underpasses for recreationists. Please keep us on the mailing list for all updates regarding this project.

Targhee Pass is scheduled for improvements including passing lanes and replacing the pavement. This is obviously needed and within the scope of the Idaho TRANSPORTATION Department funds, which are to be spent on ROADS and BRIDGES. The legislature passed a gas tax increase a few years ago to address our aging infrastructure. This is what our Idaho citizens expect to see, not some animal overpasses that are unnecessary and a blatant misuse of transportation dollars.

I had an additional thought after looking at the wildlife fences installed in the Pinedale area. The fences are very tall and include wire netting. This wire netting would be very hazardous to sage grouse and grouse of all kinds because they fly low to the ground. It could also be hazardous to hawks, owls, and other raptors as they hunt for prey on the ground.

My conservation friends have pointed out that ranchers fences (simple 4 wire fences) can lead to the demise of sage grouse. 10’ tall wire net fences would be much more destructive to our feathered friends.

Maybe this comment has already been made but I believe that it is a significant environmental issue that should be considered. It is quite possible that the fence will kill far more critters than vehicles and therefore will have a negative impact.

1. An EA requires public involvement from the moment a potential project is identified. ITD has not involved the public by scheduling meetings in the dead of winter with difficult travel conditions, and when the majority of IP is not in residence.
2. It is clear that from the beginning ITD has aligned itself with conservation initiatives locally (HFLP), and with national initiatives such as the Y2Y.
3. It is clear ITD has been moving forward with plans to integrate only one wildlife mitigation solution as promoted by these groups, underpasses.
4. Required Tribal involvement has been significantly omitted.
5. No consideration has been given to the social, economic, or environmental impact in the studies that have been conducted, yet now they are bringing in a road ecologist whose background is overpass, corridor, and connectivity objectives, what does that say?
6. Examples of overpasses being used are not comparable to the geographic area in IP.
7. Do not put overpasses in
I am writing today to commend you for considering alternatives that intend to protect the wildlife in Island Park and Yellowstone National Park. Studying alternatives that include wildlife crossings is unprecedented in the state, and is a courageous step to do the right thing.

Reviewing the materials and reports on Idaho Transportation's website, I suggest ITD implement the recommendations published by a contractor in the report titled Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87, that call for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. It has been shown elsewhere in North America that wildlife crossings are a successful yet cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife. Further, it allows these animals to move, eat and mate safely. I commend alternatives that include crossings.

In addition, I would like to request the following:
- That ITD consider lower speed limits on this stretch of U.S. 20. This is in line with what members of the community of Island Park have requested.
- For any plans to incorporate wildlife fencing to further reduce vehicle-wildlife collisions.
- To shorten the proposed passing lane to two miles, with a dedicated turning lane for Targhee Creek.

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I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife, which add to our local economic prosperity.

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Island Park residents and visitors deserve a safe highway. Your efforts in creating one are appreciated.

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I don't have the opportunity to drive this route as much as I used to, which was couple times per week. But I do have 3 Son's who have been able to maintain a very good construction firm for the past 2 decades which constitutes using this venue of Island Park each and every day along with their employees. So this note is to include them also on this count and statement.

I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife, which add to our local economic prosperity.

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My family has recently taken a road trip from Calgary, Alberta through Montana and Idaho and to Yellowstone National Park. It was an amazing trip for all of us to see so much beautiful country and wildlife. We, as Canadians, are familiar with issues such as wildlife crossings and in Banff National Park for example we have built quite a number. They are enormously successful and beneficial to both people and wild creatures. Please consider the following:

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I am from Colorado, but visit your area often to spend time with friends. In Colorado we have had great success with wildlife crossings.

I know this is unprecedented in your state, and is a courageous step to do the right thing for the safety of drivers and wildlife.

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Thank you for your consideration on this matter.

88 Thank you for your attention on selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. I commend you for studying alternatives that include wildlife crossings — an unprecedented move in the state, and a courageous step in doing the right thing for the safety of drivers and wildlife.

I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife, which add to our local economic prosperity.

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Thank you for your consideration on this matter.

90 Having just returned from a visit to Idaho, and having seen at first hand the impact of US20 on wildlife, and in turn, the impact of wildlife on safety along US20, I am writing to thank you for selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment and to urge you to continue on this path. Studying alternatives that include wildlife crossings is unprecedented in the state, and is a courageous step to do the right thing for the safety of drivers and wildlife.

I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife, which add to our local economic prosperity.

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- Reduce speeds to less than 45 miles per hour from SH 87 to the Montana state line.  
- Shorten a proposed passing lane;  
- Install a turning lane to the Targhee Creek Trailhead.  

Residents and visitors support and need a safe highway. I appreciate your efforts in working towards that goal.  

Thank you for considering my views. |
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Thank you for your consideration on this matter.

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I appreciate that you’re taking the time to collect public feedback on safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. Thank you for studying alternatives that include wildlife crossings — this option offers a win-win solution for animals, drivers, and ITD alike.

I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife, which add to our local economic prosperity.

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Thank you for your consideration on this matter.

112

I am taking the time today to ask for wildlife passages for U.S. Highway 20. As a visitor from British Columbia, I depend on these roads to be safe, and more importantly to provide safe ways for the wildlife in your beautiful area to continue to thrive and enjoy their lives in safety. Thank you for your attention on selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. I commend you for studying alternatives that include wildlife crossings — an unprecedented move in the state, and a courageous step in doing the right thing for the safety of drivers and wildlife.
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Island Park residents and visitors deserve a safe highway. Your efforts in creating one are appreciated.

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After driving through Banff Natl Park in Canada, my husband and I were extremely impressed with the measures taken there to protect both wildlife and motor vehicle passengers from injury or death due to wildlife on the roadway. Not only is their method effective, it is extremely attractive. Surely we in Idaho can be as proactive as our Canadian neighbors.

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Island Park residents and visitors deserve a safe highway. Consider how effective the wildlife overpasses have been in Banff. Your efforts in creating a safer highway are appreciated.

Thank you for your consideration on this matter.

---

I live on Highway 20, at the bottom of Targhee pass in Montana. Just yesterday a mother bear was killed on the highway leaving two
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Island Park residents and visitors deserve a safe highway. So does the wildlife. Your efforts in creating one are appreciated.

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Island Park residents and visitors deserve a safe highway. Your efforts in creating one are appreciated.

Thank you for your consideration on this matter.

The Targhee pass is a killing zone for wildlife, our state’s treasure. Thank you for keeping wildlife and drivers safe as you advance this roads project and selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. Studying alternatives that include wildlife crossings is unprecedented in the state, and is a courageous step in doing the right thing for the safety of drivers and wildlife.

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This summer I had the pleasure of visiting Island Park and other areas of Idaho. While I saw amazing vistas and landscapes, I also saw roadkill and near misses as I drove to and from Yellowstone National Park on U.S. 20. I wanted to take advantage of this opportunity to thank you for considering safe passage for wildlife -- and drivers -- in this amazing area of a beautiful state.

I applaud your decision in selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment.

Studying alternatives that include wildlife crossings is an unprecedented move in the state, and a courageous step in doing the right thing for the safety of drivers and wildlife.

I support ITD implementing the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and the iconic wildlife, which add to your local economic prosperity.

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I am sure you know that U.S. 20 Highway, in the Island Park area, runs through some of the most beautiful and wildlife rich countryside to be found anywhere. I am writing to commend you for selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. Studying alternatives that include wildlife crossings is unprecedented in the state, and is a courageous step to do the right thing for the safety of drivers and wildlife.

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The world has been up and down in terms of protecting animals. Some great things have been done recently for them, but plenty of threats still remain. So many of our waters, public lands, forests, and open spaces have already been ruined by development, drilling, OTV/ATV use, encroachment, and other man-made harm. The animals are running out of places to live and be safe. Our wildlife are under threat from so many angles. They desperately need to be protected, mainly from humans. Life is hard enough for people, let alone the animals. Can’t we please offer them some much needed help?!

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Guaranteeing the safety of animals and of people is a noble and worthwhile cause, and wildlife overpasses are an excellent solution. As an Idaho resident, I strongly support this proposal. Thank you for your attention on selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. I commend you for studying alternatives that include wildlife crossings — an unprecedented move in the state, and a courageous step in doing the right thing for the safety of drivers and wildlife.

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Island Park residents and visitors deserve a safe highway. Your efforts in creating one are appreciated.

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Thank you for your consideration on this matter.

We need more wildlife crossings in Idaho and US20 is the perfect place to start!!!

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Thank you for your attention on selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. I commend you for studying alternatives that include wildlife crossings — an unprecedented move in the state, and a courageous step in doing the right thing for the safety of drivers and wildlife.

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Thank you for your consideration on this matter.

I’m supportive of your decision on selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. Studying alternatives that include wildlife crossings is unprecedented in the state, and is a courageous step to do the right thing for the safety of drivers and wildlife.

I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting both people who use the road, and our iconic wildlife, which add to our local economic prosperity.

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And equally important, the wildlife in the area deserve safe passage across the heavily traveled Highway 20.

Thank you for your consideration on this matter.

199 I have reviewed the 4 options proposed. Only the wildlife crossing with 3 bridges and fences will actually reduce the slaughtering of animals on 20. There are more and more large trucks and cars on 20. A fully loaded 18 wheeler weighs 108,000 pounds. A truck driver may wish to slow down if an animal is on the roadway- but a flashing sign is not going to get the driver stopped in time. The large vehicle is designed to go- and stopping is difficult. And a simple tractor- trailer is not all that is on 20 now- trucks with pups and trucks with 2 fully loaded trailers are regular vehicles on 20. I see them every day. Even more frightening is the idea of being in front of an 18 wheeler when a car in front responds to an animal on the road. Being crushed between a car in front and an 18 wheeler is not a happy ending.

Thank you for your attention on selecting safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment. I
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Thank you for your careful consideration of safe, solution-oriented alternatives in the Targhee Pass Environmental Assessment, particularly for studying wildlife crossings. Such crossings are as good for people as they are for wildlife, both in terms of safety of resources.

I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife, which add to our local economic prosperity.

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I suggest ITD implement the recommendations published in Dr. Cramer’s report: Safety Solutions for Wildlife Vehicle Collisions on US 20 and SH 87. This report calls for three wildlife crossings between mile markers 402 and 406 on Targhee Pass. Wildlife crossings with associated fencing are a successful and cost-effective way to decrease collisions with large animals, protecting drivers and our iconic wildlife, which add to our local economic prosperity.

In addition, I would like to request ITD study the following:

- Design and contour the highway to encourage speeds no faster than 45 miles per hour from the intersection with SH 87 to the Montana state line. This is in line with what members of the community of Island Park have requested;
- Shorten the proposed passing lane to two miles;
- Design a dedicated turning lane to the Targhee Creek Trailhead.

Island Park residents and visitors deserve a safe highway. Your efforts in creating one are appreciated.

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212

I hope there is still time to include the below email in the public comments on the Targhee Pass alternatives I am very concerned, as are many others, about the underreporting of roadkill on US 20. I don't think we have reliable data at all. Today I received photos of a bull moose hit and killed near Pinehaven. Yet some still claim few animals are ever hit.

I have been searching for better data on roadkill in Idaho, and I think the data on the IDFG/ITD roadkill site that Gregg referred me to a few weeks ago is not complete. Or else I am not entering my queries correctly. This is particularly concerns me in view of ITD's discussions about the Targhee Pass alternatives, when certain people including writers for the IPNews allege there is little or no roadkill up there. I know otherwise from personal experience, reports from friends and photos of roadkill on Targhee Pass from this summer.

I suspect much more data about roadkill exists, gathered by various different agencies, but is not being conveyed to the ITD Road Kill site. Perhaps the biggest issue is simply coordinating among the various agencies to gather the data in one place?

I believe it was mentioned in the Island Park Safe Passage Working Group conference call last month that the RoadWatchBC data might not be getting to ITD. But this may not the only glitch in the system.

Below are two screen shots that make me think that you are not gathering all the data in one place.

When I input these criteria - roadkill, US-20, Fremont County, any species, from Jan. 1 to today, I get the report in the second screenshot. Not many reports. Only four reports since July 1st of which two are skunk/stink/badger. No roadkill reported on Targhee Pass for the entire year. Yet Randy Gravatt, who drives US 20 over Targhee Pass daily, says he sees 25-30 dead animals on that 4-mile section in a year, mostly elk and deer. He reports these on the RoadWatchBC mobile app, having been told the data would be conveyed to ITD.

What about the bison hit and killed this summer on US 20 north of the Hwy 87 intersection, which also is not reflected on your roadkill site? The sheriffs dept and EMT were both called in the case of the bison. Does either one report road kill? Do they keep this information in a separate database or is it conveyed to IDFG/ITD? I guess I could enter the bison death myself on your website based on the many news reports, so it is at least in the data base?

The above search criteria produce this report:

In contrast to the above, is the below screenshot from RoadWatchBC. I think these reports start in about April. I had been told this data was being conveyed to ITD but even allowing for the fact RoadWatchBC includes live animal sightings, I certainly don't see it reflected in the ITD data. Note there are a number of reports for Targhee Pass:

I hope you can do something to improve the availability of data on roadkill in Idaho. I have seen numerous news reports from other states that mention numbers from those states but have not found anything recent for Idaho. I would like to refer to some Idaho statistics in writing a letter to the editor or opinion article, but cannot find the information, and what I find in a search of your roadkill site I know to be incomplete.

Many thanks for your consideration of these concerns.
Appendix F

Public Meeting Presentation, August 30, 2017

Verbal Comments Recorded on Flipchart
The following comments were captured during the Alternatives Presentation at the August 30 public meeting.

1. Provide more information about project cost/federal funding
2. Aesthetics considerations (visual impact of design elements)
3. Left turn into Howard Springs
4. Human/animal use of structures
5. Height of trucks v. potential wildlife overpasses
6. SLC-MT: wildlife overpasses in other states, determine effectiveness and lessons learned
7. Noise – populated areas
8. Pullout to chain up/off on Idaho side of pass
9. Signage for pull off parking at junctions (line-of-sight)
10. Brake failure pull off lane (is there a need for a runaway truck ramp?)
11. Centerline rumble strip
12. Number of vehicles turning left at Howard Springs
13. Snow removal, tree removal for shading and wildlife
14. Wildlife fence in front or behind Big Horn Hills Estates (determine location, obtain resident input)
15. Could wildlife crossing also be used by snowmobiles?
16. Hiking trail access at top of pass
17. Look at Gallitan WVC study results
18. LiDAR effectiveness for WVC reduction
19. Access effectiveness with snow
20. Add a 5th Alternative: in-vehicle collision avoidance technology for WVC reduction – ITD to make road improvements only
21. Consider cost of alternatives including ongoing maintenance costs, and who would pay for maintenance of facilities/structures built for wildlife?
22. Speed reduction to reduce wildlife-vehicle collisions and improve safety during winter conditions