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Adam Rush, Public Involvement Coordinator  
Office of Communications  
Idaho Transportation Department  
3311 West State Street  
Boise, Idaho 83703  
adam.rush@itd.idaho.gov

Brent Inghram, Environmental Program Manager  
Kyle Holman, Operations Engineer  
Federal Highway Administration Idaho Division  
3050 Lakeharbor Lane, Suite 126  
Boise, Idaho 83703  
brent.inghram@dot.gov  
kyle.holman@dot.gov

Sent via email and attachment

**WIRT Comments on U.S. Highway 95 Thorncreek Road to Moscow Project**  
**Final Environmental Impact Statement**

Mr. Rush, Mr. Inghram, Mr. Holman, and ITD and FHWA staff,

On behalf of over 3200 members, friends, and allies of Wild Idaho Rising Tide (WIRT), including potentially impacted, concerned Idaho citizens and residents near the proposed and existing alignments of U.S. Highway 95 south of Moscow, Idaho, I respectfully offer and request inclusion in the public record of these comments regarding the U.S. Highway 95 Thorncreek Road to Moscow Project Final Environmental Impact Statement (FEIS, http://us95thorncreek.com/). On Friday, August 14, the Federal Highway Administration (FHWA) and Idaho Transportation Department (ITD), in cooperation with the U.S. Army Corps of Engineers, published a notice of availability of this FEIS in the Federal Register, starting a 30-day public agency and citizen review period. WIRT and associates collectively object to the choice by ITD and FHWA of their preferred alternative, the easternmost E-2 route along the flanks of Paradise Ridge, from among the no action and three action alternatives (modified W-4, C-3, and E-2) of the FEIS for this Highway 95 realignment and expansion project. In support of this official letter of opposition to ITD/FHWA selection of E-2 and resulting, destructive,
implementation activities on Paradise Ridge, we incorporate the concerns, oral testimony, and comments of the Paradise Ridge Defense Coalition (PRDC) and its attorney and members, to which WIRT contributes as a member organization and board member.

Contrary to the mandates of the National Environmental Policy Act (NEPA), the FEIS insufficiently provides the basis for rational public and agency evaluation and decisions about this project’s predictable adverse impacts, questionable benefits, and un- or under-explored alternatives of Highway 95 modification on Paradise Ridge. It contains numerous deficiencies, including inaccuracies, misstatements, and errors, as well as omission of substantive responses to citizen comments. In addition to the absence or misrepresentation of data and its analyses in technical reports accompanying the FEIS, the huge document presents several new or extensively revised reports, like those assessing highway safety, weather, and affected groundwater.

WIRT thus strongly encourages several corrective courses of action for ITD and FHWA, before their issuance of the Record of Decision (ROD) on this project. We insist that these agencies prepare a Supplemental Environmental Impact Statement examining citizen-suggested alternatives not considered in the FEIS. WIRT accordingly urges an extension of the comment period on this project, to accommodate greater opportunities for public involvement necessitated by a combination of intense public interest, the size and intricacies of the FEIS and consequent time required for informed public review and discussion, and ITD’s characteristic withholding of public records from fellow PRDC board members, like similar instances of denial to WIRT.

But, in light of myriad delays during a decade-plus of concerned citizen contentions over ITD’s ongoing promotion of the least environmentally and socially suitable reconfiguration of the six miles of Highway 95 south of Moscow – which have caused numerous traffic accidents and deaths – WIRT activists and members also urgently request that ITD and FHWA, prior to project ROD issuance, reconsider their selection of the E-2 realignment and instead approve and adopt the most readily available and reasonable FEIS alternative, C-3. WIRT thoroughly concurs with the PRDC comments submitted by attorney Natalie Havlina on September 14, 2015, although we also suggest that ITD and FHWA completely overlooked in their project FEIS a few further considerations, addressed nowhere in the FEIS: The separate and compounded damages imposed by climate change, highway relocation, and the transportation of overlegal and oversize loads on plant and animal populations around the proposed E-2 route.

Thank you for your consideration of these comments,

/s/ Helen Yost, MSEE
Wild Idaho Rising Tide
P.O. Box 9817, Moscow, Idaho 83843
wild.idaho.rising.tide@gmail.com
WildIdahoRisingTide.org
Facebook.com/WildIdaho.RisingTide
208-301-8039