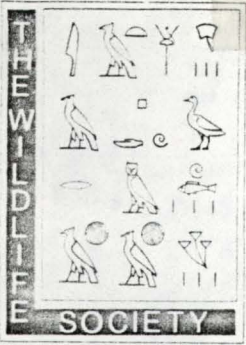


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IDAHO CHAPTER
THE WILDLIFE SOCIETY

NATIONAL HEADQUARTERS
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March 10, 1981

10658 Winterhawk
Boise, Idaho 83709

Mr. James H. Clayton, P. E.
District Engineer
Idaho Department of Transportation
P. O. Box 837
Lewiston, Idaho 83501

Re: Project No. FR-4201(39) U. S. Highway 12, Kooskia-Montana State Line

Dear Mr. Clayton,

The Idaho Chapter of the Wildlife Society has reviewed your recent brochure on the U. S. Highway 12 proposed improvements east of Kooskia, Idaho. We, as a cadre of professional wildlife biologists working in the State of Idaho, feel deeply responsible for the welfare of wildlife and its sustaining habitat. In that regard, we find your brochure informational, but also onesided and misleading as to what the future prospects are, in terms of recreation, animal-vehicle conflicts, and land and water management responsibilities of the U. S. Forest Service.

Since the objectives set forth in your brochure will not be compatible to all users of the highway (especially bicyclists) and will negatively impact the environment, the current problems would get worse. If the conflict was purely between the commercial and private traffic, you have only offered a cosmetic solution. We would envision faster truck movement, increased road kills of wildlife, and a higher probability of increasing numbers of commercial users of this highway. If Idaho Department of Transportation's (IDT) intent is to make Highway 12 a "national interstate freight route", we feel the impacts to the whole highway facility in Idaho should be addressed. It would also seem logical to remove the National Wild and Scenic River status considering your maintenance difficulties, although we doubt this is your intention. However, in proposing this additional construction, you seem to be ignoring this important and unique designation.

Specific comments:

Page 3 - What does "recreational river classification" mean to ITD? Would you elaborate on shoreline developments, both existing and what you propose? How does river management planning fit into your management planning? Under the heading "Vegetation", are there aesthetic aspects worth mentioning? Your "Wildlife" section appears to be superficial and inadequate.

Page 5 - What is the present and future road and bridge adequacy requirements for U. S. Highway 12?

Page 8 - You mention that upgrading is necessary for safety reasons and that "many sections of the highway do not conform to present day design standards". Are these standards being revised to meet commercial vehicle use, i.e. weight, length, visibility, etc? If the road was at "standard", are there relevant comparative data available to assure the public's safety?

Page 9 - Would you elaborate on the "extensive maintenance work" as to costs (expected as well as current)? How much of these costs are being assumed by the commercial users versus the public-at-large? What part of future funding comes from federal coffers?

Page 10, 11 - Could you give us future predictive information in lieu of past results, with and without highway upgrading?

Page 12 - Does the USFS agree with relocating of existing campgrounds? Where do you propose this be done and who would pay for it? Why is relocating the campground the only viable alternative to the noise pollution problem? What about discouraging the heavy truck traffic by lowering the speed limit?

Page 14 - Agreeing that winter driving in mountain country is hazardous, how does IDT propose to improve road maintenance, with the problems of fuel costs, lack of materials or sufficient funding?

Page 15 - Riprap placement as well as guardrail placement will impact wildlife mobility and general aesthetics. How much, where, and when cannot be accurately predicted, yet we foresee a collision course on each attempt for safety or integrity with the environment. Isn't there a better way to plan these features as well as those for widening or realignment?

Page 16 - The increasing number of accidents or complaints of near misses indicate a need for more passing lanes. If more are added, does that significantly decrease the problems or just increase highway use with the same levels of problems or worse? Is this just the first step in eventually turning Highway 12 into a four-lane road?

Page 18 - Is commercial traffic mainly responsible for roadbed or bridge deterioration? Also, we endorse the concept of carrying out repairs under "planned methods" rather than under "emergency circumstances".

Page 19 - Under Section B a list of safety improvements have been made. What were the costs (in dollars as well as natural resources)?

Page 27 - If the bikers (a road user) are to have a safe facility, you propose a 32 foot roadbed. Is that not also a commercial traffic standard for all 2-lane highways? It seems you are trying to justify the wider roadbed for biker safety, when in fact you could make it more safe by discouraging the commercial traffic, or at least slowing it down.

Page 28 - Reflectors deterring animal-vehicle conflicts are not showing good results. From some recent studies in Europe using a modified scare deflector, evidence does appear good. But, to suggest that these would decrease animal-vehicle collisions on highway 12 is far from realistic. We encourage further investigations, noting the past records which only represent confirmed animal kills.

Page 30 - Efforts to reduce speed could be applied. Have you considered this? Can you enforce speed limits when it has been repeatedly demonstrated that weight and length limits have not been enforced? Under the section reacting to "benefitted entities", we cannot agree that recreationists or forest management gets positive results. A more efficient facility appears very conducive to increasing commercial traffic volumes, which definitely does not benefit recreation or wildlife.

Page 31, Section D - No. 3 - If you agree that state laws exist to protect migratory fish, why hasn't this already been done? Are members of the Fish and Game Department the only ones interested? How about the USFS, Fish and Wildlife Service, Northwest Steelheaders? No. 4 - Improved sight distance is fine for human safety, day and night. As for nocturnal animals, i.e. deer and elk, the assumption is invalid. If the animal looks at the oncoming vehicle, the vehicle driver may react. Since elk and deer eyes intensively reflect light, but their images are poorly discerned (day or night) we can't find sight distance an environmental benefit. This entire section appears to be a desperate attempt on your part to justify your proposal. Almost all the same benefits could be applied to an alternative of reducing truck traffic.

Page 32 - Under long term adverse effects of the proposed improvements, we offer these for consideration among those you have already mentioned.

- 1) Increased commercial traffic and resultant air and noise pollution. These impacts are inconsistent when protecting a wild and scenic river corridor.
- 2) Increased animal/vehicle conflicts
- 3) Reduction of recreational use and values
- 4) Wildlife habitat losses
- 5) Increase use of fossil fuel resources by commercial traffic
- 6) Forest Service mismanagement of a designated wildlife and scenic river resource
- 7) Obstacles to meeting criteria of the Forest Planning Act and the Department of Agriculture's Fish and Wildlife Policy of July 8, 1980.

We are most concerned about your efforts to treat this highway like any other state highway in proposing solutions to its problems. Instead, you should realize what a unique situation it is, being within a Wild and Scenic River corridor, and treat it as such. We are surprised and disappointed that you have not proposed steps to reduce or discourage heavy truck traffic along this route.

We trust our comments help demonstrate why a conflict exists on Highway 12 and why a NEPA scoping for all planning on the highway needs to be done. Thank you for this opportunity to express our concerns.

James F. Gore
President, Idaho Chapter
The Wildlife Society

JFG:ff