



October 22, 2021

Micah Brown, Project Engineer  
Idaho Transportation Department  
District 6  
206 N. Yellowstone Highway  
Rigby, Idaho 83442

RE: PEL study of the US-20 corridor between Ashton and the ID-87 Junction.

Mr. Brown,

The Mission of the Henry's Fork Wildlife Alliance (HFWA) is to protect and conserve the native wildlife and its enjoyment by the public in the Upper Henry's Fork watershed. We are the only organization whose members are devoted solely to protecting wildlife populations in the Upper Henry's Fork. Through our members' support, HFWA helps insure the iconic wildlife of the Upper Henry's Fork Watershed thrives in connected and sustainable habitats because its residents treasure diverse and healthy wildlife populations and understand what is required for their continued success.

HFWA is highly interested in the PEL study of the US-20 corridor from Ashton to the ID-87 junction that the Idaho Department of Transportation (ITD) has undertaken. Our members travel US-20 regularly to and from their homes and for business and recreation. We appreciate and welcome the professional work and focus that ITD is giving this section of highway. It is important to the people of Island Park, Fremont County, Idahoans across the state, and the visitors to the Greater Yellowstone Ecosystem. It is with this in mind that we submit the following comments to help inform the PEL study and ITD on US 20.

### **Purpose and Need**

Fremont County, Idaho is characterized by the high quality of life its human inhabitants enjoy. Much of this is due its abundant, diverse, and healthy wildlife; its rich and accessible public lands; and the abundant snow that falls in the winter and then turns into the clear, fresh, clean water supplying Henry's Lake, the Henry's Fork, all the tributaries, fisheries and farms that depend on this snow and water. As goes the Henry's Fork Watershed, so goes Island Park, its residents, and its visitors. In this light, we request the ITD PEL study ensure that these most important qualities are quantified and evaluated and any and all alternatives are selected so as to conserve these values. This means that the PEL and any subsequent US 20 management and projects should include in its purpose and need that ITD will protect, enhance, and restore these resources and values as relates to any and all ITD actions taken on US 20.

### **Big Game and Hunting**

We request ITD assess and include the importance of big game, big game harvest, hunting, and wildlife viewing in Fremont county as part of the PEL. An initial assessment tells us big game is important and abundant. For example, a typical hunting season in Fremont county might produce 858 deer, 566 elk, 55 moose, 22 antelope, 103 black bears, 12 lions, and 6

wolves. These numbers reflect both the diversity of big game species available in Fremont County as well as the importance of the county to both resident and non-resident hunters. It has been estimated that approximately 8500 hunters participate in big game hunting in Fremont County every fall. These thousands of hunters are spending time in Fremont county, they are spending money in Fremont county, they come from all over Idaho and outside the state, and they benefit from the continued production and sustainability of all big game species in Fremont County. Many of these hunters are Fremont County residents, local business and property owners, and employees of the Idaho Department of Transportation. Protection of their hunting opportunities, of an abundant and harvestable surplus of big game, and of public access and lands in Fremont County need be incorporated into the ITD PEL study and all subsequent alternatives, management, and actions on US 20.

Unfortunately, increasing traffic and development of US 20 threatens the continued health and abundance of big game in Fremont County. This is the result of several factors. First, US 20 is a north-south road that bisects seasonal migration and movement pathways and routes of big game going to and from the high elevation summer ranges of eastern Fremont County and Yellowstone Park to the lower elevation Sand Creek area winter ranges west of US 20. Protecting these migrations and movements is essential to the continued health of big game in Fremont County, Yellowstone National Park and big game units 61, 60, 62A, 60A and 62. This has been recognized for a long time. Even including an agreement between the County and Department of Fish and Game concerning limiting human activity on Sand Creek winter ranges. The current footprint of US 20 bisects these important migration and movement areas. This is documented in numerous IDFG and ITD reports that we ask to be referenced and summarized as part of the PEL process and that they be used in development of alternatives and the purpose and need.

The fact that US 20 hinders wildlife movement in its current condition and use must be taken into account, as should any proposed expansion or modification of the US footprint. We suggest that any and all actions and alternatives proposed to expand the footprint of US 20 do so only so much as the proposed actions balance impacts through restorative and enhancing actions related to wildlife movement and migration across US 20. Similarly, the speed and amount of traffic hinders wildlife movement and migration across US 20 and is also a direct source of mortality. The latter has been extensively documented in numerous studies by both ITD and IDFG and partners as well as being continuously updated and a running record kept via IDFG's Roadkill and Salvage database. This database is a continuing source of data on the wildlife killed by US 20 traffic, the real and potential threat to drivers from such collisions, and the type of wildlife threatened by wildlife-vehicle collisions on US 20. These include all the big game species named above as well as bison and grizzly bears. We request that ITD make extensive and objective use of this database. Any and all associated studies related to roadkill and WVC's on US 20 as well as how best to reduce or eliminate roadkill related to roads and highways should help inform PEL wildlife impacts and restoration and enhancement opportunities, driver safety improvement efforts, and all potential concerns related to elimination of wildlife migration and movement as related to proposed improvements of US 20.

### **Wetlands**

The portion of US 20 under study by the PEL bisects numerous wetland and stream complexes. These are important for the continuing function and health of the hydrology of the Henry's Fork, the important riparian and wetland and aquatic resources they support, and the economic and recreational benefits provided to Island Park and its visitors. Their continuing function and health will also help alleviate the increasing impacts of climate change. We

request that the PEL study consider these ecosystems and associated wildlife species such as trumpeter swans, beaver, otter, waterfowl, fish, numerous wetland and riparian dependent migratory bird species, as well as fish when evaluating potential management and project actions on US 20. Similarly, it will be important that the PEL study evaluate US 20 management and project alternatives in relation to the recreational use of the river, lake and their tributaries. Important considerations should include impacts to hydrology, connectivity, river and stream access and water quality and quantity. The effects of US 20 projects and management on river user experience should also be part of the PEL evaluation.

### **Wolverines**

The IDFG Wolverine Management plan identifies the landscape through which the northern portion of US 20 travels as an important linkage area. Linkage of wolverine populations, a widely dispersed and highly mobile species, is important to maintaining the health, viability, and productivity of wolverine populations across the Rocky Mountains, Idaho, and the Greater Yellowstone Ecosystem. Increasing threats to wolverine linkage, connectivity, and mobility could jeopardize its continued management by the state of Idaho and cause it to be listed under the Endangered Species Act. Any and all proposed actions and assessments of US 20 should fully consider wolverine biology and ecology and take appropriate steps to insure US 20 management and projects only improve wolverine linkage and connectivity, population health, mortality, and abundance.

### **Traffic Speed**

High traffic speeds increase the threat of WVC's. Driver response time is less and the probability of wildlife surviving any vehicle collision decreases as traffic speeds increase. We request traffic speeds on US 20 be evaluated in the context of threat to wildlife and wildlife migration and movement. There are many technical studies and references to this that the PEL should include in its assessment. There are also studies of US 20 that have evaluated traffic speeds in relation to other options providing for wildlife migration and movement and decreasing WVCs on US 20. We recommend these studies and their information and recommendations be included as part of the PEL study and subsequent management and projects on US 20. Further we recommend that reduction of WVCs while maintaining wildlife connectivity and movement be made part of the purpose and need of the PEL and any subsequent projects to address both driver safety and wildlife movement and migration.

### **Public Lands**

A majority of ownership adjacent to US 20 is US Forest Service. These public lands are essential to providing for continued health and abundance of wildlife, big game and big game hunting seasons, and public access and outdoor recreation. Because US 20 bisects USFS ownership, ITD projects and work related to US 20 should avoid introducing potential for decline of these resources and opportunities on USFS lands. All efforts should be made to ensure that US 20 is compatible with maintaining and enhancing these resources on USFS lands as well as being compatible with USFS efforts to achieve their wildlife and recreation objectives. Similarly, this should include concerns related to wildfires and wildfire management. Especially as related to fire starts and sources of fire starts related to US 20 and given the increasing effects of climate change.

### **Outdoor Recreation**

**Outdoor recreation is an important business and value in Fremont County.** This applies to both the residents and property owners of Fremont County as well as visitors coming from elsewhere. To that extent, we strongly recommend that the PEL process identify and assess

how public and recreation access will be managed, protected, and provided for in relation to US 20 management and projects.

### **ITD-IDFG Collaboration**

We strongly recommend a collaborative and cooperative effort between IDFG and ITD during the PEL process. IDFG has and is producing important science and management related to roads, road ecology, and wildlife movement and migration. We strongly urge their active participation and help in developing, gathering, and providing the best and most objective information on these topics for the PEL study on US 20. Similarly, we urge ITD to reach out to other state DOT's concerning these issues. Many other state Transportation Departments are engaged and working on these issues with great effectiveness. They could provide the PEL and ITD ideas and strategies for how best to conserve their states wildlife and recreation resources while providing for its transportation needs.

### **Climate Change**

As any and all proposed improvements to US 20 will have a relatively long infrastructure life, we recommend that the PEL study be done in the context of continuing and accelerating climate change. Factors important to consider should include increasingly higher temperatures and changes in precipitation that will affect hydrology, habitats, fire frequency, and the need for wildlife to move and migrate under climate change. In particular, we recommend assessing the influence of more impermeable surfaces on the Henry's Fork watershed and necessary changes in bridges and stream crossings as climate changes hydrology in streams and rivers as well as how best to provide uninhibited wildlife movement and migration no matter the season or traffic/use of US 20. Further we recommend you evaluate US 20 improvements in relation to growing us of electric cars and self-driving vehicles, among others.

### **Use and Capacity of US 20**

As traffic has increased on US 20, an increasing share of use has come from increased trucking/freight traffic and traffic traveling to Yellowstone National Park. (YNP) We recommend the PEL evaluate these changes and traffics in the context of what is best and appropriate for Island Park, Yellowstone Park and the Greater Yellowstone Ecosystem. In particular, we are concerned that roads and highways to YNP are being improved so as to carry more and faster traffic to YNP when it already has an overload of visitors and is close to or already exceeding park capacity. State transportation agencies should not be spending funds to improve traffic to such places as YNP if the result will only be a degradation of the resources of YNP, an ultimate limit on the number of visitors allowed in YNP, and further decline in the greater Yellowstone Ecosystem. We recommend coordination and collaboration among partners in the GYE to address this concern and that it be made part of the PEL study and process and any further actions concerning US 20. Similarly, increases in freight/truck traffic on US 20 are outside the normal and expected uses of US 20. Such increases are not conducive to the quality of life that property owners and residents of Island park or in the Henrys Fork watershed hope to maintain and conserve. The PEL should evaluate this trend and what actions might be possible to reverse and/or redirect such traffic to more appropriate and expected routes.

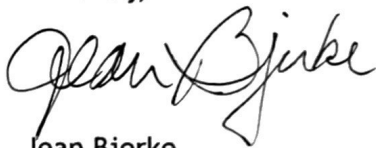
### **Communications**

Finally, we think it important to ITD's efforts on US 20 that the process and communications about the process focus on and provide accurate and objective data, information, and conclusions. It is paramount to the public that ITD serves that the PEL, management, and

project processes generate trust and credibility in the public. This will require that ITD and its contractors be even and balanced in how information is presented, that data, management practices, and science be assessed and presented objectively, and that misinformation used by or being circulated by or in public forums be corrected. We appreciate the complexity of the issues and the different interests who are interested and concerned with what happens to US 20. None of them or ITD will be well served if objectivity, credibility, and trust are sacrificed to appease a schedule, a preordained outcome or different interests and stakeholders. The integrity and professionalism of ITD rely on this.

Thank you for your time and consideration of these comments. The PEL and subsequent actions by ITD on US 20 from Ashton to ID-87 intersection can serve to enhance the community of Island Park, its quality of life, and the landscapes and ecosystems the people of Island Park, Idaho, and elsewhere depend on. We look forward to remaining actively involved as the US 20 PEL and related work moves ahead.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Bjerke". The signature is fluid and cursive, with the first name "Jean" being more prominent than the last name "Bjerke".

Jean Bjerke  
President  
on behalf of the Board of Directors  
Henrys Fork Wildlife Alliance

Cc: Idaho Department of Fish and Game Region 6, Idaho Office of Species Conservation, USFS District Ranger Ashton/Island Park, Island Park City Council, Administrator Federal Highways Administration Boise, Idaho, Rep. Van T. Burtenshaw, Rep Karey Hanks, Rep. Rod Furniss, ITD Board Member Rob Hoff, Director ITD, Director IDFG, IDFG Commissioner Attebury