



**HENRYS FORK
WILDLIFE ALLIANCE**
CHAMPIONS FOR WILDLIFE

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July 30, 2025

Via email: itipcomments@itd.idaho.gov

Idaho Transportation Department
Attn: Noah Ipaye
P.O. Box 7129
Boise, ID 83707

Re: Comments on Idaho Transportation Department 2025-2032 Idaho Transportation Investment Program

Dear Idaho Transportation Department,

The Henry's Fork Wildlife Alliance (HFWA) thanks you for the opportunity to comment on the draft Idaho Transportation Investment Plan for fiscal years 2026 through 2032. We are a local grassroots citizens' organization devoted to engaging local communities in the conservation of healthy wildlife populations in the Henrys Fork Watershed, specifically the area surrounding Island Park, Idaho. A top priority for HFWA is to ensure we keep our habitats high quality and connected for our local and migrating wildlife.

Well-maintained roads and highways can be crucial lifelines for rural residents to access recreation, services, and work, and these arteries connect the vast, varied regions of our state. They also pose a fatal risk to Idaho's wildlife populations, particularly large ungulates that undertake seasonal migrations twice a year, including pronghorn, elk, deer, and moose. Between 2009 and 2020, 12,635 wildlife-vehicle collisions were reported in the state, an average of more than 1,000 annually, though that number is likely much higher, as data collection and reporting does not capture all of these crashes¹. Idaho Fish and Game (IDFG) roadkill data for US20 and SH87 in Fremont County indicates that 60 deer, elk, moose or bears were documented during 2024. Again, the true number of animals killed is likely significantly higher as there was not a concerted effort to record every roadkill incident. A recent report from the Center for Large Landscape Protection (CLLC) estimates that the total economic cost of a wildlife-vehicle collision, factoring in vehicle damage and the animal's monetary value, to be \$19,000 for deer; \$73,000 for elk; and \$110,000 for moose (in 2020 US\$)². Each of these crashes causes hardship for Idaho families and emergency personnel in addition to negative impacts on animals that the state has been charged with managing.

Transportation planning on US20 through Island Park has been going on for many years, and we wish to comment on both the individual projects in our region and long-term planning processes. As Island Park's local wildlife advocacy organization, we encourage the Idaho Transportation Department (ITD) to incorporate wildlife permeability into road construction projects at the planning stages. Crossings, either over- or underpasses with requisite fencing, are the most effective solution, leading up to a 90% reduction in wildlife-vehicle collisions.

¹ Paul, K., J. Faselt, M. Bell, M.P. Huijser, D. Theobald, A. Keeley, and R. Ament. 2023. West-wide study to identify important highway locations for wildlife crossings. Center for Large Landscape Conservation, Western Transportation Institute – Montana State University, Bozeman, MT. <https://doi.org/10.53847/QVYS3181>. P. 21

² Paul, et al. 2023. P. 22

Though crossings are the most effective approach, IDFG's State Wildlife Action Plan includes other recommendations that can increase permeability, including ensuring bridge retrofit projects allow wildlife movement and building culverts so that aquatic organisms may migrate underneath roads. To best serve Idaho's wildlife populations, we ask ITD to closely partner with IDFG to determine locations for crossings and other infrastructure that will connect Idaho's vast landscapes. At the state and district levels, we also hope ITD will convene stakeholder groups that include leaders from the public and NGOs. These groups would allow ITD to leverage community support and engagement during planning and implementation, as well as secure funding sources like grants. For appropriate projects in District 6, particularly those that impact roads in the Island Park area, HFWA would be happy to serve as part of such a coalition.

Two major projects are proposed in Island Park. Below, we provide some specific recommendations for how the road construction can best serve the area's residents and wildlife.

US20 Ashton to SH87: This project has been in the Planning and Environmental Linkages phase for many years, though ITD officials told the community they hope to enter the National Environmental Policy Act review process as soon as 2025³. Wildlife-specific crossings are not included in the PEL alternatives, though we thank ITD for recognizing the need for wildlife permeability in the draft Purpose and Need statement for this project⁴. Designs and NEPA scoping should include wildlife crossings at locations identified by IDFG at the earliest possible stage. Dr. Patricia Cramer's 2016 report, *Idaho Wildlife Connectivity and Safety Solutions on US 20 and SH 87*, the Interagency Grizzly Bear Study Teams report - *The Summary of U.S. Highway 20 Crossing Events by GPS-Collared Grizzly Bears in Idaho, 2000-2020*, and IDFG's report - *Roadside Survey of Carcasses on US Highway-20 and State Highway-87 in Southeastern Idaho* to identify crossing locations should all be used as a resource for ITD in evaluating which locations might be feasible for crossings.

US20 is the lifeline of Island Park, and much of the community is opposed to a four-lane highway between Ashton and SH87⁵. Much of Island Park's community character is derived from travel on this highway. A four-lane road will inevitably change that character, and we ask ITD to consider alternatives that do not retrofit the entire stretch to include four lanes. Beyond the impacts to community character, a four-lane design will lead to more habitat fragmentation. Animals would have larger stretches to cross, while any split four-lane sections, which are included in some alternatives, would require them to cross separate two-lane roads and would create habitat between the road sections, leading to more wildlife in proximity to the road. A four-lane design goes against much of the community feedback provided during the PEL process and without wildlife-vehicle collision mitigation would exacerbate existing problems on US20.

We ask that ITD district staff participate in a local stakeholder coalition to provide education and keep the public engaged as the NEPA process unfolds. This will foster trust between agency officials and community members throughout the many years this project will take. HFWA would like to lend our local expertise and experience to any coalition that is formed.

US20, SH87 to Montana State Line: Many of our recommendations are the same as for the US20, Ashton to SH87 project. We ask that ITD consider locations for wildlife permeability for both aquatic and terrestrial species, as appropriate, and that the agency coordinate with IDFG to determine wildlife needs in this area.

³ Island Park community meeting presentation, August 2024.

⁴ https://us20ashtonto87.com/_archive/PIM-2/

⁵ Personal communications with residents and comments made at Island Park community meeting, August 2024.

The ITIP mentions a possible truck climbing lane⁶. If the inclusion of this lane in the project were to widen the road, wildlife permeability would become even more important. Were ITD to include this lane in the design, we ask that appropriate measures be taken to ease wildlife passage to limit habitat fragmentation.

Thank you again for the opportunity to comment on this important planning document. HFWA's staff and Board look forward to collaborating with ITD on projects in District 6 to ensure that the needs of drivers and wildlife are met.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jean Bjerke".

Jean Bjerke, President, Board of Directors

Henry's Fork Wildlife Alliance

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⁶ Idaho Transportation Department Draft Transportation Investment Plan, FY 2026-2032, p. 156