



Public Hearing
Transcription
Feb. 13, 2008

Draft EIS

Comments are transcribed verbatim. A blank line () indicates that the comment was not legible.

What are your comments on the Draft Environmental Impact Statement?	
#	Comments
1.	
2.	
3.	
4.	
5.	
6.	
7.	Concerning the environment there - I don't care. The bridge over the road needs to be built. The birds, fish, and animals will change their habits during construction, then will move back to the area and find their right place in the environment. I've lived in this valley for 53 years and floated it for the first time last summer.
8.	<ul style="list-style-type: none"> • In this section, habitat impacts to the showcase species was addressed, i.e. Bald Eagle, Osprey, etc. You failed to address habitat impacts to the many non-game birds and mammals that inhabit the corridor. I believe there should be a list of all wildlife species impacted by this project included in the EIS. The list should include birds, mammals, amphibians, etc. This would indicate that you at least looked at their habitat needs. • Your mitigation section needs to be expanded to address impacts to these non-game species. • In your list of preparers, I see no person with a wildlife degree that could address habitat needs. • Did you force an engineer to do it??? • If you go to court over this EIS, who will develop your habitat mitigation proposal??
9.	I appreciate the consideration to the rookeries.
10.	
11.	Given the choice of alternative 6, east vs. west alignment, my preference would be to lean toward benefiting the existing wildlife rather than existing humans (residential and business) concerns. It appears that the east alignment would be that choice. In addition, the estimated \$20 million savings is significant and worth my vote.
12.	
13.	Looks good and thorough.
14.	Needs to happen ASAP for traffic adjustment on Glenwood St. & Eagle Road.

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15.	This is great, but needs to be done sooner than 2015.
16.	
17.	
18.	The Draft EIS appears to have adequately addressed the major issues.
19.	
20.	I appreciate all of the work and studies that you have done, and the willingness to listen.
21.	
22.	I like the proposal and wish that it would be sooner rather than later to be built.
23.	Please also consider latest plans for Avimore, etc. in traffic load projections
24.	Well done!
25.	Good presentation of information. Questions/suggestions: <ul style="list-style-type: none"> • Has data (i.e. traffic counts) been updated since 1995? • Put N-S-E-W compass on all maps and images • Get newer images (3 & 6 of display) that show Maple Grove done and the real existing structures on State Street.
26.	I prefer the East River Crossing option.
27.	
28.	
29.	
30.	I'm just glad there is such a protection in place.
31.	Look like the impact of the various options is similar. I think the benefits of the crossing to the community will outweigh any impact that can not be reasonably mitigated.
32.	If the bridge is done, construction should be for a two year project so that the job can be done by Idaho companies instead of out of state companies. We need to keep jobs in Idaho and money in Idaho. If the sales tax is raised to 7% it would help finance this project – but the tax would be for only two years (see other comments – to continue).
33.	Sounds very complete – good job.
34.	Traffic and pedestrian volumes at McMillan/Cloverdale are currently unsafe, and getting in and out of Centennial H.S. is a huge headache – that's with the current 5 lanes. Children's safety is a primary concern and that area will be a safety nightmare with the proposed traffic increases. A pedestrian overpass is needed to allow safe access across Cloverdale and a signal will be needed at W. Hickory to allow reasonable traffic movements.
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43.	

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Alternative 6

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Do you agree or disagree with Alternative 6 as the recommended preferred alternative?

#	Agree	Disagree	Comments
1.			
2.			
3.			
4.			
5.			
6.		X	A goal would seem to be to basically move traffic efficiently! We are not moving traffic across the valley efficiently (North-South) as the new river crossing is intended. The ___ south end of the crossing? Chinden Blvd. to Mountain View Drive is very inefficient. This alignment will push more traffic over to Eagle Road so people can move efficiently to/from the south. It is strongly believed that it would be more efficient to have a main connection to Five Mile Road. Traffic could more efficiently move to/from the interstate connection at Milwaukee Street near the mall.
7.	X		I did not agree originally but because you've messed up things before now, this is the best band-aid. I think a freeway connection at Five Mile and a straight road to Hwy 55 would be best. It would have saved fuel!
8.			
9.	X		It makes the most sense.
10.	X		I'm anxious to see this project built.
11.			No comment.
12.		X	<ul style="list-style-type: none"> • Connection to Five Mile Road in addition to Cloverdale Road and Mt. View Drive should also be provided. • Should consider moving crossing farther west to avoid construction in pond, which will be very expensive, but of the two shown, the east crossing would be better.

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13.	X		<ul style="list-style-type: none"> • Least impacts to north-south streets initially. • Most problems fixed by signal adjustments to make it all work. • Later expect Cloverdale widened.
14.	X		It helps reduce traffic on Chinden St. & State St. from the bench area.
15.	X		The least uprooting of people and homes.
16.	X		Traffic must be moved to relieve traffic on Glenwood St & Eagle Rd.
17.		X	I hate to see the 100-year-old Harris Farm destroyed.
18.	X		However, this corridor opens up considerable property, north of Chinden and both east and west of the alternative for development. Access to this property needs to be considered, including an access roadway between 3CRX and Eagle Road. The lack of pre-planning access on a larger scale can result in land-locked parcels (which won't happen) or undesirable access down the road when the property does develop. Access to serve these properties need to be considered now before they develop or develop on a piecemeal basis.
19.	X		It will relieve traffic flow on Eagle Rd. & Glenwood St. and separate east-west traffic on Chinden Blvd. to two intersections.
20.			Uncertain. Recognizing that one goal is to lessen traffic on Eagle & Glenwood bridges, but once traffic hits Chinden, where does it go? Will this create one more problem on Chinden?
21.	X (strongly!)		This appears to spread traffic most evenly and not impact existing neighborhoods much.
22.	X		Many flow options build the east bridge which looks shorter and ultimately less expensive to build, being over less water
23.	X		
24.	X		I think it has the least impact on existing neighborhoods and spreads out the traffic.
25.	X		The research/report seems clear in supporting it.
26.	X		I find the information presented compelling enough to prefer this route over the others; better distribution to flow of traffic south of Chinden Blvd.
27.	X		I think Alt. 6 will do the best job in and dispersing traffic from 55 to the south side of the river, by going to both Cloverdale Road & Mt. View/Maple Grove.
28.			
29.			
30.	X		The distribution of traffic flow looks good. I think it will help both Eagle Road and Glenwood.
31.	X		I prefer the Cloverdale and Joplin Road connections.

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32.	X		Because less traffic.
33.	X		#6 does a better job of distributing traffic to all parts of Boise Valley.
34.		X	The proposed concentrates traffic at areas with a great number of schools including Centennial and Capital H.S. – that is <u>not</u> where you want high traffic corridors. The 5-Mile option avoided that, provided one N-S route that efficiently met the goals of Eagle and Glenwood traffic mitigation. Unfortunately a very vocal minority group (W. Bench Neighborhood Assoc.) was able to get their way over the silent majority.
35.			
36.			
37.	X		Best option for all involved.
38.			
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East vs. West Crossing

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Which crossing option do you prefer, East or West?

#	East	West	Comments
1.			
2.			
3.			
4.			
5.			
6.			
7.	X		There is already a bridge across the river there.
8.			
9.	X		Less cost, less construction required.
10.			
11.			
12.			
13.		X	Less impact, it seems, to river wildlife environment.
14.	X		Less bridges
15.	X		But I would like to see it hook up to Five Mile Road, not Mountain View Dr.
16.		X	Connections across are more direct and would allow more room in case of flooding. The water will have more room to get through and block it further upstream.
17.		X	<ul style="list-style-type: none"> • More direct route leaves more undisturbed river bank. • Access needs to be provided for residents that currently live on Joplin Road. • Warm Springs Creek is really the drain ditch of District #4.
18.			No preference.
19.		X	Lessens flood concerns.
20.	X		Less impact to vegetation and species; less cost
21.			Uncertain at this time, but leaning towards east.
22.	X		As stated before.
23.	X		
24.	X		It has less impact on riparian habitat, is more direct, and less expensive
25.		X	Seems best.

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26.	X		Less impact to wildlife, lower cost, more “direct”.
27.	X		The east alternative seems to help maintain larger blocks of undisturbed areas for wildlife, while allowing for mitigation in already disturbed land. _____ not allow for local future development is good. I do not think any off road should come off Connector; it should only be a thru road.
28.			
29.			
30.	X		Over the water span is shorter.
31.		X	I think the future connection to Riverside Dr. and all the developments to the west up to Eagle Road, will be easier and more feasible. I think this makes the crossing more effective and viable for developments north of the river and south of Highway 44.
32.	X		More direct route for traffic flow.
33.	(no check)		I prefer whichever one comes out less cost after <u>ALL</u> studies are complete, as floodway encroachment – and bridge type.
34.			
35.			
36.			
37.		X	Bridge is more sound/secure – less chance of flooding causing issues.
38.			
39.			
40.			
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General Comments

Transcription

Jan. 18-March 3, 2008

Comments are transcribed verbatim.

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ACHD Testimony Forms	
1.	I recommend that ACHD proceed with a preliminary design to determine route and begin property acquisition. Unless major funding is obtained or a major project such as the East Parkcenter Bridge can be delayed, it appears that construction will be delayed for several years.
2.	I think the connection of Highway 55 to Chinden Blvd. brings an unnecessary amount of traffic across one of the few open spaces left in the Boise/Eagle area. We had our chance with Eagle Road and along comes 10 stop lights – there goes your chance to send more traffic north and south – I think the same thing would happen here. Therefore, I am for the No Build Alternative.
3.	Very few urban areas have a major gap in river crossings like that found between Eagle Road and Glenwood. There is a substantial need for this project and the relief it would bring to the increasing congestion on the existing crossings. An investment in this crossing would not only disburse traffic better, but would likely be less expensive than expanding the existing bridges and widening roads as would otherwise be necessary to handle the growing traffic from a growing northwest for Ada County, Gem County, Boise County and northeast Canyon County.
4.	<p>ACHD Three Rivers Crossing Project team:</p> <ul style="list-style-type: none"> • I appreciate all of the work the team has put into investigating the alternative approaches for this crossing. • I live on the North side of the river and will personally benefit from an alternate route. • The project team is recommending alternative number 6. I can see some of the benefits of this approach, but I do not understand the logic behind intersecting the eastern Chinden connection at Mountain View road. • Mountain View is not a North-South route designed to carry any volume of traffic so this additional intersection and stop light will be for the purpose of routing traffic east and west. The downfall here is you have added one more stop light to an already "stop light rich" route. The team should reconsider the addition of one more stop light. Taking the eastern route to Five Mile makes much more sense. If you have concerns about connecting to Five Mile then consider making Five Mile one way just north of HP's east gate or have this connection move up to the HP Main entrance light. • I think the concern about having to widen Five Mile is valid but I see it as inevitable. The project team should recognize this city is growing and Five Mile will eventually need to be widened. This feels like the Curtis widening discussion all over again. • Don't underestimate the need. • Thanks for the opportunity to give input.
5.	The Federal Highway Administration requires no net loss of all wetlands under Executive Order 11990. All of the proposed alternatives of the Three Cities River Crossing Project would cross

	<p>the Boise River, thus impacts to wetlands along the river and emergent wetlands are unavoidable. Wetlands are crucial to the river ecosystem and surrounding ecology by providing the following functions identified in the Draft Environmental Impact Study: flood-flow alteration, groundwater discharge and recharge, production export/food chain support, recreation/education potential, sediment stabilization/removal, aquatic diversity/abundance, toxicant retention, uniqueness, wildlife diversity/abundance for breeding/migration/wintering, and provision of habitat for potentially 12 of the 37 special status species for Ada County.</p> <p>The Draft Environmental Impact Study indicates that depending on the alternative chosen there could be up to 1.7 acres of forested wetlands, 0.7 acres of scrub, 0.7 acres of emergent and/or 13.9 open water wetlands affected.</p> <p>Should in-lieu mitigation be the form of mitigation that occurs with the Three Cities River Crossing, Garden City feels as though the mitigation of these wetlands should be on the Boise River in an area that is in close enough proximity to the subject project to potentially mitigate for the loss of wetland functions including habitat for displaced species and degradation of the area's water source.</p> <p>A second concern that the City has is storm water treatment. The Draft EIS document indicates that there are several different approaches to capture and treat storm water, but does not indicate the preferred method at this point.</p> <p>Garden City would be willing to partner with ACHD in both wetland mitigation and storm water treatment.</p> <p>Thank you for your time and consideration.</p>
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Public Hearing Comment Forms - Other Comments	
6.	
7.	I think you have already spent way too much money on this project. I think the cost of these open houses and public hearing is driving the cost of our new and upgraded roads up way too far. The ACHD needs to spend more money on labor, equipment and dirt, and way less on all the people doing these feel-good shows. This project should be complete now, not just in the planning stage.
8.	
9.	Thanks.
10.	
11.	
12.	
13.	My option was a cut at Five Mile Road feeding into a bridge over the whole river - but too expensive.
14.	The road needs to go from Cloverdale and Five Mile, as more vehicles use Five Mile versus Mt. View - Five Mile and Cloverdale are closer to HP.
15.	

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16.	I think they are waiting too long to get the project done. Traffic on Glenwood St. & Eagle Rd. is backed up now and relief is needed.
17.	Why are you waiting so long?
18.	
19.	One concern I have living off Cloverdale Road is the potential increase in traffic. I would like to see Cloverdale widened to five lanes.
20.	
21.	
22.	Don't wait - it gets too expensive!
23.	
24.	
25.	
26.	
27.	
Post-Hearing Comments	
28.	My wife and I were unable to attend the meeting February 13th. We are stating our opinion that this is a vital project, and is already overdue. For that reason we support whichever options allow completion at the earliest possible date as priority one, lowest total cost as priority two. As a result of those overriding criteria, we support whatever EIR actions best meet those two goals.
29.	I would urge decision makers at ACHD, etc. to NOT build any of the proposed Three Cities River Crossing alternatives. There would be a high environmental impact regardless of which alternative was chosen. ACHD should focus its budget and time on projects that promote a mass transit system for the Treasure Valley, as this would be the best option for growing cities like Boise, and would have the best long-term benefits to handle an ever-increasing population of commuters with the least amount of environmental impacts. If ACHD does decide to go ahead with construction of the Three Cities River Crossing (which I am against), I would urge the department to please proceed with the plan that impacts wetlands, wildlife, vegetation, and water quality the absolute least. Preserving our natural resources within the city is much more important than having more "convenient" roadways for commuters.
30.	
31.	Thanks for putting this open house together and for the information.
32.	The company that gets the contract should have a deadline to be completed. If it is not completed by a certain date - that company should be responsible for any delay with fines etc. If the company goes over budget then they should be responsible for a portion of the extra expenses. The people should have a vote in this project, instead of the exclusive decision of the mayor or the commissioners.
33.	
34.	This project will be a big step backward for the thousands of pedestrians and bicyclists that commute to the dozen impacted schools each day. Congestion and safety events the area will greatly increase as a result of this project. ACHD should consider the 5-mile route as your

	<p>engineers originally proposed.</p>
35.	<p>Thank you for holding a public meeting on February 13, 2008.</p> <p>I disagree with Alternative 6 as the recommended alternative. I prefer Alternative 8 that carries traffic from State St. to Cloverdale and Five Mile Roads. This provides more direct routes, better equalizes traffic on Cloverdale and Five Mile, and is closer to the original plan. Also, it allows traffic to flow down Five Mile which may (should!) have freeway access in the future.</p> <p>If you keep Alternative 6 as the plan, please add the following statement to your Draft Environmental Impact Statement: The intersection of Chinden Blvd. and the new incoming roadway (near Mountain View Dr.) should be a T-intersection to prevent vehicles from accessing Mountain View Dr. directly.</p> <p>I encourage a bridge design similar to that of the West Park Center Crossing and the Veteran's Way Bridge which have substantial concrete barriers between the WIDE pedestrian sidewalk area and the traffic lanes. I request bike lanes as well, although the protected walkway is of more importance for the safe travel of younger bicyclists in particular. Please continue to prioritize the building of roadways that are safe to walk and bike along. This improves our great city and helps relieve traffic congestion!</p> <p>Again, thanks for your time and attention.</p>
36.	<p>I am writing on behalf of my client, Pioneer Irrigation District ("District"). These are the official comments of the District regarding the Draft Environmental Impact Statement for the Three Cities River Crossing Study ("Draft EIS")</p> <p>The District provides irrigation water deliveries to over 34,000 acres of land, primarily in Canyon County, Idaho. The Phyllis Canal, the District's main water delivery canal, diverts water from the South Channel of the Boise River downstream of the proposed bridge crossings which are described in the Draft EIS. Unfortunately, the Draft EIS makes no mention of this fact. It also makes no evaluation of the necessity of protecting the channel configuration and water carrying capacity of the South Channel to guarantee that the projects cause no interference with the water rights of the District and its ability to deliver water from the South Channel to the landowners of the over 34,000 acres it serves. This oversight must be corrected.</p> <p>Any interruption or interference with the South Channel of the Boise River by construction activities for these projects would cause major economic damages within the District if water deliveries are interrupted. Detailed analysis of these possibilities must be included in the final EIS. Failure to adequately evaluate this issue will render the final EIS fatally defective under the statutory provisions of the National Environmental Policy Act and applicable court decisions.</p> <p>The District hereby offers to assist the project sponsors in the proper evaluation of these issues in the final EIS. Please direct all communications on this critical matter to my attention.</p> <p>Thank you for your anticipated cooperation.</p>

	<p>Follow up comment submitted March 26, 2008</p> <p>I provided you with correspondence, on behalf of Pioneer Irrigation District, concerning the Three Cities River Crossing Study/Draft Environmental Impact Statement on February 27, 2008. The letter supplements that correspondence.</p> <p>Additional concerns have been identified. All of the options for consideration in the study implicate necessary access easements owned by Pioneer. These access easements must be protected in any construction project, particularly one of the scope and duration of the proposals described in the study. Because of the recorded easements granted by Pioneer, its property interests in these easements are protectable interests under the Idaho and United States Constitution. Therefore, any Environmental Impact Statement for the proposed Three Cities River Crossing Project must evaluate impacts upon these property interests and avoid or resolve any conflicts with the continued use of the easements by Pioneer.</p> <p>Failure to properly evaluate these considerations will invalidate the final Environmental Impact Statement.</p> <p>Please direct all communications on these matters to my attention to the address listed above.</p>
37.	
38.	<p>Please find the attached testimony for the record. Of note is the fact that these two land owners represent ownership and leasehold interest in nearly all the private land necessary for the 3CRX right of way acquisition. They both are committed to support the “western alignment” of the project.</p> <p>Please note that the project is partially supported and the owners understand that the project will greatly impact their businesses.</p> <p>In specific review of the project, while the owners have grave concerns over the impact to their business, they have supported the “preferred route #6”, only if the “western alignment” is utilized, due to the following issues:</p> <ol style="list-style-type: none">1. The location of the “eastern alignment” creates substantial impacts on the property and existing business. Mandatory relocation of the business due to the “eastern alignment” would put the owners out of business.2. The “western alignment” not only has the least impact on the property and operation, but also the leasehold interest in aggregates on the approximately 140 acres to the East / Southeast which hold substantial value to 7M / Mike’s Sand & Gravel.3. The discussion of the “great blue heron rookery” noted in Chapter 4 Environmental Resources, Impacts, and Mitigation, pages 4 – 89 & 4 - 95 thru 4 - 99, is of great concern in as much as there has been a great deal of weight placed on this habitat factor in directing the “eastern alignment”. Having personally toured the site with both State and

HDR biologists during the winter / spring of 2006, both biologists noted that the heron had relocated, and no heron were seen occupying the old “rookery. Furthermore, the life of a “heron rookery” may only be twenty (20) years (which apparently has run its life), so to select the location of an alignment based upon a now or soon to be extinct “heron rookery” seems to be severely flawed. The draft EIS further states (ref. page 7-9 / footnote 1) that the heron are “able to habituate to non-threatening repeated activities like highway traffic”, again something that diminishes the weight of the rookery issue relative to the selection of the alignment.

4. The City of Eagle in conjunction with ADA County (Emergency Services) and the Homeland Security Department is preparing to submit a grant application to organize and process the redrafting / remodeling of the 2003 FEMA cross channel floodway (connection of the overflow from the South Channel to the North Channel). The grant proposal would include some of the benefits of the redesign of the overflow channel to the 3CRX alignment alternatives identified in Table 7-1, footnote 2 & 3. This approach also supports the goals of the project team as identified in the second paragraph on page 7-1, and the cost savings noted on table 7 - 1.
5. While both “alignments” will have a substantial impact on operations, the “western alignment” would create the least impact, allowing the existing base of operations to remain. Either alignment has great impact on existing mineral reserves of the landowner, who has a leasehold interest in the property impacted to the East / Southeast.
6. With a focus on the potential wildlife, wetland, floodway, and other habitat mitigation, the ability to concentrate as large a mass of open space as possible (versus bisecting the open space), supports the “western alignment” (ref. tables 4-15 & 4-21). Again, the expanded view of the area which would be “contiguous” on the north side of the North Channel to the south side of the South Channel (east to west) is substantial.
7. Knowing, and acknowledging that the landowner has placed a large amount of land into a conservation easement (ref. Figure 4 - 34); the opportunity for substantial contiguous open space, including the eastern Island area and area north of the south channel is not to be overlooked. The conservation easement, when combined with the floodway area and tip of Eagle Island noted in Figure 4-31, illustrates the sizeable area that can be combined. I strongly believe this approach (“western alignment”) provides a much greater area for set aside, than bifurcating the area with the “eastern alignment”.
8. There is a dramatic difference in the impact to the emergent and scrub-shrub wetlands (ref. table 4 - 15), both key wetlands in the project area. Along with minimizing impacts, the “western alignment” substantially reduces the need for offsetting mitigation (area / \$\$\$ requirements).
9. The impacts to the floodplain and floodway are also greatly diminished by use of the

	<p>“western alignment” as noted on Table 4 - 20, along with the required mitigation which is dramatically illustrated in Table 4 - 21. This further translates to the habitat impacts noted in Table 4 - 24.</p> <p>With regard to the eventual road construction, there are the following noted concerns:</p> <ol style="list-style-type: none">1. In anticipation of final mineral extraction, and future land use, the “western alignment” creates the ability to better utilize the property for eventual development, and provide additional future open space and habitat.2. There are several implicit issues in the roadway design, and the land that will be required for the right of way. 7M / Mike’s Sand & Gravel expects any residual land parcels will be fully accessible from secondary roadways, will be of reasonable size and shape for development as contemplated by the ADA County Comprehensive Plan, and shall not have any undo constraints, restrictions or other impacts to them.3. As the impact on the land is so substantial for the “eastern alignment”, the land owners are very motivated to work with the project and support the “western alignment” by discussing alternate habitat, wetland and other mitigation.
39.	<p>Please find the attached testimony for the record. Of note is the fact that these two land owners represent ownership and leasehold interest in nearly all the private land necessary for the 3CRX right of way acquisition. They both are committed to support the “western alignment” of the project.</p> <p>Please note that the project is supported and encouraged by the landowners, who have been cooperative and working closely with ACHD and the City of Eagle in the pursuit and processing of this project. The owners understand that the project will greatly impact their businesses, and will need to relocate part or all of the operation.</p> <p>In specific review of the project, the owners have supported the “preferred route #6”, but also wish to note their extreme preference for the “western alignment” due to the following issues:</p> <ol style="list-style-type: none">1. The location of the “eastern alignment” creates substantial impacts on the property (and adjacent property) specifically where the roadway constricts at the SW corner of Lakewood Village. Furthermore the width that is available for the Highway 55 extension and any surface / access roads which will be required to maintain access to the SE portion of the owner’s property north of the north channel of the Boise River, will either completely utilize or exceed the available width between the property lines and the floodway (ref. figure 4-33)2. In the Draft EIS, there is no scenario presented which acknowledges the potential taking of southeast portion of the land north of the north channel, due to insufficient right of way or access with the “eastern alignment”.

3. There is no section or discussion or mitigation defined in the 3CRX “Draft EIS” (December 2007) that addresses “access” to the island portion of the land owned by OldCastle, MMG and Idaho Concrete. Presently there is access via a bridge from the land on the north side of the North Channel of the Boise River to the land on the south side of the North Channel of the Boise River. Should the Highway 55 extension take the “eastern alignment”, the existing bridge and any access to the nearly 150 acres of fee owned property will be removed (with no proposed means of replacing the access). Additionally, the removal of the existing bridge will eliminate access to the island for life safety, maintenance, and other vehicles (ref. figure 4-33).
4. The discussion of the “great blue heron rookery” noted in Chapter 4 Environmental Resources, Impacts, and Mitigation, pages 4 – 89 & 4 - 95 thru 4 - 99, is of great concern in as much as there has been a great deal of weight placed on this habitat factor in directing the “eastern alignment”. Having personally toured the site with both State and HDR biologists during the winter / spring of 2006, both biologists noted that the heron had relocated, while observing no heron occupying the old “rookery. Furthermore, the life of a “heron rookery” may only be twenty (20) years (which apparently has run its life), so to select the location of an alignment based upon a now or soon to be extinct “heron rookery” seems to be severely flawed. The draft EIS further states (ref. page 7-9 / footnote 1) that the heron are “able to habituate to non-threatening repeated activities like highway traffic”, again something that diminishes the weight of the rookery issue relative to the selection of the alignment.
5. With a focus on the potential wildlife, wetland, floodway, and other habitat mitigation, the ability to concentrate as large a mass of open space as possible (versus bisecting the open space), supports the “western alignment” (ref. tables 4-15 & 4-21). This combined with the present grant preparation effort to modify the floodway by the City of Eagle, will substantially reduce the cost of the “western alignment”, while minimizing several impacts. Again, the expanded view of the area which would be “contiguous” on the north side of the North Channel to the south side of the South Channel (east to west) is substantial.
6. The City of Eagle in conjunction with ADA County (Emergency Services) and the Homeland Security Department is preparing to submit a grant application to organize and process the redrafting / remodeling of the 2003 FEMA cross channel floodway (connection of the overflow from the South Channel to the North Channel). The grant proposal would include some of the benefits of the redesign of the overflow channel to the 3CRX alignment alternatives identified in Table 7-1, footnote 2 & 3. This approach also supports the goals of the project team as identified in the second paragraph on page 7-1, and the cost savings noted on table 7 - 1.
7. While both “alignments” will have a substantial impact on both the concrete and precast operations, the “western alignment” would allow the least impact due to the size of the residual contiguous space left to the east of the highway extension.

8. Knowing, and acknowledging that all the land west of OC's western property line on Eagle Island is slated for continued residential development; the opportunity for substantial contiguous open space, including the area south of the south channel is not to be overlooked. As noted on Figure 4-34, there is a large conservation easement located just south east of the tip of Eagle Island, which combined with the floodway area noted in Figure 4-31, illustrates the sizeable area that can be combined. I strongly believe this approach ("western alignment") provides a much greater area for set aside, than bifurcating the area with the "eastern alignment".
9. There is a dramatic difference in the impact to the emergent and scrub-shrub wetlands (ref. table 4 - 15), both key wetlands in the project area. Along with minimizing impacts, the "western alignment" substantially reduces the need for offsetting mitigation (area / \$\$\$ requirements).
10. The impacts to the floodplain and floodway are also greatly diminished by use of the "western alignment" as noted on Table 4 - 20, along with the required mitigation which is dramatically illustrated in Table 4 - 21. This further translates to the habitat impacts noted in Table 4 - 24.

With regard to the eventual road construction, there are the following noted concerns:

1. The distance to either stop light location (only point of access) in either "alignment" is excessive and restrictive based upon existing configuration of Highway 55 / Eagle Road. By contrast the distance from the "bypass" to the stop lights (headed south) on Highway 55 / Eagle Road are approximately 345' and 870' respectively, however the proposed "Possible Access Points" on the north parcel are nearly 1,700' (double to quadruple the existing distances). The locations proposed severely impacts the property by:
 - a. Inability to connect to possible cross connector to east and west at a functioning intersection location
 - b. Additional congestion / problems on the "eastern alignment" due to restricted / constricted dimensions to the property line / floodway line
 - c. Consumption of what is probably the most valuable land on the site by nearly eliminating any development between the roadways connecting to the "access points" and the floodway setback.
 - d. Potential impact to development by possible creation of "single loaded" roadway due to floodway setback / access road location.
2. There are several implicit issues with regard to the roadway design, and the land that will be required for the right of way. OldCastle / Idaho Concrete expects any residual land parcels will be fully accessible from secondary roadways, will be of reasonable size and shape for development as contemplated by the Eagle City Comprehensive Plan, and shall not have any undo constraints, restrictions or other impacts to them.

	<p>3. While the issues of mitigation and restoration for this type of project are implicit and understood by the landowner, no discussions to date have been had with regard to the vast amount of land designated for the alternatives noted in Figure 7 – 1. There is an area which seems to have been left out of the potential mitigation which is very valuable with regard to wetland mitigation. The area in the southwest portion of the island property identified as OldCastle below the “Lemp Canal” was stripped for possible mineral extraction; that potential mining activity has been eliminated. However, there are two existing delineated wetland areas within the (light tan) area, which could / should be utilized as the other areas for habitat or wetland restoration. While there may be other areas available or other mitigation options, the proposed use of only the OldCastle / Idaho Concrete property for offsets could be incredibly onerous. Any potential loss in ability to utilize the island portion or other portions of the property for compensatory storage for development of the land north of the North Channel could carry huge financial impacts to the property. On the greater scale and outlook, the ability to diversify and expand the areas of mitigation are substantially greater using the “western alignment” due to contiguous habitat area located on both sides of both channels.</p>
40.	<p>Thank you for the opportunity to comment on plans for the Three City Crossing. I compliment ACHD staff for their professionalism and thoroughness in hosting the February 13, 2008 public hearing held in Garden City. My comments pertain to the overall project and its impact on the environment, land use and value, traffic disbursement, and neighborhoods.</p> <p>I understand that the primary goal of this road would be to ease future traffic on both the Eagle Road and Glenwood Street bridges over the Boise River. However, for the tens of millions of dollars this road would cost, the goal ought to be bigger in scope by seeking to more evenly disburse traffic, preserve land for development and other uses, and give more ways of accessing cities and neighborhoods in west central Ada County. With this expanded goal in mind, I believe the wrong alternative has been chosen. Here are my primary reasons why:</p> <p>Alternative six would create increased traffic on westbound and eastbound Chinden and create six stops from Glenwood to Cloverdale, which is less than three miles.</p> <p>Alternative six will split traffic moving south on the Three City Crossing road to either a new intersection with Chinden at Cloverdale on the west or Chinden at Mountain View on the east. From these two intersections much of the traffic will turn onto Chinden and proceed either east or west. If traffic proceeds west from the Cloverdale intersection there is a good chance that most of it will end up back on Eagle Road heading south. If traffic proceeds east on Chinden from the Cloverdale intersection it most likely will end up turning south onto Five Mile. If traffic proceeds east on Chinden from the Mountain View, which is really the only option since Mountain View is not capable of handling a large amount of traffic, it most likely will end up turning south on Maple Grove, or possibly south on Glenwood to Cole, Curtis or Orchard. Also at the intersection the new road would meet Chinden on the east, many drivers would use Mountain View as a short cut to Maple Grove. Mountain View is not safe for this</p>

	<p>use. In summary, alternative six would create two, new, awkward, dangerous intersections with traffic lights at Chinden and Cloverdale and Chinden and Mountain View which increase traffic on Chinden and in many cases put traffic back on Glenwood and Eagle Road.</p> <p>Also, with the addition of the two new intersections, there would be a total of six in less than three miles along Chinden—Glenwood, Maple Grove, Mountain View, Five Mile, HP, and Cloverdale. I believe it would be preferable to take the Three City Crossing road from the intersection of Highway 55 directly south to Five Mile and not build the new road at all? Taking it to Five Mile would create one well-laid-out, four-way, safe intersection at Chinden and Five Mile where traffic can proceed south, west, or east. It would eliminate one of six stops in a less than three mile section of Chinden. By not building the road at all, maybe efforts to expand State Highway 16 could accelerate?</p> <p>Alternative six is a poor use of land compared to other alternatives.</p> <p>Alternative six creates an isolated, “island” of land between the Three City Crossing east and west split and Chinden, which would have few uses and a lower value than land that bordered a direct route to Five Mile.</p> <p>Alternative six does not take into Consideration Garden City’s Comprehensive Plan</p> <p>While the recommended alternative is compatible with the Boise and Eagle Comprehensive Plans, it is not compatible with Garden City’s plan. Garden City’s Comprehensive Plan calls for improving the Chinden corridor through the city by making it more attractive and pedestrian friendly. Adding more traffic and congested traffic lights along Chinden is counter to Garden City’s plan. It appears that wishes of Garden City’s population, being the smallest of the three cities making up the Three City Crossing, may have been overlooked in favor of the others?</p> <p>I believe the two alternatives that either link Highway 55 directly to Chinden at Five Mile or not building the road at all are both preferable to the Alternative chosen.</p> <p>Thank you for allowing me to comment on this important topic.</p>
41.	<p>It is a terrible idea to launch traffic up from State Street and onto Cloverdale Road.</p> <p>Eagle Road, the traffic moving <u>highway</u>, is only one mile to the west of Cloverdale Road. Two super thoroughfares are not needed in such a close proximity. Eagle Road is the thoroughfare and the means to move traffic north and south in this vicinity.</p> <p>You cannot fail to properly plan and then subsequently bore through established neighborhoods; neighborhoods that have many schools very nearly located to the high volume super thoroughfare that you are proposing for Cloverdale road.</p> <p>There are <u>eight</u> schools located on or very near Cloverdale road between Chinden Street and</p>

Emerald Street. These schools are: Joplin Elementary, Centennial High School, Pioneer Elementary, Frontier Elementary, Ustick Elementary, Maranatha Christian School, Boise Valley Adventist School, Lewis and Clark Middle School. Also many kids, including my own, must cross Cloverdale road to ride their bikes to the West Boise YMCA. Additionally you've got very young drivers pulling on of off of Cloverdale to attend ITT Technical Institute. This does not include all of the schools and high child and youth areas extending south of Emerald on Cloverdale that will also be heavily impacted.

The children that attend these schools spend one half of their school year walking and riding to school in the dark. It is very hard to see them. I have yet to see a child in this area riding to school with a headlight or tail light on his or her bike. Many of the children are carrying musical instruments, quite a few of them are riding a bike holding a musical instrument and carrying a heavy book filled backpack on their backs. Often times it is very cold and they have hoods over their heads which makes their peripheral vision and hearing exceedingly poor.

Mark my words, children will get hit by cars and trucks and die if you launch the State Street traffic up onto Cloverdale Road with the Three Cities River Crossing project. Inexperienced young drivers who live in the many, many neighborhoods along Children will pull out on to Cloverdale into oncoming traffic and also die.

Lack of responsible planning and perhaps gross negligence has created traffic congestion. It is unconscionable to try to put a post haste fix on this problem by boring through established neighborhoods full of young people. This is not a proper way to take care of the errors, negligence, and sins of the past.

Decision makers on this project must face up to the fact that they made gross errors and used poor judgment in the past and must come up with viable, practicable solutions. This new alternative solution will probably cost more than the easy bore through the existing neighborhood solution.

Eagle road should be turned back into the traffic moving highway that it is supposed to be. Why are there no frontage roads along Eagle Road to allow better flowing traffic to the many retail establishments that have been allowed to be built along the road that was supposed to be a traffic moving highway? Even small towns with little traffic volume have frontage roads. Would not a high volume road in Boise need frontage roads even more than low volume small towns and rural areas? It appears that no one is running the show. It seems as though no traffic engineers with any training or experience have been put on the road projects.

Why was Eagle Road allowed to be turned into a four mile long clogged retail park?

Plausible solutions may include: building a highway above Eagle road, or reclaiming land for frontage roads. This will be more costly but they are far better solutions than the easy bore through the high density neighborhoods and kill the youth solution.

	<p>If you are determined to bore through existing neighborhoods it makes far better sense to turn Five Mile road into the high volume traffic moving north south road. There is only one school along the stretch of Five Mile from Chinden to Executive. You reduce your risk of killing youth by 87% over the Cloverdale option (1 school instead of 8 schools). Also, Five Mile is two miles from the Eagle road traffic moving thoroughfare. It makes no sense to put the new thoroughfare onto Cloverdale Road, just one mile from the traffic moving Eagle Road.</p> <p>At a very minimum, you would need many stop lights so that people can get in and out of their existing neighborhoods or people will die trying to pull out onto the proposed Cloverdale super expressway. This would include such streets as Goldenrod, Edna, etc. You may say that this is a bad idea because it will slow traffic down. Well it is a much worse idea to create a situation in which people are not allowed a safe means to get out of their neighborhoods. If people cannot safely get in and out of their existing neighborhoods without stoplights, and if stoplights hinder the flow of the proposed Cloverdale expressway, then this clearly indicates that the Cloverdale super expressway/thoroughfare scenario is not reasonable and feasible option.</p> <p>There does not appear to be a sensible, and safe way to make Cloverdale Road a viable and safe alternative to move traffic north and south. One must consider this a moral issue as young lives will be taken away if this project goes through. Mistakes have been made in the past, but do not compound the former errors by taking a quick, easy, low cost, bore through the existing neighborhoods solution. The proposed option of launching traffic from State Street up onto Cloverdale Road must be eliminated from the options.</p> <p>Please include this testimony as part of the public record for this study.</p>
42.	<p>I would like to add my personal thanks to ACHD, HDR and the rest of the members of the Three Cities River Crossing team for their open access and support, as well as their inclusion in the initial discussions and studies.</p> <p>Lastly, I would hope that the design of the bridges/roadway will follow some of the Boulder, Colorado roads and bridges with clean, design creating visually open railings thus providing as little impact on the land as possible (“less is more” approach).</p>
43.	<div style="text-align: center;">  <p>UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 1200 Sixth Avenue Seattle, WA 98101</p> <p>March 3, 2008</p> </div> <p>Reply to Attn of: ETPA-088</p> <p style="text-align: right;">Ref: 04-004-FHW</p> <p>Mr. Ross Blanchard</p>

Federal Highway Administration
Idaho Division Office
3050 N. Lakeharbor Lane, Suite 126
Boise, Idaho 83706

Dear Mr. Blanchard:

The U.S. Environmental Protection Agency (EPA) has reviewed the **Three Cities River Crossing Draft Environmental Impact Statement (DEIS)**. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The Federal Highway Administration (FHWA), the Idaho Transportation Department (ITD), and the Ada County Highway District (ACHD) propose to construct a new roadway crossing of the Boise River at the juncture of the cities of Boise, Eagle, and Garden City in Ada County, Idaho. The project purpose and need is "...to increase surface travel capacity across the Boise River and link the intersection of SH-55 and State Street (SH-44) to Chinden Boulevard (US 20/26) between Glenwood Street and Eagle Road." The five action alternatives presented, each of which has a west and an east crossing option, are all variations in alignments that would make these connections. Alternative 6 is identified as the preferred alternative, but no preference is identified for a preferred river crossing option.

We commend FHWA, ITD, and ACHD for their efforts in preparing this DEIS. We think the reader/user-friendly question and answer format is helpful and largely effective. Our only suggestion is that its use may at times foster a tendency to omit necessary technical information. We also appreciate the fact that ACHD conducted a Delphi process to analyze the potential indirect effects of the project on travel and growth. This is a positive step forward to analyze the indirect effects of transportation projects that can serve as an example for future projects.

Our key concerns with the EIS pertain to air quality, including ozone, particulate matter, air toxics, and to wetlands, aquatic resources, floodplains, water quality and stormwater management, and the need to fully address mitigation for these impacts. Other needs include additional background information on purpose and need, providing ecological connectivity to reduce wildlife road kill, clean up and re-use of hazardous waste sites, and potentially more government to government consultation with tribes. Our detailed comments regarding these issues are enclosed.

In light of the above concerns, we rate the DEIS as EC-2, Environmental Concerns, Insufficient Information. An explanation of this rating is enclosed. If you have questions or would like to discuss these comments, please contact Elaine Somers of my staff at (206)553-2966 or at somers.elaine@epa.gov, or John Olson in our Boise Operations Office at (208)378-5756 or at olson.john@epa.gov. We appreciate being involved in this project, and look forward to continued participation. Thank you for the opportunity to offer comment.

Sincerely,
/s/
Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures

cc: Mr. Wade Christiansen, ITD
Ms. Lisa Applebee, ACHD

**U.S. Environmental Protection Agency
Detailed Comments for
Three Cities River Crossing Draft EIS**

Purpose and Need

The Purpose and Need calls for increasing surface travel capacity across the Boise River in a specific location, which is based on the results of the Bench/Valley Planning Study. It is important to honor the results of planning studies, and this can be facilitated by providing information about the nature and quality of the study. For example, it would be helpful to know whether the study is current and remains relevant, whether it was conducted in an inclusive manner with adequate public involvement, and whether or not environmental concerns were adequately considered during planning. The provisions of SAFETEA-LU Section 6001, once fully implemented, should help to improve integration of NEPA and transportation planning. For studies not conducted pursuant to these provisions, it would be helpful to include a brief summary about the planning study as background information to the Purpose and Need.

Recommendation: In the Final EIS, include a brief summary of the Bench/Valley Planning Study that describes:

- When and why the study was conducted;
- Who was involved;
- The range of alternatives that were evaluated;
- What, if any, environmental issues were considered/analyzed;
- What sources of data/information were used to inform the analysis; and
- The outcome and its supporting rationale.

Range of Alternatives

Transportation System Management(TSM) and Mass Transit Alternatives

The DEIS states that, in accordance with FHWA Guidelines, TSM and Mass Transit alternatives were considered. We are concerned, however, that no information about these alternatives, which were eliminated during the screening process, is provided in the DEIS. For

alternatives that were eliminated from detailed study, the EIS should “...briefly discuss the reasons for their having been eliminated” (40 CFR Part 1502.14). The DEIS states that the traffic forecast model assumes 25% of travel would not be done by single-occupant vehicles (SOVs), but no alternative describes the means by which this percentage would be achieved. All action alternatives have roadway design that accommodates bicycles and pedestrians, but none include mass transit or transit facilities, HOV lanes, carpooling, or other transportation demand management (TDM) strategies, even though much of the travel is anticipated to be commuter traffic (p. 4-36). Consequently, the proposed project continues to emphasize SOV use as the primary mode of travel.

Recommendation: See the recommendations for Air Quality below.

Environmental Consequences

Air Quality, Air Toxics, Climate Change

Air quality monitoring data show that Boise City is currently in attainment with the PM2.5 standards, but is close to violating the ozone standard. Ozone is created by anthropogenic sources of NO_x and VOCs on warm, sunny days. As discussed above, continued reliance upon SOVs as the primary mode of travel would continue to exacerbate these conditions.

Recommendations:

- Include TSM, mass transit, carpooling provisions, and other appropriate TDM/TSM strategies in the action alternatives in order to address air toxics, and criteria air pollutant emissions, particularly volatile organic carbons (VOCs) and NO_x emissions, which would help keep the Boise area in attainment with the ozone standard, and would also reduce greenhouse gas (GHG) emissions.
- To minimize ozone formation, perform construction work outside the ozone season (May-Oct) or on days when the temperature is below 80 degrees F. Use construction equipment and vehicles that have low emissions of NO_x and VOCs.
- Consider exploring the use of tolls/congestion pricing at strategic locations, and/or the new concept of flexible carpooling, which has the potential to reduce vehicular use by at least 20% if every SOV driver shared a ride at least one day per week.

We appreciate the Mobile Source Air Toxics (MSATs) segment of the DEIS, which includes a good general discussion on this topic. We are concerned, however, that it does not disclose the potential human health risks associated with MSATs nor does it identify the sensitive receptor locations that would be most exposed to vehicular emissions. Vehicular exhaust still presents human health risks with increased vehicular speeds (p. 4-39) because diesel particulate matter, which carries a higher human health risk than other hazardous air pollutants, does not decrease with increasing speed. The proposed project would also include several signalized intersections, all of which would expose sensitive receptors to vehicular exhausts from idling, start-up and acceleration. Also, construction related emissions, for which mitigation measures are readily available and easy to apply, pose health risks for residents, businesses, and construction workers.

Recommendations:

- Disclose sensitive receptor locations for mobile source air toxics. These would include hotspots, such as intersections and construction zones, and facilities such as schools, hospitals, day care centers, nursing homes, ball fields, etc. Disclose the cancer and non-cancer human health effects of MSATs.
- Provide additional construction mitigation measures, such as, requirements for installation of control equipment on diesel construction equipment (particulate filters/traps, oxidizing soot filter, oxidation catalysts, and other appropriate control devices), use of clean fuels, idling limitations, and rerouting of diesel truck traffic away from communities and schools. For more information about air toxics, please contact Wayne Elson of our Air Program office at (206)553-1463.

The DEIS does not address greenhouse gas emissions (GHG) from mobile sources and the associated climate change effects. GHG emissions, approximately half of which come from fossil fueled vehicular emissions, are an environmental impact that should be disclosed in the EIS.

Recommendation: Include in the Final EIS GHG emissions estimates that would occur from the direct and indirect effects of the project, and include mitigation measures as described under Air Quality above.

Wetlands, aquatic resources, and floodplains

We believe the identification of the least environmentally damaging, practicable alternative (LEDPA) should consider all impacts to the aquatic system. Total acreage is a factor but not the only one; all factors related to the aquatic ecosystem, as well as all other environmental consequences as identified and evaluated in this DEIS must be considered in the identification of the LEDPA. Because the Clean Water Act Section 404(b)(1) Guidelines do not allow the discharge of dredged or fill material into waters of the United States for any project other than the LEDPA, identification of the LEDPA in the DEIS is equivalent to identifying the preferred alternative. Based on the information provided in this DEIS, EPA believes that the east river crossing appears to be the LEDPA based on environmental impacts (e.g. less impact to forested wetlands and avoids fragmenting the large block of forested wetland). The benefits of the west river crossing are not factors related to the aquatic ecosystem except for the total wetland acreage impacted, which we do not believe is an overriding factor in this case as described above.

Recommendation: In consultation with the Corps and EPA, identify the appropriate alternative as the LEDPA in the Final EIS.

Scrub-shrub and forested wetlands are described as providing almost identical functions and values (page 4-70, Table 4-16). While this table does not provide a functional assessment of these wetland types, the inference is that they are similar. EPA has found that forested wetlands along the Boise River, especially those in active floodplains with hydrologic

connectivity to the river at high frequency flood flows, are the most important wetland habitat in this area. This is due to the historic loss of this habitat type along the Boise River, the importance of this habitat type to the charismatic wildlife species described elsewhere in the DEIS, the importance of this habitat type to the ecosystem processes in the Boise River, and, perhaps most importantly, the loss of the hydrologic conditions and riverine processes that allow the natural regeneration of the cottonwood forest. An additional factor regarding the importance of forested wetlands is the high degree of uncertainty associated with attempts to restore or establish this wetland type.

Recommendation: In the Final EIS, provide accurate functional assessments of the various wetland types, with emphasis upon the importance of forested wetlands along the Boise River. Efforts to avoid, minimize, and compensate for impacts to this wetland type should be commensurate with the high value of these wetlands, and the uncertainty associated with efforts to restore or establish them.

It is unclear whether or not the east and west river crossings have different risks of pit capture because of their locations relative to the gravel pits in the project area. Also, the west river crossings avoid floodway impacts with a longer bridge. A similar design would be highly beneficial for the east river crossing.

Recommendations:

- Evaluate and disclose the comparative risk of pit capture for the east and the west river crossings.
- Disclose whether the east river crossing could and would be designed similar to the west river crossing.

The DEIS states that the proposed project complies with local floodplain requirements, whose requirements are as strict as or stricter than the requirements of the National Flood Insurance Program. However, Executive Order 11988 on Floodplain Management addresses much more than just the NFIP requirements. As accurately described on page 4-80, the Executive Order also directs federal agencies to restore and preserve natural and beneficial floodplain values and to avoid support of floodplain development. The local requirements do not implement these measures. Compliance with local requirements cannot substitute for the obligations of federal agencies to consider all the factors that need to be evaluated per the EO 11988.

Recommendation: In the Final EIS, disclose the full obligations pursuant to E.O. 11988, and ensure that these as well as the local floodplain requirements are met.

There is no demonstration that the proposed mitigation ratios would provide no net loss of wetland functions and values. In fact, a wide range of ratios have been used throughout Idaho to determine appropriate wetland mitigation efforts. Therefore, more information is needed to establish an appropriate mitigation ratio for this project. Also, in the DEIS, the floodplain mitigation measures all relate to mitigation of hydraulic impacts. However, there

are impacts to other floodplain values as well. The logic for hydraulic mitigation in the floodplain, particularly with respect to “compensating excavation” is unclear. Additional open water pits would seem to increase the risk of pit capture. It also seems that excavated areas that are filled with ground water at all times would provide little or no additional floodplain storage.

Recommendations:

- If ratios continue to be included as a measure of wetland mitigation needs, then the basis for these ratios should be established and documented.
- In the Final EIS, identify and provide mitigation for impacts to other floodplain values.
- Please provide the rationale for the proposed hydraulic mitigation measures.

It is noted that a Conceptual Wetland Mitigation Plan will be developed prior to release of the Final EIS. The DEIS also states that opportunities exist in the project area for environmental improvement and that the City of Eagle has identified the head of Eagle Island as “Eagle Island Special Area”. We believe the Conceptual Wetland Mitigation Plan should have been developed and included with the DEIS in order that all parties, including the public, could have had the opportunity to review the potential mitigation measures and to evaluate the feasibility, practicability, and consequences of these potential measures. While there may be numerous opportunities for potential wetland mitigation efforts in or near the project area, at least two significant factors critical to the success of wetland mitigation efforts are not considered in the DEIS. These factors, the feasibility of implementing wetland mitigation efforts that would provide replacement gains in wetland functions and values and the acquisition/use/long-term protection of the sites, will be major factors in determining whether mitigation measures can compensate for wetland impacts. The uncertainty of these issues renders incomplete and uncertain any attempt to provide assurance about wetland mitigation efforts. We believe that ACHD, ITD, and FHWA should be moving forward at this time to make a firm commitment about wetland mitigation and to identify, design, acquire (through an appropriate real estate instrument), and implement appropriate wetland mitigation efforts.

Recommendation: ACHD, ITD, and FHWA should immediately begin discussions with resource and regulatory agencies about wetland mitigation opportunities and develop mitigation plans in the FEIS that are feasible, that can be implemented, that will replace lost wetland functions and values, and that will provide an assurance of success and permanent protection. We also believe that this information should be provided to the public for meaningful review and comment before it is incorporated into the Final EIS.

Water quality and stormwater management

The DEIS states (p. 4-57) that, stormwater “Retention ponds may be combined with existing ponds in the area; however, some treatment of the stormwater will occur.” There is no analysis or disclosure of the type, concentrations, and volume of stormwater pollutants, or of the environmental effects of combining stormwater with the existing gravel mining ponds in the project area. The gravel ponds likely consist of groundwater that is connected to the

riverine environment where movement and exchange occurs.

Recommendation: The EIS should describe the existing water quality in the gravel pit ponds and the fate and effect of contaminants discharged to them on water quality and the aquatic environment.

Ecological connectivity

The DEIS acknowledges habitat fragmentation and also states (p. 4-97) that road kill would likely increase in the area with implementation of the proposed project. We are concerned that no means to mitigate habitat fragmentation due to the proposed roadway/river crossing has been included. Wildlife crossings are needed for safety reasons to avoid vehicular-wildlife collisions, and to provide for safe movement of terrestrial species. Crossing sites could be provided by designing the bridge to span adequate upland to enable movement of terrestrial species under the bridge, thereby providing a continuous wildlife movement corridor. Fencing would also be needed to guide wildlife to the crossing locations and to prevent entry onto the roadway.

Recommendation: In coordination with IDFG and USFWS, provide ecological connectivity in project design, which provides safe movement under the bridge for terrestrial wildlife, with appropriate fencing.

Hazardous materials

We are concerned that all spilled concrete would be removed from the construction area and disposed of in a waste facility (DEIS, p. 4-112). Cement is in short supply (DEIS, p. 4-126), and it is possible to recycle used and spilled concrete, thereby re-using and conserving resources and avoiding the need for landfill space.

Recommendation: Determine whether there is a concrete recycling facility available to accept spilled or used concrete. If such a facility exists, include a requirement in the Final EIS and ROD that all spilled concrete must be recycled.

The DEIS, p. 4-111, also states that, if necessary, project design would be modified to avoid a contaminated site discovered during design or right-of-way negotiations. We encourage project proponents to view the discovery of a contaminated site as an opportunity to augment project benefits, rather than as something to be avoided. If “brownfield” sites were remediated and re-used, “clean” lands/habitats could be conserved. The community would benefit from the new transportation infrastructure and a cleaner, healthier environment.

Recommendation: Keep contaminated sites within the right-of-way, clean them up, and re-use them for transportation infrastructure, thereby providing multiple community and environmental benefits.

Tribal consultation

The DEIS states (p. 5-13), that the Shoshone-Bannock and Shoshone-Paiute Tribes were

	<p>invited to participate in project planning via letter in February 2004, and a copy of the Cultural Resources Technical Report was forwarded to the Shoshone-Paiute Tribe upon request. The tribes were also sent newsletters, meeting announcements, and copies of the DEIS. In response, the Shoshone-Paiute Tribe requested that they be contacted if human remains or artifacts are found during construction. This outreach has elicited response from the Shoshone-Paiute Tribe, but none from the Shoshone-Bannock Tribes. It is unclear whether adequate government to government consultation has occurred, in accordance with E.O. 13175.</p> <p style="text-align: center;"><u>Recommendation:</u> Include information in the Final EIS that indicates how tribal consultation requirements pursuant to E.O. 13175 have been met.</p>
44.	<p>Good Day,</p> <p>Please accept these comments on the Three Cities River Crossing Draft Environmental Impact Statement. Idaho Rivers United is a statewide river conservation organization representing over 3,500 members, with 1,200 members in the Treasure Valley. Our members use and enjoy the Boise River.</p> <p>The DEIS fails to evaluate the full impact of the project on the private and commercial users of the Boise River. Two outfitters have permits to run commercial trips on this stretch and private floaters use the river regularly. The bridges will change the river running experience – the view will be changed as well as the smell and the sounds. There may be less wildlife and more trash. The use of the reach might increase with greater visibility and accessibility.</p> <p>Activities in the river could also change the river running experience – will woody debris be removed from the river to protect the bridge? Will woody debris accumulate on the bridge structure? How about channel gravel buildup or removal?</p> <p>People (and their equipment) will want to enter and exit the river at the crossings (like they do at Glenwood and Eagle Roads). What accommodations have been made for access and what will the impact be?</p> <p>All of these issues should be examined in full and mitigation must be offered for unavoidable negative impacts.</p> <p>for the rivers,</p>
45.	<p>I am writing to you to express my support of the Three Cities River Crossing Study. Please know that my family and I enthusiastically look forward to the potential new road that would connect the intersection of State Street and State Highway 55 with Chinden Blvd. From our home in Hidden Springs, we commonly find ourselves battling the traffic on Eagle road or Glenwood in order to reach Chinden. Every time we have to do so, we comment out loud, “wouldn’t it make so much sense if Highway 55 continued directly to Chinden?” A future route across the Boise river between Glenwood and Eagle Road would be more than ideal!</p> <p>I understand that Alternative 6 (SH-55 to Mountain View Drive and Mulberry Avenue to</p>

	<p>Cloverdale Road) is the preferred alternative. I have no objection to this particular alternative. I hope, however, that the road will be constructed so the traffic will flow smoothly and efficiently where it splits to the east and west connections with Chinden Boulevard—perhaps on- and off-ramps instead of traffic lights at this intersection. Also, I hope there is thought being given to an eventual connection of this road to I-84. It seems to me that connecting SH-55 to I-84 is crucial to long-term traffic flow enhancement in the valley.</p> <p>Thank you, not only for considering my comments but also for your efforts on this project. I am crossing my fingers that it becomes a reality in the near future.</p>
46.	<p>Dear Ms. Applebee:</p> <p>Meridian City staff supports Alternative 6 (SH-55 to near Mountain View Dr., and Mulberry Ave. to Cloverdale) as the Preferred Alternative for this future bridge and roadway alignment, as identified by the project team. Staff concurs with the rationale stated for identifying the Preferred Alternative in the Draft Environmental Impact Statement Summary. In particular, staff supports Alternative 6 as the Preferred Alternative because it (1) evenly distributes traffic among the neighborhoods south of Chinden Blvd., and (2) provides the highest reduction of traffic on the parallel routes (Eagle Rd. and Glenwood St.).</p> <p>The City of Meridian appreciates that opportunity to comment on the Draft Environmental Impact Statement for this important project.</p> <p>Thank you for your time.</p>
47.	<p>Dear President McKee,</p> <p>Thank you for the opportunity to review and provide comment on the Three Cities River Crossing Draft Environmental Impact Statement. The City of Boise was pleased to be able to participate in this planning and environmental analysis and we believe that our issues and concerns related to land use, travel patterns, roadway capacities, environmental quality and neighborhood protection were adequately considered and addressed. Boise City fully supports that Alternative 6 alignment for the project, as recommended in the Draft EIS.</p> <p>We also understand that no recommendation has yet been made regarding the east or west alignment alternatives for the river crossing. As before, Boise City is comfortable with either of the two proposed crossing locations.</p> <p>Please continue to keep us informed of appropriate review and comment opportunities leading up to formal adoption of the Three Cities River Crossing alignment.</p>