United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
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PEP/NRM

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Mr. Adam Rush
Idaho Department of Transportation
Office of Communications
3311 W State Street
Boise, ID 83703

Dear Mr. Rush:

The Department of the Interior (Department) has reviewed the Final Environmental Impact Statement (FEIS), prepared by Federal Highway Administration (FHWA) and Idaho Transportation Department (ITD), for the proposed realignment of US 95 of Thorncreek Road to Moscow in Latah County, Idaho. The purpose of this project is to improve public safety and increase highway capacity on US 95 south of Moscow between Thorncreek Road (MP 337.67) and the South fork Palouse River Bridge (MPO 344.00). The Department offers the following comments and recommendations for your consideration.

The Department appreciates the FHWA and ITD efforts to address the Departmental comments on the Draft Environmental Impact Statement, including weed control mitigation measures for the potential substantial adverse impact on the Palouse prairie restoration and Spalding's catchfly preservation recovery projects on Paradise Ridge. Palouse prairie is a nationally recognized critically endangered ecosystem and its associated habitats and plant species include the Spalding's catchfly, a listed plant species under an Endangered Species Act, as amended (16 U.S.C. § 1531 *et seq.*). The Federal government, including the U.S. Fish and Wildlife Service (USFWS), has invested considerable funding and effort to protect and restore Palouse prairie habitats which would be impacted by the E2 preferred alternative.

The increased weed pressure is substantial, from the construction and operation that the E2 preferred alternative would have on the Palouse prairie preservation and restoration, and Spalding's catchfly recovery projects on Paradise Ridge. The FEIS is not clear or consistent on the FHWA and ITD commitment to fund and implement a weed management plan for the proposed project in the 0.6 mile weed impact zone. The document states that replanting exposed soils with either native grasses or a seed mix developed will be accomplished in one of three ways: 1) with local weed experts; or 2) with USFWS and NRCS; or 3) using ITD Standard Specification 621. (See FEIS Section 9, Environmental Commitments, pages 277, 282 and 283.) The Record of Decision (ROD) should include a commitment to fully fund as well as provide a clear description of the implementation of a weed management plan in the 0.6 mile weed impact

zone over the life of the proposed project. Including these environmental commitments in the ROD would support the substantial Federal investment in restoring and protecting the Palouse prairie habitat in the Paradise Ridge area and to recover the Federal listed Spalding's catchfly.

Thank you for the opportunity to review this document. Please contact Juliet Barenti at 509-893-8005 or at juliet_barenti@fws.gov, if you have any questions or need additional information regarding these comments.

Sincerely,

for Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

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