

**From:** Robert Beachler <Robert.Beachler@itd.idaho.gov>

**Sent:** Friday, September 4, 2026 3:29 PM (Pacific)

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**Cc:** itipcomments <itipcomments@itd.idaho.gov>

**Subject:** Rathdrum Prairie Area Transportation Study ITIP Comments

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All Concerned,

Thank you for providing comments on the Draft Idaho Transportation Investment Program for Fiscal Years 2027-2033.

As you noted in the Draft ITIP, ITD is addressing reductions in transportation funding from the Idaho Legislature by moving projects into the Unfunded category based on revenue projections. Recent years have included major increases in transportation investment with General Fund (GF) transfers to the Strategic Initiatives Program Fund (SIPF). These funds were only authorized for project delivery and construction, and this allowed ITD to accelerate projects related to capacity and modernization. The Idaho GF transfer to SIPF was not authorized for next year, and it will impact ITD's ITIP. This change over the next seven years totals more than \$1 billion, or about one-third of planned design and construction.

ITD and the Idaho Transportation Board are intentionally investing in the transportation network by focusing first on projects that are critical for ITD to keep the network functioning and in good repair. Many projects with a primary focus on expansion will pause until more funding becomes available for further design or construction. We will advance options to allow the continued planning and preliminary development of capacity projects at least for the next year until more is known.

### **Growth**

Idaho has been one of the fastest-growing states in the nation over the last quarter-century. The 2020 Decennial Census counted 1.84 million Idaho residents, up 17% from 1.57 million in 2010 and 42% above the 2000 count of 1.29 million. Since 2020, Idaho has been growing faster than almost anywhere else in the country. The state crossed the 2 million mark in 2024, gaining 162,000 residents in just four years, which is a 9% jump compared to 3% nationwide and 2% across the West. Between July 2023 and July 2024, roughly 30,000 more people called Idaho home. Idaho's growth story is largely due to migration. Of the 162,000 new residents since 2020, about 142,000, or nearly 9 in 10, moved here from somewhere else, with most coming from other states.

In 2010 the population of Kootenai County was 138,495 which has grown to 194,941 residents based on 2025 population estimates. The Kootenai Metropolitan Planning Organization (KMPO) has analyzed historic growth trends and is projecting the population of Kootenai County to reach

339,542 residents by 2050. The objective of the long-range planning efforts like the Rathdrum Prairie Area Transportation Study is to plan for transportation investments that address this future growth.

### **Defund I-90 Expansion, Projects KN 23349 and 24395**

I-90 is the longest Interstate Highway in the United States and spans 3,100 miles from Seattle, Washington to Boston, Massachusetts. Its function is to provide a high-speed, controlled access arterial to facilitate long-distance travel, regional commerce, and national defense without interruptions.

The Average Annual Daily Traffic (AADT) for the I-90 section between SH-41 and US-95 is currently 61,000 vehicles per day and is projected to double by 2045. These I-90 widening projects address these projected traffic volume increases. This four-mile two lane segment of the interstate comes to a stand still when there are crashes and makes emergency response extremely difficult because there are not enough lanes for traffic to clear the incident. These widening projects also replace aging bridge structures and are designed to meet future capacity needs for their 75-year service life. Contrary to your statement, these projects will deliver meaningful traffic relief for Interstate traffic where volumes are projected to double in 20 years. The two I-90 widening construction projects from SH-41 to US-95 are under contract and began construction in 2025 and will be completed in 2029.

### **Rathdrum Prairie Area Transportation Study (KN 23349)**

The Rathdrum Prairie Area Transportation Study was initiated by ITD and KMPO in 2022 and will be completed by the end of 2026. This study has followed the Planning & Environmental Linkages (PEL) process and has actively engaged the residents of Kootenai County and local communities to develop and screen transportation alternatives for the study area over the last three years. The Study will be completed in 2026 and will serve as a foundation for a future National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) for proposed alternatives to address future growth.

### **US-95 Interchange (KN 24395)**

The US-95 Interchange was constructed in 1960 and is functionally obsolete and does not meet the demands of current or future traffic volumes. The I-90 and US-95 Interchange is the first interchange to advance from the I-90 Corridor Study, with a design focused on expanding capacity, improving safety, and accommodating future traffic growth. Since 2021, several open houses, surveys, meetings with interested parties, and other public involvement opportunities took place as part of the I-90 Corridor Study. The feedback gathered during those efforts has helped shape the proposed design for the I-90, US-95 Interchange project.

ITD held the first open house for this project in March 2025 to showcase the proposed design, visual examples of key sections, and meet with the public to answer questions and gather feedback. The project team updated the proposed design based on feedback from the public to retain better access to Appleway Avenue and presented this revised design at an open house in November 2025. These revisions were aimed at enhancing mobility through the area and allowing better access to local businesses. The existing US-95 interchange does not provide pedestrian access across the interchange, and the proposed US-95 interchange will provide Americans with Disability Act (ADA) compliant facilities.

ITD respectfully disagrees with your assertion that the reconstruction of the US-95 Interchange will not improve overall traffic flow or safety until fundamental deficiencies on US-95 are corrected. The proposed interchange implements several of your recommendations including a grade separation over Appleway Avenue, a critical crossing that does not meet current design

standards for spacing; the US-95 corridor is an access-controlled highway with public road spacing at half mile. In 2016 ITD received a US Department of Transportation FASTLANE grant to remove a traffic signal at Canfield Ave and construct new signals at Wilbur Ave and Miles Ave at half mile spacing to optimize traffic flow. The FASTLANE projects also added turn bay capacity at signalized intersections and constructed median islands to restrict through traffic. District 1 recently completed a US-95 Signal Cabinet Upgrade Project which replaced signal cabinets and controllers that provide adaptive signal technology and uninterrupted backup power supplies,. The US-95 signal cabinets are interconnected with fiber optic cables and can be monitored and managed remotely from D1 Traffic Engineering section.

ITD recognizes that there are opportunities to increase mobility along the US-95 corridor and PEL Alternative development and screening process identified Alternative B, the expansion of US-95 to six lanes that would address congestion on US-95. However, Alternative B is not a stand-alone alternative but was retained as an “Element” to be combined with other alternatives. It didn’t perform well for the whole study area on its own, but it does improve US-95 congestion and helps overall performance when combined with other alternatives.

Many capacity and expansion projects will be moved from a designated program year for construction to what we call “Early Development.” This means that funding is not available for construction. This shift into Early Development retains the project in the ITIP, although unfunded, rather than canceling projects and removing them from the ITIP.

### **KMPO and District 1 Have Not Delivered Modern Solutions**

Beginning in Fall of 2023 the Rathdrum Prairie Area Transportation Study held five public meetings to solicit input from the residents of Kootenai County to identify existing problems, suggest alternative alignments, and potential solutions. Over 50 alternatives were generated by public meeting participants that were evaluated in Level 1 screening. Many of these improvements were identified as future Elements or low-cost improvements that can be made by the respective city, highway districts, or ITD. Many of these Elements included dedicated turn lanes, geometric and intersection improvements.

### **Road Diets / Lane Reconfiguration (Four-to-Three Lane Conversions)**

There are currently no three or four lane arterials within the study area that could implement Road Diets. These types of lane reconfigurations are applicable in heavily developed metropolitan areas to support urban renewal and redevelopment.

### **Access Management / Reduction of ingress and egress points.**

ITD agrees that Access Management plays a critical role in maintaining corridor mobility. Access onto the State Highway System is governed by the Idaho Administrative Procedures Act (IDAPA) 39.03.42 – Rules Governing Highway Right-of-Way Encroachments on State Rights-of-Way. The purpose of these rules is to regulate the access to the State Highway System, so the access matches the intended traffic function designation of each highway and corridor. The rule establishes standards and guidelines for encroachments on state highway rights-of-way; including but not limited to: definitions, safety, maintenance, applications, permits, access spacing, design standards, turnouts, and unauthorized/nonstandard encroachments. Section 400. LOCATION AND DESIGN STANDARD FOR APPROACHES is used by ITD to determine access spacing for signalized road spacing, public road spacing, and approach spacing based on Highway Types; Area Type – Rural, Transitional, Urban; and distance from existing approaches. ITD must comply with IDAPA 39.03.42 standards and guidelines for access control and approach spacing. Freeways and Highways have the highest level of access control where highway access is accessible only at interchanges or locations specified by the Department. Properties adjacent to Freeways and Highways area served by frontage roads.

## **Turn-lane geometry, grade separations, and signal management**

ITD agrees that improving roadway geometry improves mobility. As part of the Alternative Analysis during the PEL process grade separations were evaluated and were not moved forward due to high-cost construction, right-of-way acquisition costs, and impacts to businesses. ITD has implemented advanced signal management along the US-95 corridor with recent signal cabinet upgrades, fiber optic interconnection, advanced radar vehicle detection, and signal timing plans for different periods of the day. Congestion on US-95 during peak hours is because the highway is at capacity.

In regard to your requested actions:

1. It has been noted your request to defund any further expenditures on I-90 lane additions beyond what is contractually unavoidable. As stated earlier, the construction for the I-90/US-95 Interchange has been moved to Unfunded.
2. Your request to terminate 23349 in its current form would be counterproductive. The area Study is almost complete and will provide important information for future planning processes.
3. Key Number 24395 has been moved to Unfunded.
4. As stated earlier, ITD has implemented in 2016 ITD received a US Department of Transportation FASTLANE grant to upgrade signal spacing, removing signals, and installing signals to maintain half mile spacing to optimize traffic flow. The FASTLANE project also added turn bay capacity at signalized intersections and constructed median islands to restrict through traffic. Signal timing was adjusted. A change order was added, and existing turn lanes were also extended. District 1 recently completed a US-95 Signal Cabinet Upgrade Project which replaced signal cabinets and controllers that provide adaptive signal technology and uninterrupted backup power supplies. ITD has maximized the capacity of the existing US-95 corridor and currently are working to maximize the existing SH-53 corridor.
5. ITD project development design goals emphasize safety, mobility, and system performance to minimizing right-of-way needs. Project category costs and construction years are published in the Draft ITIP document:  
[https://apps.itd.idaho.gov/Apps/Fund/itip2027/draft/FY27\\_Draft-ITIP.pdf](https://apps.itd.idaho.gov/Apps/Fund/itip2027/draft/FY27_Draft-ITIP.pdf)
6. Funding for KMPO planning activities is a statutory requirement under 23 U.S. Code § 134 - Metropolitan transportation planning

### **(c)General Requirements.—**

#### **(1)Development of long-range plans and tips.—**

To accomplish the objectives in subsection (a), metropolitan planning organizations designated under subsection (d), in cooperation with the State and public transportation operators, shall develop long-range transportation plans and transportation improvement programs through a performance-driven, outcome-based approach to planning for metropolitan areas of the State.

#### **(2)Contents.—**

The plans and TIPs for each metropolitan area shall provide for the development and integrated management and operation of transportation systems and facilities (including accessible pedestrian walkways, bicycle transportation facilities, and intermodal facilities that support intercity transportation, including intercity buses and intercity bus facilities and commuter vanpool providers) that will function as an intermodal transportation system for the metropolitan planning area and as an integral part of an intermodal transportation system for the State and the United States.

#### **(3)Process of development.—**

The process for developing the plans and TIPs shall provide for consideration of all modes of transportation and shall be continuing, cooperative, and comprehensive to the

degree appropriate, based on the complexity of the transportation problems to be addressed.

Respectfully,

Robert Beachler  
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Comment:

*Dear Members of the Idaho Transportation Department:*

*I write as a long-time observer of Idaho transportation outcomes to urge an immediate course correction. The draft seven-year Idaho Transportation Investment Program (ITIP) places more than \$1.3 billion of highway work into an “unfunded” category. It defers roughly \$1.5 billion more in congestion-mitigation projects (Idaho Statesman, 5 July 2026). That fiscal reality is not primarily the product of insufficient revenue; it is the predictable result of four decades of planning that has treated capacity expansion as the default solution while systematically under-investing in the operational and access-management tools that other states have proven far more cost-effective.*

*As a matter of sound Federal Highway Administration (FHWA) practice and consistent with the performance-based planning requirements under 23 U.S.C. § 150 and related regulations accessible at [highways.dot.gov/laws-regulations](https://highways.dot.gov/laws-regulations), scarce public resources must first be directed to measures that improve safety, mobility, and reliability within the existing right-of-way. Such measures minimize or eliminate the need to acquire additional real property interests by negotiation or, when necessary, by eminent domain. Idaho’s continued prioritization of new lane-miles and major interchange reconstructions before optimizing the existing system unnecessarily escalates both capital cost and the frequency of formal condemnation proceedings.*

### ***The Core Problem Is Not Growth Alone—It Is Outdated Planning***

*Idaho’s population growth is real and substantial. Kootenai County and the Rathdrum Prairie corridor have experienced rapid increases that place measurable demand on the state and local networks. Yet the same pattern of congestion, safety deficiencies, and escalating project costs has been visible for decades. Continuing the same planning paradigm by prioritizing new lane-miles and new roads before fixing the operational deficiencies of the existing system will only reproduce the same overspending and the same unsatisfactory results—and will continue to drive unnecessary property acquisitions.*

*ITD and its regional partners have, in practice, treated modern performance-based and multimodal practices as optional rather than essential. The State Smart Transportation Initiative (SSTI), a joint project of Smart Growth America and the University of Wisconsin–Madison High Road Strategy Center, has for more than a decade convened state DOTs, published the Innovative DOT Handbook containing 34 concrete recommendations, and assisted agencies in Virginia (Smart Scale), Hawaii (SmartTRAC), and elsewhere in shifting from legacy capacity-driven decision rules to outcome-based prioritization. Those agencies have demonstrated that data-driven project selection, multimodal accessibility metrics, and demand-management strategies deliver better mobility and safety results at lower long-term cost while substantially reducing the need for new right-of-way. Idaho’s continued reliance on traditional expansion*

projects, even while maintenance and preservation needs grow, shows that the state has not internalized these lessons.

**Immediate Actions Required: Defund I-90 Expansion, Stop Key Number 23349, and Remove Key Number 24395**

*The I-90 widening between SH-41 and US-95 (adding lanes to create four lanes in each direction) is already under construction. It is projected to cost approximately \$200–210 million for that segment alone, with corridor-level estimates reaching far higher. The project will not deliver meaningful traffic relief relative to the scale of investment when compared with targeted, lower-cost interventions: gradeseparated or improved overpasses at key crossings, continuous right-turn lanes where they currently do not exist, and coordinated signal timing and adaptive signal control across the Rathdrum Prairie arterial network. Adding through capacity on the freeway while the parallel arterials remain fragmented by excessive access points and deficient turn-lane geometry shifts and amplifies the problem. These operational measures can be delivered largely within existing right-of-way and thereby avoid or sharply reduce the need for property acquisition under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (42 U.S.C. § 4601 et seq.) and 23 CFR Part 710.*

*Key Number 23349, US 95, Rathdrum Prairie Area Transportation Study, must be stopped immediately. The study area runs from I-90 north to SH-53 and from the Washington state line east to US-95. Its stated purpose is to evaluate the system and recommend solutions via a Planning and Environmental Linkages (PEL) process under FHWA guidance (23 U.S.C. § 168 and related PEL procedures). In practice, the trajectory of such studies in North Idaho has been to generate additional roadway capacity projects rather than first optimizing the existing network. Continuing the study under current assumptions will lock in more of the same expensive, low-return infrastructure that requires extensive new right-of-way and potential condemnation. Funding and staff effort should be redirected at once to operational improvements and access management on the existing arterials.*

*Key Number 24395, the I-90 / US-95 Interchange (Exit 12) reconstruction from Emma Avenue to Cherry Lane, must likewise be removed from the program in its present form. This project proposes to replace the I-90/US-95 interchange and ramps and to widen US-95 between Emma Avenue and Cherry Lane with associated intersection improvements, at a construction cost on the order of \$128.4 million (unfunded in the current ITIP). The addition of a reconstructed or “new” interchange exit serving US-95 will not improve overall traffic flow or safety until the fundamental deficiencies on US-95 itself are corrected: the provision of above-grade and below-grade overpasses or grade separations at critical crossings, systematic removal or consolidation of mid-block ingress and egress approaches, redesign of the existing right-of-way for improved access control and traffic management (raised medians, restricted turning movements, continuous right-turn lanes), and modern signal management or adaptive control. Until those underlying operational and access-management problems are resolved, the rebuilt interchange will accelerate the delivery of congested traffic onto an already failing arterial. It will recreate the same weave, rear-end, and conflict-point problems that FHWA Corridor Access Management guidance and Interstate access policy (including the requirement under applicable regulations that changes in Interstate access not produce significant adverse impacts on mainline operations or safety) are designed to prevent. **Reconstructing the interchange first is therefore a classic example of capacity addition that fails the test of independent utility and that unnecessarily expands the footprint of property acquisition.***

**KMPO and District 1 Have Not Delivered Modern Solutions**

*The Kootenai Metropolitan Planning Organization (KMPO) and ITD District 1 have supported*

performance-target adoption in form, yet the project pipeline continues to emphasize capacity expansion. The agencies have not prioritized the suite of proven, lower-cost countermeasures that the Federal Highway Administration has documented for decades—corridor access management, dedicated turn lanes, signal coordination, and geometric improvements that remain within existing right-of-way. As a result, Northern Idaho continues to receive planning products that perpetuate the very deficiencies the public is asked to fund and that increase the likelihood of formal condemnation proceedings when negotiated purchases cannot be completed.

### **Referenceable Facts from FHWA and Peer States: Prioritize These Before Any Further Expansion**

**Road Diets / Lane Reconfigurations (four-to-three lane conversions).** FHWA's Road Diet Informational Guide and related safety analyses of 45 sites in Iowa, California, and Washington produced an estimated 29 percent reduction in total crashes (Iowa subset 47 percent; California/Washington subset 19 percent). Operational benefits include separation of left-turning traffic, reduced speed differential, and improved side-street access. When implemented with resurfacing, the incremental cost is minimal, and the work is almost always accomplished within the existing right-of-way, thereby eliminating any need for additional property acquisition or condemnation. These treatments should be evaluated and applied on appropriate arterials throughout the Rathdrum Prairie before any additional through-lane capacity is funded.

**Access management / reduction of ingress and egress points.** FHWA Corridor Access Management guidance documents show that crash rates rise linearly with driveway or commercial approach density. Research synthesized by FHWA shows average speed reductions of approximately 2.5 mph for every additional 10 access points per mile. Closing, consolidating, or converting these approaches to rightin/right-out only, combined with raised medians where appropriate, simultaneously improves safety, reduces delay, and can defer or eliminate the need for costly capacity projects. This is the single highestleverage action available on the existing arterial network and must be funded and executed immediately. In many cases, removal or consolidation of these approaches can be accomplished with minimal or no new right-of-way. To date, Idaho State representatives have taken the incorrect stance on this work and have forced plans, such as the initial SH-41 design, to retain excessive approaches, which have gravely impacted traffic flow and safety. Federal policy and 23 CFR provisions governing control of access on Federal-aid highways support precisely the opposite approach.

**Turn-lane geometry, grade separations, and signal management.** Dedicated right-turn lanes where they currently do not exist, properly designed left-turn lanes, above- and below-grade overpasses or grade-separated crossings at key conflict locations, and modern signal coordination or adaptive control deliver measurable reductions in delay and rear-end crashes at a fraction of the cost of adding through lanes or reconstructing interchanges. These tools should be the first call on available funding. They address the root causes of congestion and crashes on US-95 and the parallel arterials and are prerequisites to any meaningful benefit from a rebuilt I-90/US-95 interchange. Other states that have adopted SSTI-supported practices and FHWA-supported countermeasures have demonstrated that a **"fix-it-first, manage-access, operate-smarter" sequence produces superior mobility and safety outcomes while controlling capital outlays and minimizing the need to exercise the power of eminent domain.** Idaho's continued deviation from that sequence is the principal reason project lists grow faster than available revenue and why property owners face repeated threats of acquisition.

### **Requested Actions**

1. Immediately defund any further expenditures on I-90 lane additions in the Coeur d'Alene / Post Falls corridor beyond what is contractually unavoidable; redirect remaining resources to overpasses, rightturn lanes, access-management treatments, and signal systems that address the actual choke points and that can be delivered within existing right-of-way.
2. Terminate Key Number 23349 (Rathdrum Prairie Area Transportation Study) in its current form. Any

*successor effort must be scoped exclusively around operational improvements, access management, grade separations, and safety countermeasures on the existing network before any new-capacity alternatives are considered.*

*3. Remove Key Number 24395 (I-90/US-95 Interchange reconstruction, Emma Avenue to Cherry Lane) from the ITIP and from active programming until the prerequisite operational and access management deficiencies on US-95—above- and below-grade overpasses, systematic removal of excess ingress and egress approaches, redesign of the existing right-of-way for controlled access and improved traffic management, and modern signal systems—are funded, designed, and substantially complete. A reconstructed interchange that feeds additional volume onto an uncorrected arterial fails both the independent-utility test and the operational-safety criteria applicable to Interstate access changes.*

*4. Direct KMPO and District 1 to adopt, within six months, an explicit prioritization framework that places road diets/lane reconfigurations, access-management projects, grade separations, and signal/turn-lane upgrades above new lane-miles and major interchange reconstructions, consistent with FHWA guidance, 23 U.S.C. performance management principles, and SSTI best practices, and that explicitly prioritizes solutions that minimize or eliminate the need for new property acquisition.*

*5. Report publicly, before the September ITIP adoption, the dollar value of capacity-expansion and interchange projects (including KN 23349 and KN 24395) that can be deferred or canceled by implementing the operational measures listed above, together with an estimate of the reduction in required right-of-way takes and potential condemnation actions.*

*6. Remove funding to the Kootenai Metropolitan Planning Organization (KMPO) until the organization approaches the residents with plans that align to the needs of the community.*

***Continuing to plan and build as Idaho has for the last four decades will only continue to overspend, produce the same deficient results, and force more property owners into negotiation or condemnation proceedings that could have been avoided. The fiscal pressure revealed by the current unfunded list is the moment to change course. I urge you to act.***