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IDAHO TRANSPORTATION DEPARTMENT
600 W. Prairie Ave. • Coeur d'Alene, ID 83815-8764
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Brian Rogers
[REDACTED]
[REDACTED]

September 4, 2026

RE: Response to Rathdrum Prairie PEL Level 3 Response – No Huetter Bypass Group

Dear Brian,

Thank you for your comprehensive letter regarding the Rathdrum Prairie Area Transportation Study. We deeply value the time and effort community members invest in reviewing our planning frameworks. Constructive civic dialogue is essential to ensuring our regional transportation network supports the safety, mobility, and economic vitality of Kootenai County as it continues to experience rapid growth.

We welcome the opportunity to clarify our evaluation process, technical data, and regulatory boundaries as we advance this study.

1. Introduction and Scope

Our goal throughout the Planning and Environmental Linkages (PEL) process has been to maintain an open, transparent, and collaborative environment. To date, the Idaho Transportation Department (ITD) and the Kootenai Metropolitan Planning Organization (KMPO) have hosted multiple distinct rounds of public meetings across both in-person and online platforms.

Our study team has actively engaged with municipal partners, regional airport authorities, transit providers, and local stakeholders through a dedicated Community Working Group (CWG) and stakeholder meeting process. This process directly yielded over 50 public-generated corridor concepts at the project's inception. This multi-tiered screening structure was designed to ensure that diverse community ideas were systematically captured and technically evaluated.

2. Departure from the Original Holistic Design of the PEL Process

In your letter, it brings up preventing the public from demonstrating how combinations of modest improvements – such as east-west arterials upgrades like a 16th street connection could collectively outperform a new alignment. Projects such as the 16th street connection can happen with state or local funds, but each of these “element” projects could happen on their own. Initially there were 50 concepts. To analyze multiple combined alternatives with 50 concepts could be overwhelming and cost prohibitive. It makes sense to narrow the alternatives down before combining scenarios.



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Your letter further states that “these materials still withhold the quantitative cost ranges, detailed right-of-way parcel data, origin-destination matrices, and engineering assumptions necessary for the public to determine whether the proposals are valid, cost-effective, or superior to alternatives that were never allowed to be evaluated in combination.” The *Level 3 Alternatives Screening Results for Public Review and Input* document presented at the July 2026 public meeting are available on the project website at <https://itd.idaho.gov/wp-content/uploads/2026/07/RathdrumPrairie-PIM5-Magazine-23349.pdf> includes these measures for Alternatives D, H, M and N. Specifically, the tables on pages 16–17 identify the total number of potentially affected right-of-way parcels, potentially acquired right-of-way acreage, potentially acquired agricultural acreage, residential and commercial displacements, and conceptual costs, among other evaluation measures. Pages 28 & 29 identify the same for Element B, Alternative N+D, N+H, N+D+B, and N+H+B. The *Level 3 Screening Matrix & Traffic Analysis* handout that was shared at the public meeting and can also be found online at <https://itd.idaho.gov/wp-content/uploads/2026/07/Rathdrum-Level3-Screening-Matrix-Traffic-Analysis-23349.pdf> compares the origin-destination matrices and the engineering assumptions. As we go further into the NEPA process, there will be additional information for even further evaluation. This is part of the process.

3. Traffic Reality: US-95 as the Dominant Constraint

Our origin-and-destination modeling confirms that US-95 experiences complex travel demands, carrying a significant volume of both short-distance local trips and regional through-traffic. To optimize safety and long-term capacity, converting US-95 into a fully access-controlled highway with localized interchanges was thoroughly considered during Level 1 screening. However, because the corridor is already highly developed, the right-of-way acquisition and structural modifications required to construct safe interchange spacing present overwhelming implementation and financial barriers. As a result, standalone full-access control on the existing US-95 alignment was determined to be unfeasible. See Level 1 Concept ID #5 on page 5, Concept ID #6 on page 6, and Concept ID #11 on page 7 at <https://itd.idaho.gov/wp-content/uploads/2025/05/23349-S-20240928-Final-Public-Meeting-2-Summary.pdf>.

4. ITD’s Stated Preference for Larger, Higher-Speed Facilities and the Case for Alternatives B and N

Larger roads with the higher speeds are the ones coincidentally that would most likely need Federal Aid funds which would then need to have the NEPA review. Smaller, local street projects not funded with Federal Aid, would likely not need NEPA reviews. Many of the smaller projects that would be expected to be funded as local projects were listed as “Elements” that would be expected to be funded separately. They “do not fully meet Purpose and Need as a stand-alone alternative, but may be evaluated as a packaged element of a larger-scale alternative or implementation plan.” They wouldn’t meet the Purpose and Need by themselves but could be combined with a larger project. Ultimately, facility function and funding/implementation responsibility differ between regional alternatives and local elements. Keep in mind, that widening US-95 to 6 lanes as portrayed in Element B can be a construction project completed on its own as a standard construction project with what would be expected to be a categorical exclusion for an environmental document. It just doesn’t address the purpose and need of our Rathdrum Prairie Area Transportation



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Study addressing the Rathdrum Prairie area. Improvements to US95 tends to impact only the US95 area and not the area as a whole as the other alternatives do.

5. Critique of Alternative H

Regarding the critique of Alternative H, balancing access control with property owner rights is a core engineering requirement. An access-controlled mainline cannot maintain direct driveway connections without severely degrading safety and trip reliability. Frontage roads represent standard engineering practice to safely cumulate local property access, isolating lower-speed turning maneuvers from high-speed, high-volume regional traffic. ITD has worked hand-in-hand with municipal staff and community working groups to consider how these parallel local networks align with local land-use planning.

6. Potential Violation of Federal Standards

To clarify the technical and federal frameworks guiding our designs:

- **Interchange Spacing:** Per Federal Highway Administration (FHWA) standards for urbanizing areas, the minimum benchmark for interchange spacing is 1 mile. The current concept preserves roughly 2 miles of separation from Huetter Road west to the State Highway 41 (SH-41) interchange, and 2 miles east to the Northwest Boulevard interchange, successfully meeting federal safety criteria.
- **Huetter Truck Parking Area:** Rather than introducing closely spaced exits that degrade mainline safety, any necessary commercial vehicle access will be integrated directly into the broader design of the Huetter Interchange.
- **Independent Utility:** Frontage roads do not invalidate independent utility; rather, they ensure that individual phases of the mainline can operate safely and connect logically to the existing local grid during multi-year, phased funding cycles.

7. SH-41 Access-Control History and Failures of State Legislative Oversight

The Rathdrum Prairie PEL Study was not involved in the planning, design, construction, or access-control decisions associated with the existing SH-41 corridor. Those historical decisions are outside the scope and authority of this study. Accordingly, the PEL does not evaluate or revisit the decisions that resulted in the current configuration of SH-41.

The PEL instead evaluates the existing transportation system, including current conditions and access along SH-41, and considers how the facility can best function as part of the future transportation network under the alternatives evaluated in the study. Access management and the relationship between regional facilities and the surrounding local roadway network are considered as part of that evaluation.



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8. Fifth Amendment Considerations and the Absence of Demonstrated Need

Your letter cites federal real estate regulations (23 CFR 710.105 and 710.511); however, these sections govern administrative real property acquisition and federal reimbursement procedures rather than establishing a statutory mandate to prioritize existing corridor expansions over new construction. The evaluation of existing vs. new corridors is driven entirely by data. Our transportation demand modeling conclusively demonstrates that an expansion-only approach on existing routes yields unacceptable, failing levels of congestion for the region's future. Low-impact options have not been summarily eliminated; local upgrades like the 16th Street project remain fully active as supportive elements within our broader long-term strategy.

9. Insufficiency of Detail Provided for Public Review

The magazines provided narratives, typical sections, maps, an Impact Summary (including ROW impacts, displacements, and conceptual costs), and a Performance Summary showing increases and decreases to crashes in certain areas for both the individual alternatives and combined alternatives (including B, which is shown on page 28 in the Level 3 magazine). The numerical thresholds for Best, Better/Good, Neutral/Medium, Negative and Worst are published in the Alternatives Evaluation Process Memo. A copy was available at each of the public meetings and can be found at this link online: <https://itd.idaho.gov/wp-content/uploads/2025/05/23349-M-20250731-Rathdrum->

10. Level 3 Results, Cost Inflation, and Process Deficiencies

Your letter states that conceptual cost estimates and right-of-way acreage remained incompletely quantified in public-facing materials released through July 2026. The *Level 3 Alternatives Screening Results for Public Review and Input* document presented at the July 2026 public meeting and available on the project website includes these measures for Alternatives D, H, M and N. Specifically, the tables on pages 16–17 identify the total number of potentially affected right-of-way parcels, potentially acquired right-of-way acreage, potentially acquired agricultural acreage, residential and commercial displacements, and conceptual costs, among other evaluation measures.

These figures represent the Level 3 screening results and are appropriately characterized as conceptual at this stage of the planning process. More detailed estimates and property-specific impacts would be developed during subsequent project development and environmental review if a particular alternative advances.

11. Prospective Changes in Mass Transit, Trucking, and Vehicle Technology

The PEL study recognizes that transportation conditions and technologies will continue to evolve over the planning horizon, including changes in vehicle technology, freight operations, transit, and travel behavior.



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These factors are considered within the study's future-year transportation analysis and do not, by themselves, dictate selection of a particular alternative.

The characterization of an alternative as higher- or lower-impact is based on the study's overall evaluation of the applicable performance measures rather than on any single metric. The Level 3 *Alternatives Screening Results for Public Review and Input* document provides the underlying comparison of right-of-way impacts, potential displacements, conceptual costs, and other measures for Alternatives B, D, H, M and N. The study's results should therefore be considered in their entirety rather than based on an individual measure.

12. Conclusion

Thank you for taking the time to provide your comments and questions regarding the Rathdrum Prairie PEL Study. We appreciate your continued engagement with the study and have provided the information above to address the concerns raised in your letter.

Additional project information and supporting documentation will continue to be made available through the project website. For requests for specific records, technical documentation, correspondence, or other information not contained in the publicly available project materials, please use ITD's public records request process. That process provides the appropriate mechanism for obtaining specific records and information associated with the study and its development.

Sincerely,

CarrieAnn M. Hewitt, P.E.

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Mon.-Fri. 8:00am-4:30pm (PT)

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