



Jackson Hole Conservation Alliance

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March 3, 2009

Timothy Stark, PE
Environmental Services
Wyoming Department of Transportation
5300 Bishop Boulevard
Cheyenne, WY 82009-3340

cc: Hobackcomments@dot.state.wy.us

Dear Mr. Stark,

The Jackson Hole Conservation Alliance (Conservation Alliance) has been a member of the ID team for the Wyoming Department of Transportation and Federal Highway Administration environmental impact statement for U.S. Highway 26/89 and U.S. Highway 189/191 south and north of Hoback Junction since the inception of this study. We take this opportunity to reiterate our concerns and suggestions for the Draft Environmental Impact Statement (DEIS) on this highway from Hoback Junction north to MP 148.6.

The purpose of this project is to resolve existing roadway deficiencies while safely and efficiently accommodating current and future traffic volumes and improving system linkage. The assumptions made are:

- the current highway is inadequate for the volume of traffic currently utilizing this road and will see greater volumes in the near future,
- the inconsistent width of the road and appearance are difficult for drivers to respond to leading to unsafe speeds and operations,
- the road needs to maintain consistency with land use planning,
- the current system lacks alternative transportation modes for bicycles and pedestrians,
- the road deficiencies:
 - inadequate shoulder width,
 - inadequate clear recovery area width,
 - steep roadway grades,
 - numerous local access points,
 - inadequate passing and turning lanes,
 - substandard roadway alignment,
 - deficient pavement,
 - deficient bridges and culverts

are negatively impacting the safety of drivers, resulting in an above state average crash rate.

The Conservation Alliance believes that the proposed five-lane rural highway or the combination alternative are excessive “solutions” for these problems and will have considerable negative impacts on our wildlife and community character. The DEIS uses assumptions throughout that are not supported by any documentation. The road width of these proposals goes beyond the alternatives necessary to solve the above needs, is based upon faulty growth and development projections, and exacerbates the potential for increased wildlife/vehicle collisions. We believe that a single lane north bound and south bound with a center left turn lane and right turn pullouts at each access point, with underpasses or overpasses for wildlife, will satisfy the purpose and need for this proposal, and are more consistent with the community’s character and desire to hold wildlife as our greatest value in the region. Unfortunately, this alternative was dismissed at the secondary screening step of the DEIS process.

The first claim for this decision is that the Level of Service would decline to a D in 2026. This decline was identified as a 15 second increase in follow time for vehicles during a 10-minute travel time. This put the LOS right at the break between level C (acceptable) and level D (unacceptable) and was considered “an inability to accommodate growing travel demand.” Other reasons stated that this alternative would not meet the turning needs of drivers nor would it reduce crash numbers. Neither of those claims are substantiated by this document nor supporting scientific information. A 3-lane road would provide a center left turn lane and right turns would be accommodated by pullout lanes at each access point rather than a continuous far right lane. The number of crashes would easily be reduced by removing slower, turning vehicles from the main traffic flow. In addition, animals would find it easier to negotiate a 3-lane road rather than a 5-lane road and would decrease the number of wildlife/vehicle collisions, which account for almost half of the crashes on this stretch of road.

The DEIS repeatedly and throughout the document alludes to

- “substantial growth within the area”,
- “would not accommodate growing travel demand”,
- “greater amounts of residential development occurring in the county than in the town over the next 20 years”,
- “from 1990 to 2000, Teton County grew approximately 63 percent and Jackson grew approximately 93 percent. These trends are expected to continue in the future”,
- “(Bondurant) will experience considerable growth by 2020”,
- “Trends are moving southward with decreased residential density”,
- “Traffic volumes increased 179% between 1985 and 2006” and infers that increase will continue at that rate.

The Conservation Alliance believes that using these assumptions on future growth and densities is an inappropriate means to justify a 5-lane highway rather than a 3-lane. These comments are inconsistent with the current findings in the Comprehensive Plan revision and illustrate the problem of basing any development assumptions on a plan that is undergoing critical updating. Teton County is in the middle of revising its local land use goals and objectives. Importantly, these future objectives may drastically shift the trends of development patterns and intensities that appear to be the basis of evaluating the capacity of various alternatives to meet the purpose and need of the project. Specifically, key attributing factors to travel demand, such as the amount of development proposed in rural areas and the amount of permitted commercial development in

the Town of Jackson and Teton County, are likely to shift. Generally, these assumptions are also clearly at odds with the current nationwide economic downturn with little chance of full recovery in the near future. Both of these factors can easily modify or reverse any recent patterns of growth and development in Teton County and neighboring counties.

In surveys conducted in conjunction with our community's current comprehensive plan update process, residents of Teton County have recently reconfirmed the primary value of wildlife to our community. Above and beyond all other elements in Jackson Hole we stressed the need to protect our wildlife and its habitat. The DEIS states that land adjacent to the roadway is private, but within a half mile the land is publicly owned and "important habitat for elk, mule deer, bald eagles, and other wildlife species native to the area." A 5-lane highway through elk and mule deer habitat does not meet the standards that our community envisions to protect our natural resources, including our unique scenic vistas and landscapes. In any alternative chosen, the impact on habitat fragmentation and the reduction in habitat connectivity must be adequately addressed. The DEIS mentions awaiting Wyoming Game and Fish suggestions before determining the feasibility of mitigation for wildlife crossing on this 7 mile stretch of road. There are also statements that describe the possibility of using game crossings underneath two bridges that will be replaced in this project and the need for elk proof fencing to direct animals to those crossings. Numbers for the years 1995-2004 show 202 documented crashes with 2 fatalities. Of those crashes 93 involved animals. The remaining crashes are related to road deficiencies that can be eliminated with a 3-lane alternative as easily as the proposed 5-lane proposed. The claim that the 2001-2004 crash rate for this section of road is 1.64 per million vehicle miles (MVM) and exceeds the state average of 1.28 MVM must take the high number of animal collisions into account. **If road improvements are intended to provide safer conditions for drivers, then analysis of specific measures in each alternative to decrease collisions with wildlife needs to be done now, not put off to the design phase.**

The wildlife, scenic resources and rural nature of Jackson Hole are the basis of our economy and our community character. Our Comprehensive Plan states that future mobility must meet the needs of residents and tourists within the context of community character. We suggest that a 5-lane "rural" highway does not meet those values. The Conservation Alliance requests that a 3-lane road, one lane each north and south bound with a center turn lane, and discontinuous right turn lanes at access points, with under or overpasses for wildlife, and accompanying speed reductions, will be most in line with our needs and community wishes.

Thank you for your consideration.

Sincerely,

Franz Camenzind
Executive Director

Louise Lasley
Public Lands Director