

7/14/10

Sean O'Malley, Teton County Engineer
Paula Stevens, Associate Planning Director, Teton County
CC: Teton Board of County Commissioners, Jackson Town Council
Re: Purpose and Need Statement for the Northern South Park Area
Submitted via email

Dear Sean and Paula,

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to submit comments regarding the *Northern South Park Planning and Environmental Linkage Study - Purpose and Need Statement* draft, released in June 2010. These comments will deal largely with this draft document, and are not exhaustive as to the proposed study in its entirety.

During the past several years, the Conservation Alliance has worked closely with neighbor groups in the area, many of which have significant concerns about the proposed connector route. We share many of their key concerns, particularly regarding the numbers that were used in the traffic projections and the potential impacts on High School Road, neighborhood quality of life, scenic resources and wildlife resources. Additionally, the Alliance is supportive of the position that fixing the "Y" intersection should be the first priority over new road construction.

Specifically, we have major concerns with the manner in which the county has pursued and undertaken the study. *The key underlying assumption that affects the entire study is the figure for future growth in the area.* The numbers used in the Need and Purpose Statement draft are well above both those that the joint planning commissions have developed during their public review of the draft Comp Plan specifically for South Park and what is allowed under our current Comp Plan for the area. Also, because the elected officials have not yet seen the draft Comp Plan, this future amount of growth has not actually been determined; running different scenarios for development would have been more reasonable, realistic and ultimately more useful than running the study based on one scenario - the average between the base regulations and the high end of the April 2009 draft (which put 1500 units in the north end of South Park alone). Modeling can only be as accurate as the assumptions on which it is based, and specific recommendations for traffic improvements should be based on our upcoming new Comp Plan and adopted community vision.

Additionally, improvements to the "Y" intersection that may relieve traffic congestion there should be explored prior to planning piecemeal changes to surrounding areas (Tribal Trails) that very well may have unintended negative consequences on surrounding local roads and land uses. Increased traffic on High School Road and the attendant safety concerns, as well as the fact that the streets the connector will link to are not designed to carry other than local neighborhood traffic, for example, are primary concerns. The use of the proposed Tribal Trails Road for local traffic is an entirely different thing than the use of the road as a connector. In the Purpose and Need statement, this distinction should be clarified.

Lastly, building the Tribal Trails Road as a regional connector will not achieve the primary purpose of the project, as outlined in the draft Purpose and Need study. The character of the existing neighborhoods will simply not be preserved if a connector road is constructed. And, as described above, both the first and second purposes should be amended to reflect more accurate population projections for the area (or at least a range of projections), as well as a clearer understanding of the levels of local vs. regional trips to be accommodated on the proposed road.

Overall, even though this road may have been a good idea when the easement was established, it does not necessarily mean that it is still a good idea. As valuable new information continues to be brought to the table, new recommended improvements must be based on the community's specific vision for the area. Long range planning with a larger picture view will continue to be vitally important for Teton County as we move towards adopting a new Comprehensive Plan and community-wide transportation strategy.

Thank you for your consideration of these comments.

Sincerely,



Kristy Bruner
Community Planning Director



Becky Tillson
Community Planning Associate