

May 27, 2015

Dear Board of County Commissioners, Mayor Flitner, and Town Councilors,

Thank you for this opportunity to comment on the public review draft of the Integrated Transportation Plan (ITP).

The Alliance believes we have a responsibility to align our transportation decisions with our community's vision of people having the freedom to safely and conveniently get where they need to go on foot, bike, or transit, while not expanding the highways that divide our community. This means we should focus on providing people with transportation choices and deal with our traffic congestion through investments in public transportation, bicycling, and walking.

While this public review draft takes steps in the right direction toward advancing our community's vision of a better transportation future, with a few improvements it could more effectively advance the vision and goals of the 2012 Jackson / Teton County comprehensive plan. Our comments focus on how to make this draft even stronger, especially in regards to wildlife protection and the approach to initiating the development of major capital projects.

**Plan Overview:** While the Alliance appreciates the overall program direction and primary outcomes in the draft ITP, especially the doubling of transit ridership by 2024 (and again by 2035) and the 5% shift from single occupancy vehicle (SOV) trips to walking, bicycling, and transit by 2035, we believe **we should set more ambitious goals in order to align with the comprehensive plan** and our community's vision of a better transportation future.

First, it's disappointing this draft does not set more aggressive vehicle miles traveled (VMT) reduction goals. As explained on page 26 in the "Forecasting Traffic and Trends" section, "total vehicle miles of travel in Wyoming is currently in decline," mirroring the "long-term, nationwide drop in per capita miles of travel." Furthermore, "Most analysts expect per capita VMT to continue to decline, gradually but steadily. This means that traffic in Wyoming and in Jackson Hole will grow only in those years when population and tourism grow faster than per capita VMT declines."

Given this driving trend, and our comprehensive plan goal to meet "future transportation demand through the use of alternative modes," **the ITP should strive for a scenario that achieves 0% growth in VMT from 2013 to 2035.** While we recognize this may prove challenging and require more ambitious program direction and primary outcomes, given the underlying VMT trends and the vision of our community, it should serve as our overarching goal.

At a minimum, the ITP should follow the direction of comprehensive plan Policy 7.1.a and "evaluate the long-term costs and benefits of various transportation strategies and provide a detailed transportation implementation program," so that we can have an honest conversation about what investments and policy choices we would need to achieve the vision and goals in the comprehensive plan.

In addition, as protecting wildlife is a core value of our community and over 200 animals are

struck and killed by people driving cars on County roads every year, it's appropriate and appreciated that this draft contains a "Wildlife Protection" section in the Major Capital Projects chapter and an indicator measuring annual wildlife-vehicle collisions on the transportation indicator dashboard. While these are important steps in the right direction, **the ITP should also include stronger policy level direction for wildlife protection** (per our detailed suggestion below) starting with the inclusion of a **goal to reduce wildlife-vehicle collisions by 90% by 2035** in the "Plan Scenario Policy Direction" on page 6.

**Transit Development: The Alliance supports the overall direction and level of detail in the strategic transit plan as detailed in the draft ITP**, especially the concept of implementing bus rapid transit (BRT) between the Town of Jackson and Teton Village. We are encouraged by the language calling for direct collaboration between Grand Teton National Park and Southern Teton Area Rapid Transit (START) regarding the Park transit pilot project concept to ensure this service meets the needs of the Park. This chapter **should also include a deeper examination of what transit investments it would take to achieve 0% growth in VMT from 2013 to 2035**.

**Active Transportation:** The Alliance supports the focus and emphasis on bicycling, walking, and pathways improvements given their cost-effectiveness at helping our community achieve our vision of a better transportation future. Upgrading the Snow King – Maple Way corridor, implementing the Community Streets plan in Town, and moving forward with a similar plan in the County will provide significant benefits to our community (please see our comment letter submitted May 14, 2015 for specific recommendations regarding the public review draft of the Community Streets Plan).

In order to ensure bicycling, walking, and pathways improvements align with our community value of protecting wildlife, **the ITP should call for an analysis and accompanying mitigation of wildlife-impacts from bicycling, walking, and pathways improvements**, similar to how we plan for road improvements to ensure they protect wildlife and our families and increase habitat connectivity.

**Transportation Demand Management:** The Alliance supports the implementation of a transportation demand management (TDM) program as detailed in the draft ITP, especially the implementation of an annual performance monitoring and reporting system to track trends and evaluate the ongoing effectiveness of implementing the ITP. We encourage strong consideration in the immediate future of both car share and bike share programs as they offer cost-effective TDM measures.

While the Alliance supports the hiring of a TDM coordinator to advance this element of the ITP, **the County and Town would be better served hiring an ITP Coordinator to advance the overall goals of the ITP** through long-term strategic transportation planning, supporting the coordination of project implementation and oversight, and the identification of funding necessary to advance the vision and projects in the ITP.

It's curious that this draft ignored policy direction from comprehensive plan Policy 7.1.d: "Discourage use of single occupancy motor vehicles." Specifically, this policy calls for the ITP to explore, "strategies, such as managed parking in areas served by alternate modes and other incentives and disincentives [that] can also discourage SOV travel." Therefore, we recommend

the ITP explore such strategies.

**Major Capital Projects:** The Alliance appreciates the draft ITP calling for investments “guided by system preservation and efficiency needs,” and placing “low priority on expansion of road and street motor vehicle capacity.” Though encouraged by this rhetoric, we have two major concerns regarding the major capital projects of the draft ITP.

First, this section emphasizes the construction of new roads and the expansion of existing roads, while neglecting capital projects related to transit, bicycling, or walking.

Second, the approach to initiating the development of major capital projects is based on traffic counts. We recommend a shift away from an approach that uses traffic count benchmarks toward an approach that aligns with our community’s values and vision of a better future, as articulated in the comprehensive plan.

The capital projects detailed in the draft ITP focus on the construction of new roads and the expansion of existing highways, all of which would likely serve to increase SOV traffic. For each new capital project, **the ITP should explain how the implementation of each project aligns with our comprehensive plan guiding principle to “meet future demand through alternative modes.”** If new roads or new lanes on existing roads do not help us meet demand through alternative modes, then those projects should be re-designed in ways that help achieve this goal.

Furthermore, the approach to initiating the development of major capital projects in the draft ITP assumes that wider roads will alleviate congestion, despite **decades of data and empirical evidence<sup>1</sup> from across America proving that wider roads only encourage people to drive more, harm community character, and do not reduce congestion.** In addition, using a benchmarking approach based on current and forecasted traffic counts to determine project timing does not align with our comprehensive plan goals of meeting “future transportation demand through the use of alternative modes” and creating “a safe, efficient, interconnected, multi-modal transportation network.”

Recognizing the realities of how the WY Department of Transportation operates and funds its projects, we **encourage an approach to prioritizing capital projects that aligns with the vision and goals of the comprehensive plan and our community’s values and vision of a better future.** Such an approach would not use traffic counts as a guide, but instead prioritize investments in this manner:

- First – transit, bicycling, and walking;
- Then, service and freight vehicles, along with taxis;
- Then, multi-occupancy vehicles; and finally
- With the lowest priority, investments that encourage the use of single occupancy vehicles.

This approach would align with both our community’s values and the empirical evidence regarding the fact that, “much of the County’s traffic growth has resulted from short trips within Jackson and other settled places. Many of these shorter trips could be made by walking and bicycling, freeing up street capacity for traffic flow, especially in Town and in rural villages and neighborhoods” (page 16).

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Despite concerns with the overall approach to initiating the development of capital projects, the Alliance supports:

- The emphasis on wildlife permeability on WY-22 and WY-390,
- The concept of grouping projects to take advantage of geographic and other synergies,
- Exploring the potential of dedicating new lane capacity to an exclusive bus/HOV (high occupancy vehicle) lane for part or all of WY-22 Multi-Lane, Multimodal Improvements, Jackson – WY-390,
- The completion of the WY-22 pathway (assuming concerns regarding wildlife impacts are addressed accordingly),
- The low priority given to both improvements of Spring Gulch Rd. and consideration of a new north bridge, as neither appears to have system-wide benefits and both could have negative impacts on fish and wildlife habitat and our community character, and
- The proposed project development process including a coordinated design process, public involvement, and multi-modal design.

To improve the alignment with major capital projects and our community's vision, the ITP should:

- Ensure the multi-modal reconstruction of the Y intersection fully accommodates the needs of all modes and considers all available tools for accomplishing this goal, like a roundabout, and
- De-prioritize the construction of new roads and focus on prioritizing investments in public transportation, bicycling, and walking, along with strategic improvements to existing assets, before considering the construction of new auto-centric infrastructure.

**Wildlife Protection:** While including a section on wildlife protection is a step in the right direction and is in alignment with our community's highest value – protecting wildlife – this section needs significant improvement. Beyond the actions detailed in the draft ITP, the ITP should specifically reference the soon-to-be-under-development "County and Town Wildlife Crossings Master Plan" and call for:

**"A wildlife-vehicle collision reduction master plan** that includes a systematic, county-wide, science-based analyses of site-based mitigation options that **will be completed and integrated into Town and County ITP and transportation projects**. The Town and County shall work with WYDOT, Wyoming Game and Fish Department, federal agencies, and local wildlife experts to identify, develop and fund wildlife-vehicle collision mitigation options on state, town, and county roads. Both the county roads and town streets programs will incorporate facility design measures to provide for wildlife permeability and promote improved wildlife-vehicle safety."

**Regional Transportation Planning Organization:** The Alliance supports the establishment of a Regional Transportation Planning Organization (RTPO), and encourages further discussion regarding the details of its organizational structure, responsibilities, and role in the allocation of funds. As articulated in the draft ITP, an RTPO would have significant benefits for transportation planning in our community.

As establishing an RTPO is likely a long-term endeavor, **the County and Town should move forward with the development of an Integrated Transportation Department that**

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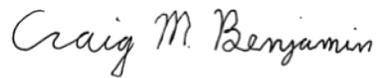
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**can coordinate the implementation of the ITP in the short-term.** In addition, it is not necessary to have a fully structured and operational RTPO before approving a dedicated funding source for transportation investments, as the adopted ITP will identify needed investments for implementation.

**Action Plan:** The Alliance appreciates the details of the proposed action plan and the analysis of potential funding options to implement the ITP. In order to improve the proposed action plan, it should:

- Focus on and prioritize investments in public transportation, bicycling, and walking, along with strategic improvements to existing assets, before considering the construction of new auto-centric infrastructure,
- Call for the adoption and implementation of a wildlife-vehicle collision reduction master plan and an update to the pathways master plan, and
- Accelerate the adoption of a dedicated funding source for transportation improvements, while recognizing the need to combine the revenue generated through this funding source with other community needs (like a 1-cent sales tax increase that funds transportation improvements, housing affordable to people who work here, and permanently protecting open space and wildlife habitat).

Thank you again for the opportunity to comment on the public review draft of the ITP, and please let us know if we can be of any assistance as you move forward with improving this plan.



Craig M. Benjamin  
Executive Director  
Jackson Hole Conservation Alliance

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<sup>1</sup> <http://www.vox.com/2014/10/23/6994159/traffic-roads-induced-demand>