

December 1, 2020
Jackson Town Council
Teton County Board of County Commissioners



RE: Comments on the ITP Update Redline

Dear Chair Macker, Mayor Muldoon, Commissioners, and Councilors,

The Integrated Transportation Plan (ITP) Update has reinvigorated discussion on the realities of induced demand, the possibilities of transit, and the need to jumpstart implementation. Yet the ITP draft on your desk does not honor the Comprehensive Plan vision. We suggest improvements in four areas: **vision, indicators and benchmarks, the project charter process, and the list of prioritized actions;** and we request a **commitment to innovation.**

Vision

The ITP's new vision is that "travel by walk, bike, carpool, or transit will be more convenient than travel by single-occupancy vehicle." This would be strengthened by a commitment to "not build new roads or new lanes until after we fully identify and implement transit/walk/bike strategies and can measure their success."

Indicators and benchmarks

The indicators do not track walking and biking, even though they are the modes of transportation most aligned with the core tenet of our Comp Plan to preserve our ecosystem. For example, the proposed time differential indicator will track competitiveness between buses and cars, but not e-bikes (even though their use is exploding). Please add indicators that track carbon-free transportation, such as pathway users counts, that could use "creative" techniques (e.g., big data).

As for benchmarks, although we decided to embrace the much-improved metric of Vehicle Miles Traveled (VMT), *in practice we have not*. Capital project initiation is based on traffic counts, with the intent to keep us ahead of WYDOT. Yet we are still locked into Level of Service (LOS) since that standard guides WYDOT's decision-making. This could lead to building infrastructure we don't need (if we ever will). Instead, let's list getting WYDOT to embrace VMT as a priority action – just as the update proposes legislation to allow transit lanes. Or, let's add a VMT benchmark, and retain the traffic count if only so we can proactively tell WYDOT to postpone a project.

Similarly, benchmarking still relies on peak season counts. That is akin to building a house for the biggest party we ever throw, leading to excess capacity (and thus demand) when we're not hosting said party. How does that support "community first, resort second?" We already know that unmet demand in summer is shifting to active transportation: a shift this plan is supposed to motivate, not undermine. Please base benchmarks on annual counts so that we're serving the community that lives here and

Protecting the wildlife, wild places, and community character of Jackson Hole.

685 S. Cache St. • P.O. Box 2728 • Jackson, WY 83001 • (307) 733-9417 • info@jhalliance.org • JHAlliance.org

not building excess infrastructure that encourages additional driving.

Project charter process

The charter process requires inadequate project objectives and does not identify how alternatives are evaluated. Required project objectives include safety, environmental protection, and cost effectiveness (as it relates to evaluating a cheaper alternative) but does not consider the return on investment or a valuation of community benefit. Neither are those included as a criterion for evaluation, since no criteria are listed. A cost-benefit analysis or similar tool could help determine for every dollar spent on building a road, what money is saved in transit efficiency or lost to ongoing maintenance costs? If we invest in a new bike lane, what funds are saved due to improved public health or gained in increased bicycling tourism? Our community has no way to determine if projects are an impactful investment that achieve our vision; please add “positive cost-benefit analysis” to the list of minimum project objectives.

List of prioritized actions

Though we fully support the hiring of ITP staff, it is unclear how action steps were prioritized. Were they ranked based on the need for long planning lead times, for their ability to get us closer to our vision (i.e. impact compared to their investment), or ease of implementation? Improvements for walking and biking are at the bottom of the priority list, if they are included at all. Please clarify how projects were prioritized and include new priorities that we’ve referenced, such as getting WYDOT to move away from LOS and improving walking and biking.

Commitment to innovation

Although both the Council and Commission discussed the need to experiment and not to let the question of “who else has done this?” kill innovation, we find little in the ITP reflects the desire to move away from the cars-first paradigm. The ITP emphasizes road-building projects with no justification while it pays scant, if any, attention to snow sheds, fare-free transit, tunnels, pedestrian zones, paid parking, slow lanes, rail, etc. Consideration of shoulder-running transit on Hwy 22 was removed without reason, and no capital projects that primarily benefit pedestrians or cyclists are even contemplated. Instead, the plan glorifies buses and new roads. Please strike needless roads (the North Bridge, Spring Gulch improvements, and the Tribal Trail Connector), add in shoulder-running transit for Hwy 22, and formally commit to innovation.

Thank you for your work toward a better transportation future, and we hope that you go farther to challenge the “cars above all else” mentality that devastates our quality of life and climate.

Sincerely,



Brooke Sausser

Protecting the wildlife, wild places, and community character of Jackson Hole.

685 S. Cache St. • P.O. Box 2728 • Jackson, WY 83001 • (307) 733-9417 • info@jhalliance.org • JHAlliance.org