

November 3, 2010

Mr. Lee Potter
Federal Highway Administration
2617 E. Lincoln Way, Suite D
Cheyenne, Wyoming 82001-5662

Re: Jackson South Highway 89 Final Environmental Impact Statement

Dear Mr. Potter,

The Jackson Hole Conservation Alliance (Conservation Alliance), on behalf of our 2,000 members, has reviewed the Jackson South Final Environmental Impact Statement (FEIS) and submits these comments for your consideration. We appreciate the opportunity we had to work on the ID team and our comments here reflect previous discussions and concerns we have addressed elsewhere and in our comments of March 3, 2010, for the draft of this environmental impact statement.

Jackson South (U.S. Highway 26/89 and 189/191) is a major entry into the valley, carrying both visitors and residents commuting from areas beyond Jackson Hole. The existing two-lane is inadequate and unsafe and needs to be upgraded. The Conservation Alliance does not believe that the changes needed require a five-lane highway to assure driver safety and increased level of service. We continue to advocate for a single lane north bound and south bound with a center left turn lane and right turn pullouts at each access point, with underpasses and overpasses for wildlife. This will satisfy the purpose and need for this proposal – human safety and level of service – and is more consistent with the community's character and desire to maintain wildlife corridors and provide a rural experience for those living and traveling to this world-renowned park gateway community.

While most of the safety issues identified might be resolved, as stated in the EIS, by correcting the deficiencies with any width reconstruction, the greater the width, the more difficult it will be for wildlife to safely maneuver across the road. This section of highway is frequently crossed by wildlife. A five-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. Statistics for the years 1995-2004 show 202 documented crashes with two fatalities. Of those crashes, 93 involved animals. The remaining crashes are related to road deficiencies that can be eliminated with a three-lane alternative as easily as the proposed five-lane. There is a critical need to address these deficiencies and specifically to provide the best possible mitigations for wildlife.

We would strongly recommend that Wyoming Department of Transportation (WYDOT) build a more reasonable, smaller road width and spare no expense in placing appropriate and effective wildlife mitigation measures, whether underpasses, overpasses or other systems, on this section of highway. Jackson Hole is unique in its diversity and abundance of wildlife, and the community recognizes the value of maintaining these

resources. Wyoming is recognized around the world for our wildlife and scenic and natural wonders, and deserves nothing less than world-class solutions for our roadways. Jackson Hole is a tourist destination and that fact should inform design of both the highway and structures built to provide wildlife movement across these barriers. When people enter the valley south of Jackson, they have arrived at their destination; they are not moving through, but here to appreciate the views, community character, public lands and, especially, the wildlife. This factor should be foremost in everyone's thoughts when engaged in plans by WYDOT to reconstruct this highway.

The Conservation Alliance believes that development, roads and human activities should reflect the care and concern for the beauty and wild landscapes we have in our valley. We believe human safety can be improved without a five-lane highway bisecting some of the most unique lands in the country, and we believe that WYDOT should use the best-available science for mitigations to assure that the harm done to this land is as minor as possible.

The Conservation Alliance is working with a growing group of community members and organizations to make sure that the best-available science is provided to WYDOT for all upcoming highway reconstruction projects slated for Teton County. We are working with one of the leading road ecology organizations in the west for a study to research the specific needs in Teton County and develop recommendations for the types and locations of wildlife crossings that will be most effective. We look forward to more conversations with WYDOT; to working together to make this project meet highway department and community needs.

The Jackson Hole Conservation Alliance and this community want to work with the Wyoming Department of Transportation toward solutions that will provide safe and efficient ways to travel while not destroying some of the very things that bring people here to visit and live.

Sincerely,

Louise Lasley, Alliance Public Lands Director