

August 15, 2011

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

Dear Mr. Potter:

The Jackson Hole Conservation Alliance has been involved with the Environmental Impact Statement for Jackson South since the beginning of the process. We have submitted comments, discussed our concerns and advocated for an alternative to the proposed 5-lane expansion. We now write to ask that the Federal Highway Administration and Wyoming Department of Transportation perform a supplemental FEIS in light of changes in circumstances. In particular, recent data that shows the expected growth rate relied on in the FEIS overstated actual growth. As a result of this data, it is clear that both actual and reasonably foreseeable traffic volumes are lower than the FEIS anticipated. Thus, the need for 5 lanes of travel for the Jackson South project, the underlying rationale for this project, is in doubt. Furthermore, Teton County has now adopted the "policies" section of its new Comprehensive Plan. Those policies reflect deeply cherished community values that are at odds with the rationale for this project, and should be considered before your agencies embark on this costly, and potentially environmentally damaging project.

Information used in the final environmental impact statement does not fit the current situation and should be reevaluated. The Conservation Alliance believes that assumptions on future growth and densities were erroneous and should not be used as means to justify a 5-lane highway rather than a 3-lane.

These assumptions are also inconsistent with the current findings in the Jackson/Teton County Comprehensive Plan revision and illustrate the problem of basing any development assumptions on a plan that is undergoing critical updating. Teton County has completed the policies component of this plan revision for local land use goals and objectives. Importantly, these future objectives are designed to 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 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 specifically targeted to move away from past patterns.

As part of the revised plan, Teton County has approved Level of Service D as an acceptable, even desirable, level of service for County roads. Policy 7.1.d states:

"To discourage automobile use, the Town and County will use "Level of Service D", as defined by the American Association of State Highway Transportation Officials (AASHTO) standards for autos, as an acceptable level of congestion and delay along existing roadways and at intersections."

Finally, the assumptions made in the FEIS are also at odds with the current local and nationwide economic downturn. Employment in Teton County has suffered greatly in this recession. Growth and development in Teton County and neighboring counties are simply not what was anticipated when the FEIS was prepared.

The Alliance therefore respectfully requests that the Wyoming Department of Transportation, and the Federal Highway Administration, prepare a supplemental environmental impact statement aimed at addressing these changes in circumstances. The assumptions made in the FEIS have proven to be inaccurate, and therefore the purpose and need for this project is in question. Let's not rush into an aggressive paving project in this extraordinary scenic and wildlife corridor, without first being certain that the project is indeed needed.

Sincerely,

Louise Lasley, Public Lands Director
Jackson Hole Conservation Alliance

cc: Tim Stark
John Eddins