



BOARD OF COMMISSIONERS

Mark Newcomb, Chairman
Wes Gardner, Vice Chair
Natalia D. Macker
Luther Propst
Len Carlman

June 30, 2025

Ms. Kelly Cope
WYDOT NEPA Supervisor
5300 Bishop Blvd.
Cheyenne, WY 82009

Re: Comments on Wyoming-22 Level 1 and Level 2 pre-NEPA Screening

Dear Ms. Cope:

Thank you for hosting a robust and well-resourced open house on June 4, 2025 in Teton County. Several County Commissioners attended, and we appreciate the additional time your project team dedicated to engaging with the public and responding to their questions.

We are grateful for the thoughtful work our transportation staff have contributed to the WY22 process and the opportunity to remain engaged as this effort advances. As the duly elected representatives of Teton County, we are writing to broaden the lens and reinforce our community's values and long-term goals. While we support our staff's comments regarding the importance of a safe and functional roadway aligned with community character, we want to underscore several key elements, particularly our community's commitment to environmental stewardship and quality of life, as adopted in our Comprehensive Plan.

Some of these priorities are reflected in the memorandum, dated May 16, 2025, from the Jackson/Teton County Transportation Advisory Committee. See Attachment A for reference. We write today to ensure that the following priorities are elevated and rigorously considered as you proceed to the next stage of screening and analysis.

1. We wish to emphasize the July 12, 2023 (accidentally dated 2022) scoping letter from both the County Commission and Town Council to WYDOT, and particularly paragraphs 10 and 11 regarding pathway connectivity and quality, and potential 4(f) facility determination. We received the 4(f) applicability subject memo (See Attachment B for reference) from FHWA dated December 2024. The memo acknowledges that Path 22 is both a recreational and transportation resource, but details the reasons that FHWA has determined that it is exempted from 4(f), citing the Code of Federal Regulations. Given this determination, we would be grateful to have a shared understanding about the allocation of expenses for construction and right-of-way acquisition for Path22 from this point forward in the WY22



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planning process and not have it arise as a complication or source of delay through later conflict.

2. Our constituents frequently express concerns over high speeds, which increase crash risk and crash severity. Constituents also express concerns over traffic flow breakdown and the unpredictability and frustration that arises from gridlock. Our staff has advised us that lower speeds (less than 50-55 mph) could 1) enable functional flows while reducing crash potential and severity, and 2) can only be achieved by designing the roadway cross-section to naturally operate at a lower speed. We need a safe, functional corridor that matches our community's desired character. A solution that minimizes gridlock while enabling safe, steady flow could balance safety and mobility, per the project Purpose & Need.
3. We would like to be informed of the NEPA class-of-action decision process regarding selecting an Environmental Assessment (EA) versus an Environmental Impact Statement (EIS). The NEPA evaluation should include a rigorous evaluation of impacts on jurisdictional wetlands and conservation easements, including the condemnation process for conservation easements, if deemed necessary. We are also interested in learning where potential wetland mitigation areas might be. County staff may be able to assist with determining suitable locations, particularly in relation to the Tribal Trail portion of the project.
4. The last opportunity elected officials had to provide formal comment on the WY22 corridor was through the adoption of the Integrated Transportation Plan (ITP), originally in 2015 and updated in 2020. Since that time, our official input on Wyoming-22 has been limited to the July 2023 comment letter and participation in public engagement opportunities. We respectfully request the opportunity to provide official comment on the recommended alternative emerging from the current screening process, prior to the initiation of the NEPA phase. Please also see paragraphs 8 and 9 below regarding our Comprehensive Plan and ITP.
5. The proposed Tribal Trail Connector (TTC) is being evaluated as part of the pre-NEPA and NEPA process, which you have advised us will include a no-build alternative. A potential TTC should be intended to improve neighborhood connectivity using a low-speed cross-section that discourages cut-through traffic. The TTC would benefit both South Park neighborhoods and neighborhoods west of Town by providing a route that does not pass through the "Y" intersection. It would also improve network redundancy, which is important for safety and emergency response, which the Board supports. As outlined in our Cooperative Agreement between WYDOT and Teton County, paragraph 5.J. "Design standards for the TTC should be consistent with its current classification, Major Collector, on the Urban Roadway Functional Classification Map, and with the incorporation of traffic calming or other context sensitive design measures" As the process continues, we would



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like to see project deliverables (such as traffic modeling), that demonstrate how the safety and mobility needs identified in the purpose and need are addressed.

6. We are aware of the relevant language on the recorded Final Plat and Master Plan for Indian Springs Ranch and 1992 WYDOT Access Permit for Indian Springs Drive, that discusses the abandonment and removal of Indian Springs Drive connection to Highway 22 if and when Tribal Trail Road is connected to Highway 22. This was intended to plan for sufficient intersection separation distances. We would like to learn if WYDOT will be pursuing the removal of Indian Springs Drive approach (therefore requiring Indian Springs Drive to either connect to Tribal Trail Road through the old highway roadbed near the fen wetland, or exit to Boyles Hill Road to the south). We encourage a detailed review and coordinated effort with County staff on how to best address the Indian Springs Drive and Coyote Canyon safety issues as they relate to a possible future Tribal Trail Road connection.
7. Teton County is engaged in a negotiation process with the Walton Ranch (owned by 4W, LLC) regarding the long-planned transfer of BLM Parcel 9/10 to Teton County, which abuts the ranch along the Snake River. It is important for the Board to have a clear understanding of the needed right-of-way in this area. It would be helpful for WYDOT to provide a detailed exhibit depicting the amount of right-of-way needed along the parcels owned by 4W, LLC, generally on the north side of Hwy 22 between Iron Rock Road and Bar Y Road. We understand that this area contains wetlands, conservation easements, and power line constraints; therefore, adequate space is crucial to provide a comfortable buffer between the road and the pathway. An exhibit will help all parties better understand their options and enable Teton County to proactively negotiate a right-of-way for the benefit of both the County-owned pathway and WYDOT.
8. The WY22 corridor runs through our “County Valley” subarea as defined in the Jackson/Teton County Comprehensive Plan. Counties have the authority and responsibility to guide future land use. Our Plan envisions the character of Highway 22—and similar roadways—evolving to include these features:
 - a. added capacity for alternative modes of travel,
 - b. mitigation of wildlife-vehicle collisions (such as through wildlife crossings), and
 - c. scenic enhancements.

The image below, from page IV-66 of our Comprehensive Plan, highlights relevant ecosystem stewardship and growth management objectives. While these policies primarily address land use, the character of WY22 should reflect and reinforce these values — supporting wildlife movement, preserving natural skylines, and protecting scenic vistas. We ask that these objectives be considered as aspects of the Community Goals (related to



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wildlife and environment), alongside the Purpose & Need as the team advances into the next level of screening and analysis.

Policy Objectives

| | |
|--|--|
| <i>Common Value 1: Ecosystem Stewardship</i> | 1.1.c: Design for wildlife permeability 1.3.a: Maintain natural skylines 1.3.b: Maintain expansive hillside and foreground vistas 1.3.c: Maintain natural landforms 1.4.b: Conserve agricultural lands and agriculture 1.4.c: Encourage rural development to include quality open space |
| <i>Common Value 2: Growth Management</i> | 3.1.b: Direct development toward suitable Complete Neighborhood subareas 3.1.c: Maintain rural character outside of Complete Neighborhoods |
| <i>Common Value 3: Quality of Life</i> | 5.3.b: Preserve existing workforce housing stock 7.1.f: Complete major transportation projects based on Major Capital Group approach 7.2.d: Reduce wildlife and natural and scenic resource transportation impacts |

9. We strongly support the continued evaluation of High-Occupancy Vehicle (HOV) lanes and/or Bus Rapid Transit (BRT) lanes to support our land use planning goals. This was a key element of the desired future condition envisioned for this segment of roadway outlined in the ITP. We have attached applicable excerpts from the ITP regarding this (see Attachment C for reference). Members of the Wyoming State Legislature whose districts include substantial portions of Teton County played key roles in 2023 to secure the passage of W.S. § 31-5-238. (Designated high occupancy vehicle lanes). The deployment of HOV and BRT lanes on WY22 was among their chief objectives in causing this law to be enacted. We are grateful for the action of the 2023 Wyoming Legislature on this matter and look forward to understanding how this new law may be put to practical use on WY22.
10. We respectfully request that your project team coordinate with County staff to schedule a workshop meeting with the Board regarding these topics and questions. We are committed to continuing to work together, as outlined in our Cooperative Agreement, and appreciate WYDOT's efforts to date.



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We look forward to continued engagement and request that these priorities be reflected in upcoming alternatives and clearly addressed in future briefings and documentation.

Sincerely,
TETON COUNTY, WYOMING

Mark Newcomb
Chair, Teton County Board of County Commissioners

Attest: Maureen E. Murphy
Teton County Clerk

Attachment A: Memorandum, dated May 16, 2025, from the Jackson/Teton County Transportation Advisory Committee

Attachment B: December 2024 4(f) determination memorandum from Federal Highway Administration

Attachment C: Excerpt from Integrated Transportation Plan (pages 27-35 'Major Capital Projects: Group 1')



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June 2330, 2025

Ms. Kelly Cope
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5300 Bishop Blvd.
Cheyenne, WY 82009

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Commented [LC1]: Confusing dates: July of 2022 and July of 2023?
Commented [LC2]: Not sure which boards, plural, to which this refers. BCC and . . . ?



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~~Act (1966) Section 4(f) property because it is a significant publicly owned recreation facility. Its concurrent use as a transportation facility by bicycle commuters and others does not change the fact that thousands of people routinely use Path22 for recreation. The anticipated widening of WY22 to better manage motor vehicle traffic flow may permanently “incorporate” portions of Path22 into WY22, (using the word “incorporate” to mean occupy and subsume, obliterating portions of the current alignment of Path22 under the asphalt of a widened WY22). In addition, it is highly likely that portions of Path22 will be “constructively used” by a wider WY 22, (where “constructive use” means the WY22 project’s proximity impacts will be so severe that the protected activities, features, or attributes of Path22 will be substantially impaired). Because of the foreseeable incorporation and constructive use of Path22 by a widened WY22, we anticipate the law will require either WyDot or the Federal Highway Administration, (FHWA), and not Teton County, to pay the costs of engineering, relocating and rebuilding adversely affected portions of Path22. Given this determination, we would be grateful to have a shared understanding about the allocation of expenses for ~~role of Section 4(f)~~ construction and right-of-way acquisition along for Path22 from this point forward in the WY22 planning process and not have it arise as a complication or source of delay through later conflict. Please let us know if we can assist you in any determination you and FHWA may believe is needed to settle this matter.~~

-
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- 4. The last opportunity elected officials had to provide formal comment on the WY22 corridor was through the adoption of the Integrated Transportation Plan (ITP), originally in 2015 and updated in 2020. Since that time, our official input on Wyoming-22 has been limited to the July 2023 comment letter and participation in public engagement opportunities. We respectfully request the opportunity to provide official comment on the recommended alternative emerging from the current screening process, prior to the initiation of the NEPA phase. Please also see paragraphs 8 and 9 below regarding our Comprehensive Plan and ITP.
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5-6. We are aware of the relevant language on the recorded Final Plat and Master Plan for Indian Springs Ranch and 1992 WYDOT Access Permit for Indian Springs Drive, that discusses the abandonment and removal of Indian Springs Drive connection to Highway 22 if and when Tribal Trail Road is connected to Highway 22. This was intended to plan for sufficient intersection separation distances. We would like to learn if WYDOT will be pursuing the removal of Indian Springs Drive approach (therefore requiring Indian Springs Drive to either connect to Tribal Trail Road through the old highway roadbed near the fen wetland, or exit to Boyles Hill Road to the south). We encourage a detailed review and coordinated effort with County staff on how to best address the Indian Springs Drive and Coyote Canyon safety issues as they relate to a possible future Tribal Trail Road connection.

Commented [LC3]: I agree with the ambition of this sentence, but it sets us up for failure. Drivers will use a TTC for uncountable purposes including convenience, perceived shortcutting, time-saving, sight-seeing, etc etc. Because a huge range of reasons will motivate drivers, let's cut this sentence.



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Policy Objectives

Table with 2 columns: Common Value and Objectives. Rows include Ecosystem Stewardship, Growth Management, and Quality of Life with their respective sub-objectives.

- 9. We strongly support the continued evaluation of High-Occupancy Vehicle (HOV) lanes and/or Bus Rapid Transit (BRT) lanes to support our land use planning goals.
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We look forward to continued engagement and request that these priorities be reflected in upcoming alternatives and clearly addressed in future briefings and documentation.



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Sincerely,
TETON COUNTY, WYOMING

Mark Newcomb
Chair, Teton County Board of County Commissioners

Attest: Maureen E. Murphy
Teton County Clerk

[Attachment A: Memorandum, dated May 16, 2025, from the Jackson/Teton County Transportation Advisory Committee](#)

[Attachment B: December 2024 4\(f\) determination memorandum from Federal Highway Administration](#)

[Attachment C: Excerpt from Integrated Transportation Plan \(pages 27-35 'Major Capital Projects: Group 1'\)](#)

ATTACHMENT A



MEMORANDUM

TO: WYDOT WY-22 Project Team

FROM: Jackson/Teton County Transportation Advisory Committee

DATE: May 16, 2025

SUBJECT: WY22 Preliminary NEPA - Level 2B Corridor Screening Comments

The Transportation Advisory Committee (TAC) thanks the Wyoming Department of Transportation and the Jacobs team for their continued partnership and willingness to engage in robust dialogue regarding potential improvements to the WY-22 corridor. As representatives of local government agencies and community interests, we understand the significance of this corridor not just for regional mobility, but for safety, livability, and community character.

We appreciate the opportunity to offer formal comments on the pre-NEPA alternatives and associated design elements. The following feedback reflects our commitment to the adopted guiding documents: the Comprehensive Plan and Integrated Transportation Plan. Our comments are organized by major themes that emerged during recent TAC discussions and align with the evaluation lenses of safety, multimodal mobility, and long-term community goals as prioritized by staff to develop our October 22, 2024 memorandum.

1. Safety: The Paramount Consideration

- **Design Speed:** The TAC supports a corridor design speed of 45 mph or less, aligning with our shared safety priorities. A lower design speed supports reduced crash severity, enhanced turning movement safety, and increased pedestrian and bicycle safety. WYDOT indicated that the corridor cross-sections may not change significantly unless the design speed is lowered to 35 mph. As noted in our October 2024 comments, “the section of WY22 being evaluated connects Wilson, Teton Village, and the Town of Jackson. All the connecting facilities have a speed limit between 30-45 mph during the day and 30-35 mph at night. A reduced design speed will result in a safer, narrower, and more reliable facility.” A 35-mph design speed could be appropriate given the speeds on these other facilities. The posted speed should also reflect the design speed, and we are willing to work with WYDOT and the state to ensure design and posted speeds that reduce crash frequency and severity for the millions of humans and wildlife that travel along this corridor.



- **Roundabout Safety Function:** While roundabouts (RABs) can provide traffic calming benefits, their effectiveness as traffic calming features is diminished if bypass lanes are included. Free-flow movements can undermine the intended metering effect, particularly at Spring Gulch and 'the Y' (the intersection between US-89/191 and WY-22). We question the necessity of a northbound bypass at the Spring Gulch RAB.
- **Signage and Driver Comprehension:** WY-22 sees heavy volumes of out-of-town visitors and infrequent drivers. Designs should minimize reliance on complex signage and instead rely on physical, intuitive features to guide behavior. Treatments such as right-in/right-out designs, physical medians, and clear channelization are preferred over signage or education campaigns.
- **Intersection Safety:** The scale and complexity of proposed 7-8 lane intersections at the Y are concerning. Such configurations are likely to create confusion and compromise safety, especially for pedestrians and cyclists.
- **Typical Section Lane Widths:** TAC did not have the opportunity to discuss lane widths in detail, but we would like to understand the implications of 11-foot lanes instead of 12-foot lanes in the typical sections.

2. Multimodal Mobility and Access

- **Transit and Mode Choice:** Multimodal infrastructure should be prioritized in every segment, including transit travel time reliability improvements such as queue jumps and pedestrian structures. However, these elements must be clearly safe and navigable in winter conditions.
- **Pedestrian/Bike Access:** Specific attention should be paid to safe connections across and along WY-22. This includes attention to the following:
 - Crossing opportunities at or near Tribal Trails, and to Teton Science Schools Mountain Academy.
 - Multimodal access to Search and Rescue Road and West View Condos, which is currently unclear.
 - Bridge segments, particularly Fish Creek, must include adequate width for pathway accommodation.
 - TAC would like to reiterate the statement from the original July 2023 scoping letter from elected officials, that design alternatives include 'continuous, separate pathways that meet or exceed the connectivity of the existing conditions and are designed to modern best practices and guidelines'.



- **Community Character:** The TAC is concerned that the current alternatives prioritize vehicle throughput over person throughput. Wide intersections and highway-like features are inconsistent with our goals to promote alternative transportation. Community character and visual impacts are important to the NEPA evaluation.
-

3. Physical Design to Drive Behavior

- **Access Management and lane add/drops:** WY-22 is not a controlled-access facility and should not be treated as such. With many driveways and access points, designs must acknowledge this 'rural arterial' reality, incorporating appropriate turn lanes and signalization. Lower design speed will support safer acceleration and deceleration for those trying to access and egress the facility, and could potentially simplify development lengths for acceleration and deceleration lanes under the 4-lane and 5-lane alternatives.
 - **Curb/Gutter and Medians:** We support the inclusion of continuous curb and gutter treatments from Spring Gulch to US-89, both from a drainage and ROW impact perspective. TAC also supports further exploration of vegetated medians and curb-and-gutter to reduce the footprint and enhance corridor safety and aesthetics. Given the number of driveways (between Mallard Lane and the Y) that someone could pull into if they are experiencing automotive issues, is an 8-foot shoulder throughout the section necessary, or could a 2-foot curb-and-gutter from Mallard to the Y enhance WY-22 as a community gateway and reduce the width of the necessary cross-section for a similar or lower cost?
-

4. Community Gateways and Traffic Calming

- **Gateway Vision for RABs:** The TAC envisions the roundabout at Spring Gulch functioning as a community gateway and traffic calming element, not merely as a throughput tool. Physical and visual design cues should signify entry into a populated area.
 - **Footprint Aesthetic Concerns:** Multiple committee members voiced concern over the visual impacts of wide intersections and excessive hardscape. These designs could trigger strong public opposition and are at odds with the rural and scenic qualities valued by the community.
-

5. Impacts: ROW, Visual, and Constructability

- **ROW and Visual Impacts:** Design alternatives that improve safety for all users are preferred. Sensitivity is needed in constrained areas such as:
 - Walton Ranch (consider small alignment shifts and vertical vs. horizontal separations)



- East of Coyote Canyon (challenging slope)
 - Segment 2 intersection footprints and Segment 3 property edges
 - **Design Adaptability:** The NEPA process should evaluate a slightly wider disturbance envelope to allow adaptability for potential future discoveries, such as wetlands.
 - **Property Impacts:** Additional property sketches will be essential for evaluating stakeholder impacts and preparing for public outreach, such as for property accesses near the Y.
-

6. Wildlife and Pathway Integration

- **Pathway/Wildlife Fence Alignment:** The TAC strongly recommends that wildlife fencing and the pathway not cross one another. Designs should keep the fencing consistently on one side, with careful alignment to minimize the number and complexity of crossings. These should be evaluated early, before final design.
-

7. Constructability and Implementation Practicalities

- **Winter Maintenance:** Winter conditions in the corridor demand that designs accommodate plowing operations. Variations in lane widths, curbing, and island placement should be evaluated for plowability.
- **Queue Jump Feasibility:** Intersections like Buffalo Way raise questions about how queue jump lanes function with potential cul-de-sac conditions for unfamiliar drivers. Clarity and predictability must be built into these designs, e.g. an arm bar that only lifts for buses if the leg is restricted to START buses.
- **Operational Flexibility:** The TAC supports design solutions that retain operational flexibility, particularly opportunities for future transit enhancements, including high-occupancy vehicle lanes. The lanes could be deployed during peak hours only, if needed, for vehicles with e.g. three or more passengers. The image below depicts a bus-only lane that requires limited signage, however an HOV lane on WY-22 could permit any vehicle above a selected threshold to encourage carpooling.



Image Source: Seattle.gov

We recognize that many of these discussions are based on preliminary concepts. However, the TAC believes that embedding these priorities into the early NEPA evaluation will strengthen the project's alignment with community values and long-term plans.

Thank you for considering our input as this process advances. We welcome continued collaboration and look forward to engaging further during the June 4, 2025 public meeting and beyond.

ATTACHMENT B

WY 22 CORRIDOR PROJECT

Memorandum

Subject WY-22 Pathway Section 4(f) Applicability

Project Name 2000061: WY-22 Corridor Project – Jackson to Wilson

Attention WY-22 Corridor Project Team

From Bob Bonds, FHWA Area Engineer

Date December, 2024

Copies to Luther Post, Chairman, Teton County Commissioners
Project File

This memo documents FHWA’s analysis of the application of Section 4(f) to the WY-22 Pathway in the context of the WY-22 Corridor project. Section 4(f) refers to the original section within the U.S. Department of Transportation Act of 1966 which provided for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to the U.S. Department of Transportation (U.S. DOT) and is implemented by the Federal Highway Administration (FHWA) and the Federal Transit Administration through the regulation [23 Code of Federal Regulations \(CFR\) 774](#).

The WY-22 Corridor contains a pathway that generally connects the Wilson community to the Town of Jackson, running approximately parallel to WY-22, referred to herein as the WY-22 Pathway. Most of the WY-22 Pathway between Jackson and Wilson lies in the WYDOT right-of-way and operates under a series of encroachment permits that WYDOT issued to Teton County.

The WY-22 Pathway is described in several adopted local transportation and land use plans as an integral part of the multimodal transportation system. The [2007 Pathways Master Plan](#) notes that “Pedestrians and bicyclists are an integral element of a balanced transportation system” and that pathways “can create opportunities for people to replace driving trips with active transportation”. The pathway program is featured prominently in the 2020 [Jackson/Teton Integrated Transportation Plan](#) as a means to meet key transportation goals including managing travel demand and reducing vehicle miles travelled (VMT). Jackson and Teton County were awarded \$20 million in federal BUILD (Better Utilizing Investments to Leverage Development Transportation Discretionary) grant funding in 2020. The grant is funding improvements to the pathway system to address ‘long-standing transportation needs’ including reduced congestion and VMT. FHWA acknowledges and agrees the WY-22 Pathway is an integral part of the WY-22 corridor’s multimodal transportation system.

The WY-22 Pathway between Jackson and Wilson is also recognized as an important recreational resource in the aforementioned planning documents. In describing the system needs and benefits overview, The 2007 Pathways Master Plan states “Pathways have a wide range of benefits. These include...non-motorized transportation, recreation, health/fitness, environment, economic

development, tourism, and quality of life”. Similarly, the Jackson/Teton Integrated Transportation Plan recognizes “Jackson Hole has attracted people who seek out and value opportunities to be active and to engage in outdoor recreation activities...in response to these trends, the Town/County pathways program has developed a national-caliber network of trails and bicycling facilities that provide significant benefits to residents”. However, its emphasis as one component of the multi-modal “active” transportation system is evident in the description and planning of the WY-22 Pathway in the overarching corridor planning documents.

Section 4(f), 49 U.S.C § 303, 23 U.S.C. § 138, and its implementing regulations, 23 C.F.R. § 774, prohibit the use of land from significant publicly owned public parks, recreation areas, and wildlife or waterfowl refuges, or any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places, unless there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties; or, FHWA makes a finding that the project has a de minimis impact on the Section 4(f) property. Exceptions to this requirement are established in 23 C.F.R § 773.13. Among them, subsection (f)(3) provides that certain trails, paths, bikeways, and sidewalks, are not subject to Section 4(f) under certain circumstances, including “[t]rails, paths, bikeways, and sidewalks that occupy a transportation facility right-of-way without limitation to any specific location within that right-of-way, so long as the continuity of the trail, path, bikeway, or sidewalk is maintained.” Subsection (f)(4) also includes an exception for “[t]rails, paths, bikeways, and sidewalks that are part of the local transportation system and which function primarily for transportation.” FHWA’s Section 4(f) Policy Paper, Part II, Section 15 provides additional guidance on application of these exceptions. It instructs that in establishing the exception “it should be determined whether or not a management plan exists that addresses the primary purpose of the facility in question,” and that regardless, “every reasonable effort should be made to maintain the continuity of existing and designated shared use paths and similar facilities.” Further, it states, “[i]f a path or trail is simply described as occupying the right-of-way of the highway and is not limited to any specific location within the right-of-way, a use of land would not occur provided that adjustments or changes in the alignment of the highway or the trail would not substantially impair the continuity of the path or trail.”

The WY-22 Pathway meets two Section 4(f) exceptions in 23 CFR 774.13. First, it meets exception 23 CFR 774.13(f)(3) because it is located within the transportation facility right-of-way of WY-22. WYDOT is committed to maintaining pathway connectivity and has included the need to “support a multimodal transportation corridor” in the purpose and need statement and “maintains pathway connectivity” as a criterion in the alternatives evaluation. The WY-22 Pathway operates within the WYDOT right-of-way through a series of encroachment permits issued to Teton County as various segments of the pathway were completed. The encroachment permits clearly document and identify the conditions of operations within the right-of-way. Second, the WY-22 Pathway meets exception 23 CFR 774.13(f)(4) as a bikeway that is part of the local transportation system which functions primarily for transportation. As evidenced in the 2007 Pathways Master Plan and Jackson/Teton Integrated Transportation Plan (summarized above), the WY-22 Pathway’s primary purpose and function is as part of the transportation system connecting Jackson and Wilson. While the WY-22 Pathway’s function as a recreational resource is also acknowledged as important, it is not the WY-22 Pathway’s primary function. Therefore, in reviewing the available transportation planning documents, right-of-way information, encroachment permits, and applicable CFR regulations and policy paper, FHWA has determined that Section 4(f) does not apply to the WY-22 Pathway between Jackson and Wilson.

ATTACHMENT C



5. MAJOR CAPITAL PROJECTS

Strategic Capital Programming

MAJOR CAPITAL PROJECTS OVERVIEW

The three entities (transportation partners) involved in implementing this Plan (Town of Jackson, Teton County, Wyoming DOT) have limited resources for capital investment. The highest capital priority for each of these agencies will be placed on maintaining existing facilities (all modes) in a “state of good repair.” The relative priority of specific investments will be guided by system preservation and efficiency needs and will fall in these categories:

- Maintenance and upkeep of existing facilities;
- Recapitalization of existing facilities – replacement, rehabilitation and repair; and,
- System operations and demand management.

Transportation capital project investment priorities will be guided by the following six capital investment principles:

1. Network Approach. Lack of road and street connectivity represents a significant challenge in Jackson Hole. Major capital investments in specific corridors will be made based on network analysis, not in isolation one corridor at a time. Design measures will be applied in project development to avoid use of local connections by cut-through and regional bypass traffic.
2. Interagency Coordination. Close cooperation and collaboration between the Partners will occur continuously from initial needs analysis, through capital programming (including the State Transportation Improvement Program), conceptual planning and design, final design, right of way acquisition and construction. This coordination among the partners will be facilitated by formation of a Regional Transportation Planning Organization (see Chapter 6).
3. Multimodal Function. Capital investments will be planned and designed to provide multimodal corridors that support access and circulation by all modes. The Partners will look for opportunities to improve the safety and convenience of active transportation (walking, bicycling, etc.), and to increase the efficiency and competitiveness of transit operations. Project prioritization, planning and design will be guided by Comprehensive Plan Principle 7.1, “Meet future transportation demand with walk, bike, carpool, transit, and micromobility infrastructure.”
4. Strategic Timing. Significant uncertainties in travel behavior trends, population growth and economic development cloud the partners’ ability to forecast exactly when, if ever, certain major capital investments will be needed. To avoid premature investment in potentially-needed future capital projects while at the same time ensuring adequate time for project development of projects that become necessary, the Partners will use a benchmarking system to guide timing of project development and construction of major capital projects.
5. Project Development. Major transportation capital projects are important and thus inherently controversial. Effective public involvement in planning and design will be essential to successful project development. Each of the projects in Groups 1 – 4 will be developed from initial planning through conceptual design, final design

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and construction according to a project chartering process described in the PROJECT DEVELOPMENT SECTION at the end of this chapter. In addition, more specific provisions for Capital Group 1 are provided in Appendix L.

6. Level of Service. Capacity-based approaches to roadway network decision-making are inconsistent with best practices in modern transportation planning and engineering. Further, traditional measures such as “level of service” do not meet our community’s expectations for transportation efficiency. The national experience with roadway congestion has shown that trying to “solve” it has been counterproductive, leading to induced traffic growth and discouraging a balanced reliance on multiple modes of travel.

Expanding roadways encourages increased driving, and in particular, encourages increased driving during peak travel periods. As a consequence, highway widening and expansion projects generate low rates of return on investment, increase carbon emissions and reduce traffic safety. All of these impacts run counter to Jackson/Teton County Comprehensive Plan objectives and strategies. In Jackson Hole, the fact that key roadways have been “full” during summer months appears not to have dampened economic vitality. Rather, roadway congestion appears to have encouraged more reliance on walking, bicycling and transit ridership, with the collateral benefits of protecting community character and quality of life for residents.

The Partners will invest available federal, state and local transportation funds only to increase the efficiency, safety and multimodal functionality of the roadway network. Roadway widening projects will be funded only where they are designed primarily to benefit transit travel times (Principle 3, above). New roadways will be allowed or required only where they improve local connectivity (Principle 1, above). However, if such projects also have the incidental effect of marginally increasing traffic capacity, that will not disqualify them from being funded, required or allowed.

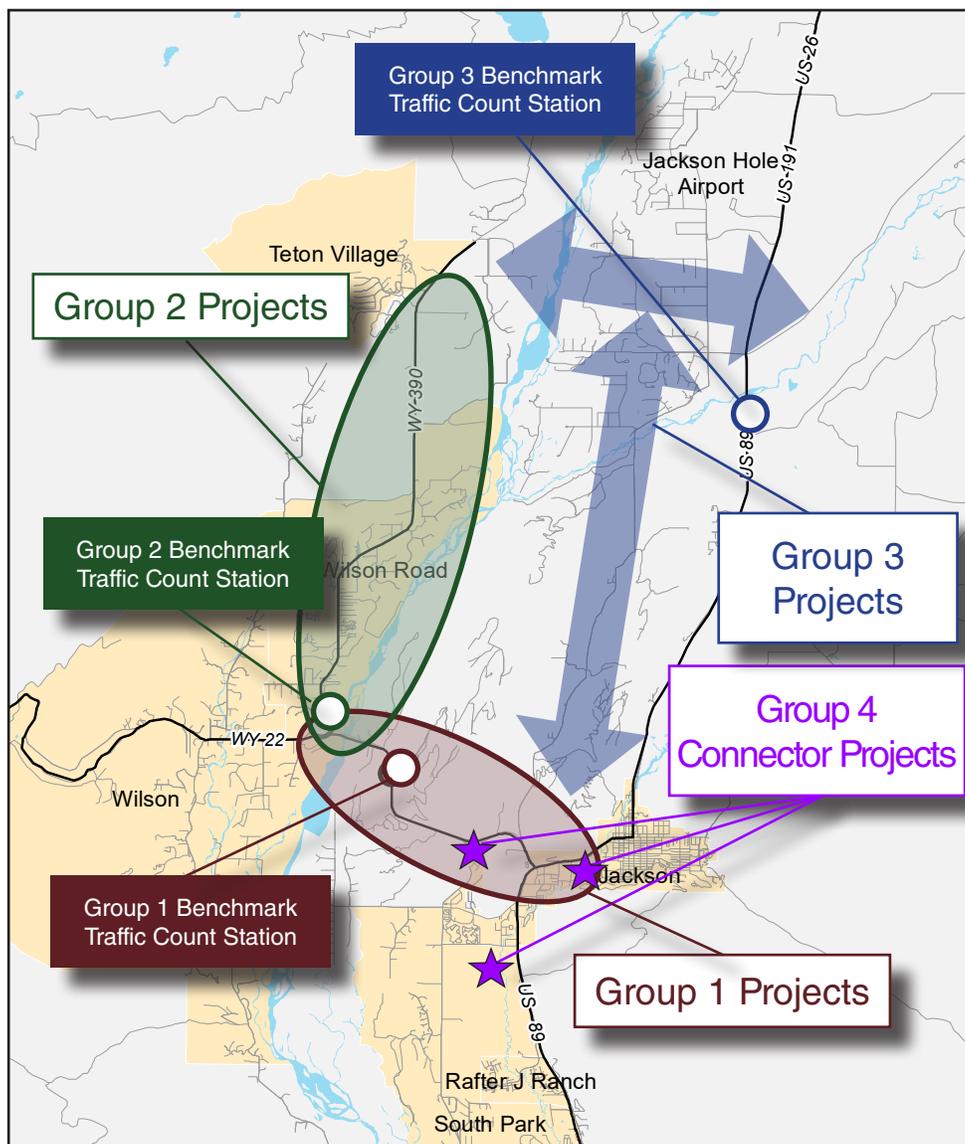
Grouping Major Capital Projects

Each major capital project group (listed in Table 5-1) is designed to address existing (or future) traffic congestion and multimodal connectivity along a particular state highway corridor. Groups 1 and 2 represent interrelated projects that will jointly address the needs of the respective corridor. Group 3 lists several alternatives to be evaluated to address congestion on US-89 north and south of Jackson. Group 4 projects are high priority local connector projects.

Table 5-1. Major Capital Project Groups

| Group 1 WY-22 (Jackson – WY-390) | Group 2 WY-390 | Group 3 Regional Connections | Group 4 Key Local Connections |
|---|--|---|--|
| <ul style="list-style-type: none"> • Multimodal Reconstruction of the “Y” Intersection • Completion of the Tribal Trail Connector • WY-22 Improvements to Accommodate Transit Travel Time and Efficiency, including HOV lanes • WY-22 Pathway (Wilson – Jackson) • Multimodal Reconstruction of the Intersection of Spring Gulch and WY-22 • Wildlife Permeability (based on the WYDOT PEL Study) | <ul style="list-style-type: none"> • WY-390 Multimodal Improvements (WY-22 – Teton Village) • Multimodal Reconstruction of the Intersection of WY-390 and WY-22 • Wildlife Permeability (from PEL Study) • Bus Rapid Transit (Jackson - Teton Village) | <ul style="list-style-type: none"> • Pave and Upgrade Spring Gulch Road • Fixed-Guideway Transit • New North Network Connector | <ul style="list-style-type: none"> • Tribal Trail Connector (also in Group 1) • East-West Connector(s) in South Park • Maple Way - Snow King Corridor |

Figure 5-1. Major Capital Project Group Locations and Benchmark Traffic Count Stations



IDENTIFYING PROJECTS

All of the projects in these groupings were considered to be of regional significance in one or more of the following sources:

- 2020 Jackson/Teton County Comprehensive Plan
- 2014 Wyoming Highway 22 and 390 Planning and Environmental Linkages Study commissioned by WYDOT (WYDOT PEL study)
- Jackson/Teton Integrated Transportation Plan (ITP) planning process.

BENCHMARKS

As changes in mobility and demographic trends have accelerated in recent years – nationally, throughout the western states, and in Jackson Hole – forecasting of travel demand has become more challenging (See Chapter 1). The transportation partners (Town of Jackson, Teton County and Wyoming DOT) will employ indicators and benchmarks to manage uncertainty and guide major capital project planning and implementation. The indicators/benchmarks system will allow the partners to determine when project development activities should commence and when construction should begin. The system will rely on average summer month traffic data (June - September) for roadway capacity projects and on average summer month transit ridership for implementation of high capacity transit projects.

Table 5-2 shows the indicators and benchmarks to be used in planning, programming and scheduling project development activities for capital projects in Groups 1 - 3. Benchmarks for the major capital project groups will rely on existing permanent traffic count locations – automatic traffic recorders (ATRs) – maintained by WYDOT. This will allow monitoring the benchmarks with readily-available data. The ATR locations and traffic volume triggers for the project benchmarks are shown in Table 5-2 and mapped in Figure 5-1.

Traffic volume triggers for each benchmark are based on the following three criteria:

- Average summer month weekday traffic volumes. Currently, daily traffic on Teton County roadways peaks in July. This trigger will use an average of the four summer months (June, July, August and September).
- Project Development. Before construction of major state highway projects or other major federally-funded transportation corridor projects can commence, a project development process must be completed, beginning with project listing in the State Transportation Improvement Program (STIP), followed by environmental analysis, design engineering and right-of-way acquisition. State highway projects require about five years of project development. Accordingly, the benchmarks for initiating highway corridor project development in Capital Project Groups 1 and 2 are set at about five years (1st Benchmark) before the point at which Wyoming DOT’s policies would call for it to begin construction (2nd Benchmark) of a remedial project.
- Environmental Process. The Capital Group 3 alternatives would be major projects requiring a longer project development cycle, potentially including preparation of a “Planning and Environmental Linkages” (PEL) report and/or preparation of one or more environmental analyses – either environmental assessments (EAs) or environmental impact statements (EISs). This will require a longer lead time of about ten years. Accordingly, the 1st Benchmark for Group 3 projects is set at 86% of the 2nd Benchmark traffic – about 17,200 vehicles per average summer weekday.

Table 5-2. Major Capital Project Group Benchmarks

| Capital Project Group | | 1 | 2 | 3 |
|--------------------------------|--------------------------|------------------------------|----------------------------|----------------------------|
| First Benchmark | | Preliminary Engineering | Preliminary Engineering | NEPA/PEL |
| Traffic Trigger | | 18,600 VPD | 14,136 VPD | 17,200 VPD |
| Second Benchmark | | Construction | Construction | Construction |
| Traffic Trigger | | 20,000 VPD | 15,200 VPD | 20,000 VPD |
| Indicator Count Station | | WY-22 - MP 2.85 ATR # 158 | WY-390 MP 0.1 ATR # 141 | US 26 MP 160.5 ATR # 84 |
| 2019 | Actual Average | 23,400 VPD | 15,166 VPD | 13,858 VPD |
| 2024 | Baseline Forecast | 23,800 VPD | 16,800 VPD | 14,000 VPD |
| | Plan Scenario | 22,700 VPD | 15,900 VPD | 13,400 VPD |
| 2035 | Baseline Forecast | 27,000 VPD | 19,500 VPD | 15,800 VPD |
| | Plan Scenario | 24,400 VPD | 17,300 VPD | 14,300 VPD |

* VPD = vehicles per average summer weekday (Jun-Sep)

MAJOR CAPITAL GROUP DESCRIPTIONS

Group 1 Major Capital Projects – WY-22 (Jackson to WY-390)

Group 1 capital projects will improve connectivity, parallel redundancy, and multimodal functionality in the WY-22 corridor from West Jackson to WY-390. These projects are interdependent and will be planned and designed as an integrated set of multimodal network improvements. This multimodal network approach will provide opportunities to limit the footprint and related environmental and visual impact of each project and will help ensure the design process for each project is comprehensive, network-oriented and multimodal.

As Table 5-3 shows, both the project development and construction benchmarks have already been met for Capital Group 1. This confirms the conclusion reached in the Wyoming DOT PEL study that development of the following projects should be initiated as soon as possible.

Reconstruction of the Y Intersection

This intersection is an important regional multimodal facility and a gateway into Jackson. Since the 2015 ITP was adopted, Wyoming DOT has completed an interim improvement of the intersection. Future, permanent reconstruction will fully accommodate the needs of all modes (motor vehicles, bus transit, bicycle and pedestrian), including future high capacity bus transit needs, such as signal prioritization. The PEL study identified four workable design options and concluded that this intersection would have the highest priority for improvement of all the elements studied in the PEL for the WY-22 and WY-390 corridors.

Tribal Trail Connector, New Roadway

This is a new multimodal local network link (about 1/2 mile in length) that will create significant benefits in improved local and regional connectivity and circulation. The intended benefits of the new Connector will include shorter average vehicular trip lengths, route redundancy for the US-89 to WY-22 connection, removal of some local traffic from the Y intersection, and future more direct routing for START bus services connecting South Park neighborhoods to the West Bank, Teton Village and the Town of Jackson. The County and WYDOT own most or all of the right of way necessary to build this link. This project is not intended as a traffic capacity increase project, although that may be an ancillary effect of building it. It is identified as a high priority project in the Comprehensive Plan.

COMPREHENSIVE PLAN PRINCIPLES AND POLICIES RELATED TO CAPITAL PLANNING

Principle 7.1 - Meet future transportation demand with walk, bike, carpool, transit, and micromobility infrastructure.

- **Policy 7.1.a:** Increase the capacity for walking, biking, carpooling and riding transit
- **Policy 7.1.b:** Create a transportation network based on “complete streets” and “context sensitive” solutions
- **Policy 7.1.c:** Interconnect all modes of transportation
- **Policy 7.1.d:** Maximize interconnection, redundancy, and hierarchy in the transportation network
- **Policy 7.1.f:** Complete major transportation network projects based on Major Capital Group approach

Principle 7.2 - Reduce greenhouse gases from vehicles to below 2012 levels.

- **Policy 7.2.a:** Implement a Transportation Demand Management (TDM) program
- **Policy 7.2.b:** Discourage use of single-occupancy vehicles
- **Policy 7.2.c:** Explore and pilot innovative transportation solutions
- **Policy 7.2.d:** Reduce wildlife and natural and scenic resource transportation impacts

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Table 5-3. Group 1 Traffic Forecast and Benchmarks

| Group 1 Indicator Count Station WY 22 Jackson West (PC #158) | 2013 (actual traffic) | 2019 (actual traffic) | 2035 (forecast traffic) | 1st Benchmark (initiate project development) | 2nd Benchmark (initiate construction) |
|---|--------------------------|--------------------------|----------------------------|---|--|
| Summer average vehicles per weekday | 21,379 | 23,400 | 27,000 | 18,600 | 20,000 |

WY-22 Multi-Lane, Multimodal Improvements, BRT/HOV, Jackson – WY-390

The WYDOT PEL study evaluated this corridor (Segment 1) and concluded that future traffic would warrant updating the cross section, an outcome confirmed during development of the 2015 Integrated Transportation Plan. WYDOT’s future traffic forecast for this segment is 35,000 VPD (vehicles per day), up from 23,000 VPD today. The PEL study assigned Segment 1 medium priority relative to other corridor elements. Intersections along this roadway were also addressed in the PEL study and are treated here as part of the roadway project.

As part of this Update to the ITP, the Town and County have determined that widening WY-22 to support general traffic growth would be counterproductive, leading to additional, induced traffic (especially during summer months) and discouraging ongoing shifts in mode share away from driving alone. Rather than widening to four general purpose lanes for general traffic growth, the corridor should be upgraded to support the development of bus rapid transit (BRT) service between the Town and Village (see Chapter 2). Modification of this section of WY-22 will include:

- addition of either HOV lanes or exclusive BRT lanes;
- appropriate design to prioritize buses through the Y intersection and the intersection of WY-22/WY-390; and,
- appropriate design to connect the Tribal Trail Connector and other local roadways into the WY-22 corridor; but,
- no additional general purpose lanes.

The Comprehensive Plan identifies this as a high priority project. The Town and County will work actively with WYDOT to ensure local multimodal transportation objectives are met in this corridor and that a WY-22 modernization project advances as quickly as possible through the planning process into design and construction.

WY-22 Pathway, Jackson to Victor and Driggs, Idaho

This interstate, multi-use pathway will be an important regional network link, connecting several existing and planned pathway corridors in Wyoming and Idaho, and providing a key link in the long-envisioned Greater Yellowstone Trail Concept Plan.



The “Y” intersection (Broadway and WY-22) in Jackson



Tribal Trail Road will be linked to WY-22



WY-22 from Jackson to WY-390 will be improved for multimodal travel

In September, 2020, the Town of Jackson and Teton County, with other local partners, were awarded a \$20 million federal transportation grant for a range of improvements in this corridor, including completion of the pathway between Stilson (at WY-390) and the Idaho cities of Victor and Driggs. This project is assigned high priority by the Comprehensive Plan. Any remaining non-motorized needs should be addressed as part of other state and local projects in Capital Group 1.

WY-22 Wildlife Permeability, Jackson – WY-390

In order to reduce frequency of wildlife-vehicle conflicts on this section of WY-22, the WYDOT PEL study identified six locations for grade-separated crossings. In addition the PEL study recommended fencing, signage, seasonal speed restrictions, automated speed detectors and vegetation management be considered as potential tools to protect wildlife along this corridor. The 2018 Teton County Wildlife Crossing Master Plan further defined the need and proposed locations for wildlife crossing measures based upon a cost benefit analysis. These improvements for wildlife and vehicular safety will be evaluated and included in design.

Highway Incident Management Program

While highway congestion is usually attributed to traffic exceeding roadway capacity, another leading cause of highway congestion is “incidents” – episodic events that disrupt traffic at and around specific locations. Highway incidents that commonly occur in Jackson Hole include:

- Motor vehicle crashes (with other vehicles, bicyclists, pedestrians, animals and fixed objects);
- Emergency and recovery vehicle operations at crash scenes;
- Weather and natural occurrences road and lane closures (wildfires, snow storms, avalanches, flooding, seismic events and landslides);
- Highway reconstruction, rehabilitation, repair and maintenance activities;
- Disabled vehicles in the roadway or on the shoulder; and,
- Wildlife viewing distractions, with drivers slowing, stopping and/or pulling over to observe nearby wildlife (especially elk, moose and bear).

Highway incidents are responsible for about 25% of all hours of delay on US roads and streets. In Jackson Hole, with its limited roadway network, a crash or other problem at one location can back traffic up, radiating out from the incident site to affect other regional highways and even major streets in Town. Anecdotal evidence from Teton County suggests that many of the most visible and frustrating periods of congestion are related to one of the above incident types.

As a general rule of thumb, each one minute of lane blockage results in four minutes of total vehicle delay. Further, incidents tend to cascade, with one event leading to secondary crashes nearby, or with major blockages, at locations far away. Studies have shown that for each one minute of blockage or distraction from a highway incident the probability of a secondary collision increases by 2 – 3%. Law enforcement personnel, emergency service personnel, and highway workers are placed at heightened risk as the size and duration of incidents



New Snake River bridge, part of the pathway network parallel to WY-22, opened in fall 2014



WY-390 (7-mile corridor linking WY-22 with Teton Village)

increases. Further, incident-related congestion increases fuel consumption and emissions of air pollutants and carbon dioxide.

Many states and regions have had considerable success addressing incident-related traffic congestion through “highway incident management programs.” The primary elements of these programs are:

- Detection and verification;
- Communication with emergency responders;
- Motorist information;
- On-site emergency management (police, fire, ambulance, etc.);
- Traffic management at the site and at other locations as needed; and,
- Clearance (removal of obstruction and return to normal traffic flows).

Incident management tactical measures that produce especially high benefits include:

- Contracting with wrecker services to keep tow trucks/wreckers posted nearby and ready to respond in areas with frequent problems. Quickly clearing incident sites of obstructions and distractions generates significant returns in reduced congestion.
- Improving communications and information systems, using such tools as: surveillance cameras to monitor traffic flows; social media monitors to flag unfolding events; existing mobile software apps such as Google Maps, which can provide early notification of incidents; use of proprietary data sources operated by firms that compile, anonymize and provide real-time traffic flow data; and, improved interfaces with motorist information systems like 511 and motorist aid radio.
- Incident data gathering and analysis programs that compile data from crash records and other sources, revealing locations where incidents occur frequently, leading to other mitigation measures to reduce the likelihood of recurrence at those locations.

The Town and County, working through the ITP Implementation Lead, will collaborate with Wyoming DOT to implement an Incident Management Pilot in the WY-22 corridor west of Jackson. Performance data will be collected and studied to determine which techniques are most useful in the Jackson Hole setting. Based on outcomes of the Pilot, the partners will work to expand the Highway Incident Management program in other Jackson Hole corridors.

Capital Group 1 Objectives and Alternatives:

Reconstruction of the “Y” intersection at US-89 and WY-22, the extension of the Tribal Trail Connector to WY-22, and other projects in this group represent one of the key infrastructure challenges in Jackson Hole. Objectives to be used in guiding identification of alternative improvements and designs include:

- Network Approach – Project development shall use a network approach that addresses not only through traffic movements on state highways but also local circulation and connectivity needs. Network analysis will include modeling or simulation of traffic flows for different alternatives and combinations of alternatives, using current traffic data and forecasts. For example, traffic simulation will compare traffic flows with and without the Tribal Trail Connector and evaluate different “Y” intersection alternatives, including a roundabout.
- Multimodal Analysis – Alternatives shall be identified that improve safety and convenience for all modes and do not degrade the function of the network for bicycles, pedestrians or transit to achieve higher traffic level of service. The ability of bicycles and pedestrians to cross the “Y” intersection (all directions) shall not be sacrificed to vehicle flow.
- Transit Efficiency and Travel Time – Alternatives shall be prioritized that reduce transit travel times through the corridor by providing: separate bus-only or HOV lanes; intersections that prioritize and reduce delay for bus

movements; and, other improvements that decrease the ratio of bus travel time relative to driving.

- Safety – The safety of people traveling by all modes shall be a key consideration in all design. Evaluation of alternatives will take into account rates of personal injury and fatal accidents, rather than prioritizing property damage accident rates. Pedestrian and bicycle safety will be a specific priority.
- Delay – Reducing vehicular delay is an objective, but higher traffic speed is not.

Pursuant to the above objectives, design alternatives for the “Y” intersection shall include, but not be limited to:

- Roundabout – One-lane and two-lane roundabouts shall be considered.
- At-Grade Revisions – These may include an inverted continuous flow intersection, an inverted continuous flow intersection with an additional lane on Broadway, and a Florida-T signalized merge intersection with an additional lane on Broadway, as well as other feasible at-grade intersection types.
- Grade Separations – These may include various combinations of elevated ramps or a full interchange.
- Bicycle and Pedestrian Separations – These may include grade separations for bicycles and pedestrians on one or more legs of the intersection.
- Buffalo Way – The closure of the Buffalo Way leg of the intersection, or limiting of that leg to right-in and right-out movements may be considered.
- Other – Other intersection concepts not previously considered may also be included in the evaluation.

Group 2 Major Capital Projects – WY-390 (WY-22 to Teton Village)

Group 2 capital projects are interdependent and will be planned and designed as one integrated capital project with WYDOT as the lead agency. Design of the WY-22/WY-390 intersection is currently ongoing, along with conceptual design (10% drawings) of Segments 5 (WY-22 – Lake Creek) and Segment 6 (Lake Creek – Teton Village) identified in the WYDOT PEL study. This will ensure that the intersection design accommodates the future WY-390 cross-sections and sets the stage for future land use management decisions by the County and access management decisions by WYDOT.

Timing of project development and construction of Group 2 capital projects will be determined by the first and second benchmarks average summer weekday traffic levels at the WYDOT ATR #141 on WY-390. Conceptual design may address the difference in context of the southerly section of WY-390, which has an urbanizing character, and the roadway further north, which is more rural in character. Design options may include access management techniques to minimize the amount of highway expansion required.

Table 5-4 indicates that traffic volumes along WY-390 in 2019 were already at or above the Benchmark for initiating project development of Group 2 Major Capital Projects. Average summer weekday traffic on WY-390 in 2014 was 14,575 VPD, just above the level established as the benchmark for initiation of project development. Under the Baseline Scenario forecast (which assumes no interventions), project development should be initiated now with construction beginning in about 2020.

Table 5-4. Group 2 Traffic Forecast and Benchmarks

| Group 2 Indicator Count Station WY 390 Teton Village (ATR #141) | 2014 (actual traffic) | 2019 (actual traffic) | 2035 (forecast traffic) | 1st Benchmark (initiate project development) | 2nd Benchmark (initiate construction) |
|--|--------------------------|--------------------------|----------------------------|---|--|
| Summer average vehicles per weekday | 14,575 | 15,166 | 19,500 | 14,136 | 15,200 |