From:	Tim Young
To:	Town of Jackson; County Commissioners
Subject:	West Broadway-Buffalo Way-WY22 Intersection Comment
Date:	Saturday, November 12, 2016 5:31:53 PM

Dear Jackson Town Council and Teton County Commissioners,

I'm writing to comment on the proposed changes WYDOT has recently proposed for to the 4-Way intersection of West Broadway, WY-22, and Buffalo Way. Thank you for your engagement in this at the JIM meeting, and for representing our community's needs in this important project.

As proposed, the project raises deep concerns in four critical areas: 1. Access to and from the Town street system to the State Highway system; 2. Adherence to the goals of the Comp Plan and Integrated Transportation Plan; 3. The need to follow NEPA with a meaningful public involvement process; 4. Providing essential accommodation of transit, bicycle, and pedestrian modes in all transportation projects.

1. Access to and from the Town street system to the State Highway system. The WYDOT proposal severely impacts the legitimate access needs of Town of Jackson residents and everyone traveling from from the busy West Jackson commercial areas along Buffalo Way that desire west bound access to WY-22, and for right turn access for US-89 south bound movements.

While there are currently congestion problems with north bound motor vehicle traffic on US-89 making the left turn onto WY-22, forcing a second left turn lane at the expense of severely restricting Town access to use Buffalo Way for west and south turning movements simply shifts the current problem from the 4-way intersection to Scott Lane and Maple Way lights, both of which are also highly congested, and to the unsignalized intersections at Meadowlark, Powderhorn, and Virginian Lane. Forcing west bound traffic from Buffalo Way to make right turns only onto Broadway will also create dangerous U turns from frustrated people trying to get to 22, like Town residents going to work or ski in Teton Village, or the START Bus routes which use that critical access.

2. Adherence to the goals of the Comp Plan and Integrated Transportation Plan. This is a tipping point for our community Comprehensive Plan transportation goals, and we need your leadership. WYDOT's proposed redesign of the 4-way intersection fails to meet the Comp Plan or ITP goals that mandate all projects must safely accommodate all users of the public right-of-way.

Alternatives must be developed to make a better functioning intersection for all modes of travel. Please be firm in demanding that WYDOT go back to the drawing board and develop real solutions that meet community planning goals.

3. The proposed project is clearly a failure to comply with NEPA, with a total lack of a meaningful public process and dictatorial approach to transportation planning being fast-tracked by the Wyoming Department of Transportation. The WYDOT Local Engineer stated:

> "WYDOT will hold a meeting with the Town to let them know what we are doing and hold a public meeting to let them know what we are doing. This work is being done

> under a Cat Ex. No formal public process. With this being a technical improvement to an intersection, we will rely on our experts to determine the proper intersection design for this short term solution."

That is frightening, and even worse, WYDOT's lack of NEPA compliance is becoming a pattern, as seen in the Truck Ramp CE recently used on Teton Pass, and the WY-390/22 Intersection just this summer. There is no question - this proposed project fails to comply with the National Environmental Policy Act (NEPA). Its a multi-million project that far exceeds the level of impacts that can be moved forward under a Categorical Exclusion, which basically does not require any public comment or review. WYDOT's project creates significant impacts to bike/pedestrian/transit access, and has harsh impacts to Town of Jackson travel patterns and planned land use for the area. Such severe impacts do not qualify as a "technical improvement."

For the record, The FHWA defines Categorical Exclusions as (23 CFR §771.117 (a)):

"Actions which meet the definition contained in 40 CFR 1508.4, and, based on past experience with similar actions, do not involve significant environmental impacts. They are actions which: do not induce significant impacts to planned growth or land use for the area; do not require the relocation of significant numbers of people; do not have a significant impact on any natural, cultural, recreational, historic or other resource; do not involve significant air, noise, or water quality impacts; do not have significant impacts on travel patterns; or do not otherwise, either individually or cumulatively, have any significant environmental impacts."

Clearly, this project fails to meet that test.

4. The 4-Way Intersection must function for bicyclists, pedestrians, and transit users as well as for motor vehicles. In its current form, the proposed redesign will have significant negative impacts to bicyclist and pedestrian safety, and to transit access. Redirected motor vehicle access will also impact bicycle and pedestrian traffic on adjacent town streets.

Any change to the 4-Way WY22/US89/Buffalo Way intersection must address the community's goals of creating safe, efficient access for transit, bicyclists, and pedestrians in addition to improving traffic flow for motorists.

There was no staff report posted on the Town Website, so it is not clear what information is available on land use changes. But it is clear there are major land use changes on the horizon on the west side of the intersection, which will only increase the importance of addressing the bike, pedestrian, and transit users access needs in any redesign of the 4-Way intersection.

The Town Council and County Commission should request qualified engineering expertise be brought into this project that can address the alternative transportation modes. The design challenges of this project exceed the typical WYDOT intersection designs. One option that should be developed is incorporating elements of a "protected intersection" to the design in order to improve safety for people on foot or bike.

By doing this, the project has an opportunity to improve conditions for all users—bicyclists, pedestrians, and transit riders included—in addition to increasing the capacity for motor vehicles. Without these changes, the intersection will fail to be safe or accessible for cyclists and pedestrians and will fail to meet the goals of Town and County planning efforts.

Thank you for considering these comments. Unfortunately I'm out of town for the JIM meeting Monday, but would like you to keep me informed as this project develops. If it would be helpful, I'd be happy to assist the town with gathering additional professional advice to explore better design solutions to the challenges of this important 4-Way intersection.

Best regards,
Tim

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Tim Young
Executive Director
Wyoming Pathways
tim@wyopath.org
307-413-8464
www.wyopath.org
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