



Hagen Hammons  
Community Planner  
U.S. Department of Transportation  
Federal Highway Administration – Central Federal Lands  
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March 13, 2023

RE: Teton Pass Corridor Study – Considered Capital and Operational Options

Dear Mr. Hammons:

The City of Victor, Idaho (Victor), City of Driggs, Idaho (Driggs), City of Teton, Idaho (Teton), and Teton County Board of County Commissioners (County) jointly submit the following letter to the Federal Highway Administration – Central Federal Lands (FHWA) office regarding the draft Teton Pass Corridor Study (Study).

Every day that Teton Pass is open to vehicle traffic, thousands of our residents use the Corridor to travel to work. In all seasons, many residents of both Teton Counties and our visitors from throughout the nation and beyond enjoy recreation opportunities that are accessed through the Teton Pass Corridor. The safety and well-being of our residents and visitors who travel the Teton Pass Corridor are of paramount importance to all of Teton Valley, Idaho.

Victor, Driggs, Teton, and the County provide our joint comments and recommendations with our mission, values, and community in mind. We all share common values as expressed in our respective Comprehensive Plans and other documents that address resident and visitor safety and well-being, economic opportunity, protection of our natural resources, living compatibly with wildlife, and provision of recreational opportunities for our residents and visitors. Idaho Highway 33 is the downtown Main Street for each of our cities and really for all our Teton Valley community. As such, Idaho Highway 33, beyond its role in connecting our valley to neighboring communities, is the forward face of our downtowns, a major feature of our collective wish to represent ourselves as a rural, tourist friendly community. Idaho Highway 33 through its connection to Wyoming Highway 22 is a vital part of a safe Teton Pass corridor that supports our community members and economies while protecting the robust wildlife populations and recreational opportunities that are found there.

Teton County, Idaho is the fastest growing county in eastern Idaho. Since 1990, the population of Teton County, Idaho has grown by 157% ([Valley Advocates for Responsible Development](#)). Teton County, Idaho is also becoming an outdoor recreation mecca that is beginning to rival its famed tourism destination to the east. The Teton Pass Corridor is a highly used travel and economic linkage between the two Teton counties. Based on the March 2022 [Teton Regional Housing Needs Assessment](#) 13% of Teton County, Idaho residents commute daily to Teton County, Wyoming for employment opportunities. The communities of Teton County Idaho and Wyoming are connected by culture, commerce, natural resources, and Teton Pass.

The Teton Pass Corridor Study has identified the scope of the study area to include Wyoming Highway 22 from the Stilson Transit Center in Wilson, Wyoming west connecting to Idaho



Highway 33 and terminating at the Victor Transit Center in Victor, Idaho. It is in the best interest of the residents of Teton County, Idaho that the Capital & Operational Options & Scenarios be inclusive of the entire corridor as stated. The local governments of Victor, Driggs, Teton, and Teton County, Idaho recognize that the scope of the Teton Pass Corridor Study was requested by Teton County, Wyoming, and the Wyoming Department of Transportation (WYDOT) through a Federal Land Access Program (FLAP) grant. We are eager to be a part of the study dialogue.

#### **Feedback Form Question 4 - Operational Interventions:**

- The draft study relies heavily on Strava data to inform where recreation is occurring along the Teton Pass Corridor. What other data sets have been analyzed? Has traffic data from WYDOT and Idaho Transportation Department (ITD) been analyzed?
- Recreation opportunities exist throughout the entire corridor. Recreationists originate from communities in both Idaho and Wyoming and beyond. The Study implies that most recreational visits originate in Wyoming. Is there a data set demonstrating where recreationists originate? Teton County, Idaho is the fastest growing county in eastern Idaho. All indications are that recreation visits to the National Forest lands along the Teton Pass Corridor will increase in conjunction with population and housing trends.
- The multimodal transit stops west of Coal Creek need further consideration. To serve the community and reduce vehicle congestion along the corridor please consider Kotler Ice Arena as an additional transit option.
- Providing alternative transportation options to low occupancy vehicles is supported by Victor, Driggs, Teton, and County Plans.

#### **Feedback Form Question 5 – Considered Capital Improvements:**

- The scope of the draft Study's corridor does not align with the recommended capital improvement scenario locations. No capital improvements are proposed in Idaho or along Idaho Highway 33. All capital improvements considered in the draft Study are east of the Idaho/Wyoming state line along Wyoming Highway 22.
- To improve transportation safety wildlife crossing structures should be incorporated throughout the corridor. The draft Study does not demonstrate any wildlife crossing structures from the state line west along Idaho Highway 33.
- The draft study includes wildlife vehicle collision (WVC) data in Wyoming but omits any consideration of WVC's in the Idaho portion of the corridor. WVC data has been provided by the Jackson Hole Wildlife Foundation (JHWF). JHWF maintains WVC datasets for Idaho. Has FHWA considered WVC data provided by ITD, Idaho State Police or Idaho Department of Fish and Game (IDFG)? Arguably, from anecdotal observation by Corridor travelers, the Idaho Highway 33 section from the state line to within a mile east of Victor, Idaho has even more WVCs than the Wyoming Highway 22 section mentioned above. Is Idaho Highway 33 considered a "hotspot" for wildlife vehicle collisions?
- Wildlife Crossing Structures have been proven to be effective in providing safe transportation, reducing wildlife mortality, and maintaining wildlife migrations and



population connectivity. The draft Study proposes wildlife crossing structures and associated fencing starting at the Coal Creek trailhead and end at the state line. Has ITD or IDFG modeled what influence improvements on that Wyoming section will have on wildlife populations or any associated increase or decrease in WVCs on the Idaho Highway 33 section of the Corridor? Have these Idaho Department's considered the value of WVC reduction on this heavily traveled state highway section?

**Feedback Form Question 6 – An Important Additional Consideration:**

- Victor, Driggs, Teton and Teton County, Idaho would like to highlight our strong concern about provisions in the project that appear to be in contradiction with efforts to reduce WVCs on Idaho Highway 33. We are concerned that creation of a higher speed passing lane in the Idaho Highway 33 section of the Teton Pass Corridor southeast of Victor will detrimentally counteract efforts to reduce WVCs. While we do not wish to compromise Teton Mobility Corridor Improvements Build Grant Project funding for improvements in the Teton Pass Corridor, we strongly suggest creating slow traffic pull out areas, turn lanes for highly used areas, as well as WVC mitigation in the road section where the passing lane concept is being considered

On behalf of the residents and visitors of Victor, Driggs, Teton, and Teton County, Idaho we appreciate all of the Capital and Operational considerations contained in the draft Teton Pass Corridor Study. However, we remain concerned that much of the focus of the study lies east of the state line in Wyoming. Idaho Highway 33 and Wyoming Highway 22 are the physical linkage for our closely tied communities. It is imperative that respective governments and agencies in Idaho participate in this study and future developments that have both safety and economic implications for our residents and visitors alike.

Sincerely,

Cindy Riegel, Chair  
Teton County, Idaho Board of County Commissioners

Bob Heneage, Commissioner  
Teton County, Idaho Board of County Commissioners

Michael Whitfield, Commissioner  
Teton County, Idaho Board of County Commissioners



Brent Schindler, Mayor  
City of Teton, Idaho

August Christensen, Mayor  
City of Driggs, Idaho

Will Frohlich, Mayor  
City of Victor, Idaho

CC:

Luther Propst, Chair, Teton County, Wyoming Board of County Commissioners

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