



July 18, 2008

Jackson/Teton County Comprehensive Plan Planning Team  
c/o Alex Norton, Project Manager  
cc: Town Council, Board of County Commissioners, Town & County Planning Commissions  
Re: Comments on the June 2008 Preferred Plan Themes & Policies Draft & Land Use Plan Maps

Dear Planning Team,

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to comment on the draft "Themes and Policies." We believe that this Plan should be guided by a strategic and comprehensive conservation planning approach – one that recognizes that all development must take place within the context of Jackson Hole as a unique gateway community to two premier national parks and one of the last relatively intact ecosystems in North America. Our comments on this draft should be understood in that vein – *we believe that a place as unparalleled as Jackson Hole needs an unparalleled and unique planning approach.*

Our comments are organized as follows:

- 7 - comment summaries on Themes 1-7
- 7 – sections on Themes 1-7, which includes the text of the draft document with our comments incorporated within draft language. (We have highlighted sections in yellow and provided comments in green italicized print.) Some comments recommend specific language, and some simply raise concerns about the need for clarification or elaboration on a particular idea.

Given the rough draft form of this document, we primarily focused on "big picture" concerns. As the critical pieces of the overall Plan become more closely integrated and aligned (Future Land Use Plan Maps, "Themes and Policies," and the Introduction [not yet released]), we will provide more specific comments. In some cases, it was difficult to make targeted, constructive comments regarding specific language because it was unclear what was being discussed or proposed. For example, what are "natural resource priority areas" and how might they differ from the Natural Resources Overlay?

We appreciate the work that has gone into this draft; there are definitely some positive elements. However, these elements need to be better framed and described in light of one another, and they should be based on an understanding of capacities, thresholds and conflicting priorities. We also believe that significant changes need to be made in order for the document to have a strong, comprehensible foundation. By our analysis, the Plan is not currently written in a way that enhances predictability or that enhances understanding of how community priorities should be addressed in an integrated way. Specifically, the "Linking Themes" chapter does not yet do this, nor does it sufficiently describe the concept of sustainability in terms of our unique context. It is also unclear how this chapter will be incorporated as part of the Plan and how it will relate to the "Introduction," which is not yet released. Given that the "Introduction" may link themes in greater detail, we will provide comments when that chapter is released.

We recognize that many "details" will be addressed in the writing of land development regulations, but we still feel that a certain level of detail is critical for the Comprehensive Plan process, particularly given the Plan's objective to increase predictability. Without a strong, clear Comprehensive Plan, we fear future land-use planning will not be directed in a way that will protect the rare and irreplaceable elements of our community and surrounding ecosystem.

In a nutshell, *we believe that this document fails to adequately acknowledge and define how rare and irreplaceable some of our assets are - and importantly - all the factors that contribute to our ability to protect, or lose, these assets.* Broadly speaking, we ask that this next stage of the process take a much closer look at what sustainability should mean for Jackson Hole. A key aspect of sustainability is the recognition of capacity, limitations and thresholds. To be sustainable, we must be willing to acknowledge the very real limitations in meeting different community goals.

More specifically, we would like to see this Plan address planning issues more comprehensively. First, in order to achieve what this Plan directs, the Town and County must approach land-use decisions in a concerted way. This component is critical; the Plan's framework and outcomes are entirely based on strong intergovernmental coordination and it is unclear to what extent this is happening. Second, the Plan needs to emphasize the importance of growing at a responsible rate in terms of both residential and commercial development. Slower rates of growth allow us to learn from land-use decisions and make modifications accordingly. Third, development patterns should be configured to protect wildlife, ecological functions and a high quality of life. (This Plan does a good job of outlining why a minimized development footprint is important for wildlife. However, the Future Land Use Plan Maps need significant refinement and clarity to determine to what extent the footprint will be lessened, and whether the footprint is configured in a way to protect ecologically valuable areas.) Fourth, this Plan should respond to the community support for an overall reduced development potential. In general, densities and scales of development apt to sustaining community character and the overall integrity of the underlying ecosystem should be integrated in this Plan. (The Conservation Alliance is in the process of preparing a memo regarding the Planning Team's position on community support for limited growth potential.)

To conclude, we appreciate the work that has gone into this process. We also recognize how important this process is for the future of Jackson Hole. Just as the planning team has stated, we also want a strong, more predictable plan that is based on asking and answering the tough questions now so that our community doesn't have to address them on a development-by-development basis in the future. We urge you to take our comments with this in mind.

We believe our valley's character is built on the common understanding that our cherished natural resources are of the highest importance to Jackson Hole and the surrounding Greater Yellowstone Ecosystem. We also believe that natural resource protection can best be accomplished when citizens become informed and actively involved. Given these beliefs, we will continue to be actively engaged in this process and look forward to the next phases of public involvement.

Thank you and please contact us anytime at 733-9417.

Sincerely,

Franz Camenzind  
Executive Director

Kristy Bruner  
Community Planning Director