

TO: Alex Norton
FROM: Kristy Bruner, Community Planning Director, Jackson Hole Conservation Alliance
DATE: 5/22/08
RE: Preliminary Comments on the Preferred Plan Themes & Policies Outline

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to comment on the recently presented outline of themes and policies. At this point, we would like to make a few preliminary, broad comments prior to the release of the full draft Plan. Upon review of the full draft, we will make more specific comments.

Overall, while recognizing that we are still in a “preliminary” stage, we think this last round of meetings did not adequately present a plan that truly reflects a comprehensive public opinion or strong planning principles. While the draft policies and preferred land use plan include many positive elements, we believe they have missed the mark on several fundamental issues. That said, we recognize that this part of the process can be quite difficult for all involved, as the discussion is transitioning from broad concepts to detailed “lines on the map” and specific policies. This transition is understandably challenging. In general, many of the “big picture” ideas are mentioned, but are not necessarily reflected in the elements of the Plan. Without detailed elements laid out, it is challenging to evaluate even a range of consequences that would result from the preferred plan and policies.

Below, we will summarize key areas of concern:

- ***Evaluations of real consequences of proposed scenarios have been inadequate or absent***
In a nutshell, the “plan” appears to have resulted from analysis on development patterns only, rather than a comprehensive analysis of overall intensity of development and all its associated consequences. Consequences include wildlife population viability, traffic capacity, fiscal impacts, character preservation, etc. It appears that much of the plan simply shifts density, at high levels, to *primarily* South Park and Town. Of concern are repeated assumptions about “tradeoffs” that have been inadequately explained and inappropriately assumed. For example, it has been stated that the “Plan” will succeed in protecting wildlife through development **patterns**, which at the general concept level has merit. Development should be patterned in a way that protects functional open space and habitat. However, given the seemingly high densities proposed in “development areas”, the impacts of **overall intensity and extent of development (i.e., build-out)** on wildlife populations throughout the valley appear to have not been considered in a meaningful way.
- ***Identification of “Conservation Areas” appears to underestimate, and exclude, important areas for wildlife***
Currently, the Plan proposes to focus conservation efforts in Buffalo Valley, Kelly and Alta. While this is a positive element, it seems to ignore, or underweight, the distinct ecological function of other parts of the valley, including the Snake River corridor and lower elevation areas. It is unclear what level of protection is being proposed for these other areas, and whether or not the NRO will be modified to have more teeth. Back to concerns with overall density, there are currently areas in the heart of the valley that are developed, but are developed at an intensity that enables use by wildlife. If density is allowed to increase in these areas, the landscape may no longer be permeable for wildlife, which could have major repercussions on populations.

Additionally, it is critical to recognize that as development patterns and intensities change

throughout the valley, wildlife use in areas will also change. Areas that are not currently considered “critical habitat” or “natural resource areas” may become more important through time as wildlife are displaced from other areas, as overall connectivity is degraded, and even as vegetation types shift as a likely result of climate change.

Even though “stewardship of wildlife habitat and other environmentally sensitive areas and resources” is listed as a major theme, it is unclear to what extent policies will be able to support achieving these goals. For example, in the outline, there appears to be no mention of commitment to monitoring natural resources, which would need to be a key component of effective stewardship.

- ***Alternative fails to include a sufficient consideration of build-out numbers and population capacity***

Planners didn’t provide a clear picture of build-out, nor emphasize the importance of analyzing issues of population capacity. There needs to be a venue for discussing how many dwelling units are appropriate for the valley. Throughout the process, both elected officials and the public have voiced the need to look at alternatives under different build-out scenarios (and their consequences on traffic, wildlife, etc.). To date it has not occurred. When will this occur? It is clear that a majority of residents want limited population growth, but the alternative doesn’t reflect this and certainly doesn’t provide a means of achieving such a goal.

- ***Policies appear to fail to address the high level of commercial potential and associated consequences***

In addition to employee generation within planned resorts, the plan still contains a high level of additional commercial potential. Given the issue of affordable housing, and our increasing backlog, there should be greater focus on reducing the demand for affordable housing. Reduced commercial potential (or shifting zoning from commercial to residential potential) is a direct and effective way to curb this demand for housing. The extensive area proposed to be “mixed-use” in Town is a concern. The concept appears to be misapplied by elevating increased commercial potential in districts where it is not appropriate.

“Mixed-use” can take many different forms at the detailed level. What is critical is the **proportion** of uses with these proposed districts. For example, “mixed use” in many areas simply signifies that an **area or neighborhood** has a certain degree of mixed-use. However, based on the mixed-use categories proposed in Town, it appears that “mixed-use” is defined at the level of **individual structures or developments**. This appears to translate into significant growth in commercial and office space. In this case, these details must be transparent for an adequate evaluation. Varying proportions of mixed-use will have radically different effects; therefore any thorough evaluation of the Plan must consider the details. “Mixed-use”, and all the ranges of meaning the concept can carry for different individuals, should be clarified. Without careful consideration and discussion of the details during the Comp Plan update process, we as community will fall short in making the Plan more predictable.

- ***Alternative presents high densities, but with minimal guidelines for proportions of housing categories (workforce versus market)***

Of particular concern are the proposed densities without specific guidelines for housing types. For example, it seems that many individuals that support higher density support it for the cause/benefit of workforce housing, not for the sake of density alone. However, at this point, it appears that elected officials, in particular of the Town, are lagging behind in enabling growth to adequately contribute to securing housing for the workforce.

- ***Policies do not address the effect of cumulative impacts of development***

In order to protect wildlife habitat, natural systems, etc. at a *functional* level, a means for addressing cumulative effects is essential. Our community could protect certain areas of open space (i.e., at a structural level), but fail overall to protect the ecological function of the valley.

Additionally, principles such as “improve air quality” need to be specifically defined. Is the goal to improve air quality per capita, or at a broader community level? If it is to maintain quality overall, then certainly the extent of allowable development will affect that goal, even if multi-modal transportation systems are in place.

- ***If a “predictable level of build-out” is to be achieved, inconsistent policies (such as discretionary incentives and regulatory measures) have to be better defined.***

In conclusion, many elements of the preferred plan are positive, and we appreciate the work that has gone into the process to-date. We also recognize that the current transition from “big ideas” to “specifics” is challenging. That said, the preferred plan failed to address issues of capacity for development, and the linkages between “allowable development” and actual consequences. In general, the plan appears to accommodate high population growth (based on density options and not baseline zoning) without a strong analysis of how this population level will influence the community’s consistently voiced top two priorities: protecting wildlife and managing growth responsibly. The plan could work to exacerbate community challenges by enabling drastically increased densities, without having a plan to “fix” and mitigate the effects of development that has already occurred, or that is in the “pipeline”. *This plan cannot be just a question of where development should be directed; it must also be a question of capacity (how much) and of what type (character and function). To date, the question of appropriate quantity, which is a very important one, appears to be underemphasized throughout most of the major themes presented.* In general, the big idea of “reduced development potential” should be stronger in the major themes, guiding principles and policies. Not only will this reflect public opinion, but it also makes sense from a planning perspective. If Jackson Hole is to achieve its goal to be a stewardship-based gateway community to a global treasure, it must address the consequences that human population growth can have on both the private and public lands of Jackson Hole.

Thanks for your time. We look forward to continued discussion on the details, as one of our main hopes for this Plan is increased predictability. Without careful consideration of the details during the Comp Plan update process, we will fall short in making the Plan more predictable.

THANKS FOR YOUR WORK!!!