



May 15, 2009

Jackson/Teton County Planning Team: Jeff Daughtery, Tyler Sinclair, Alex Norton, Jeff Noffsinger
cc: Town of Jackson and Teton County Planning Commissions
Mayor and Town Councilors, and Board of County Commissioners

Dear planning team, appointed commissioners, and elected officials,

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to comment on the April 2009 draft of the Jackson/Teton County Comprehensive Plan. Given the limited timeframe of the first phase of the public comment period, and the extent to which the April 2009 draft represents a rewrite, rather than an update to our community's current 1994 plan, this initial correspondence will only include a brief, broad summary of our preliminary analysis. **Prior to the beginning of planning commission hearings, the Conservation Alliance will submit additional, detailed comments specific to each chapter, theme, and future land use plan.**

The Conservation Alliance has major concerns with the draft released in April 2009 and believes that the draft, as currently written, is fundamentally off-track. Not only does the draft not represent the vision of the community in fundamental ways, but it also omits a number of important principles and policies that could positively direct long-term, strategic planning in Jackson Hole. In general, the plan has a number of vague and contradictory policies that raise more questions than they answer. There are also significant discrepancies between policy themes and the draft's planning tool – the “future land use plan” – particularly in light of the amount of development the maps propose and where.

Our community has a long history of dedication and commitment to protecting the values of Jackson Hole that make it world renowned – its wildlife, open spaces, scenery, recreational opportunities and small mountain town character. Our community has long recognized that in order to protect these values we must take a unique approach to planning for development and conservation. As a result, a core objective of our current 1994 Plan is to protect rural character (low-density characteristics) throughout the valley. The 1994 Plan also emphasizes the importance of permanent protection of open space as development occurs. The new draft steps away from this underlying, basic foundation. The new draft identifies permanent protection of open space as a potential step, but doesn't provide substantial enough language to require it. Also, unlike the current plan, the new draft fails to address the range of community benefits that result from permanent protection, such as the elimination of anticipated transportation demand. If we move forward with the adoption of the draft that was put forward in April 2009, we could take a major step backwards in terms of promoting *long-term stewardship* of the rare assets that define Jackson Hole.

While the plan includes some positive elements, including some of its concepts outlined in the vision chapter, the bulk of the document, including the future land use plan, falls far short. For example, we appreciate the new draft's intentions to shift development patterns into increasingly confined footprints. However, it misses the mark on other important aspects of planning and wildlife protection – such as the intensity, rate, and type of overall growth regardless of where it occurs. **Overall growth potential in this plan should be reduced.**

The new draft lacks a systematic framework through which land use decisions can be approached in an integrated way. The original objective to increase cohesion among different themes was not achieved. Also, the new draft appears to lack a science-based understanding of the different community issues it seeks to address, ranging from habitat conservation to workforce housing. At a basic level, planning is a form of problem solving. Unfortunately, the draft doesn't bring forward comprehensive solution-oriented policies to address some of our community's most challenging and pressing issues. As an example, our community will not lessen our workforce housing shortage if we continue to facilitate the extent of commercial development

called for and deemed reasonable in the new draft. These contradictory elements are unacceptable, particularly given the incredible extent to which the public will be called to support the achievement of other workforce housing policy objectives.

As we move forward, we recognize the Comp Plan is an initial step in what will likely be a much longer process – the revision of our land development regulations. We recognize that the land development regulations will enable a more detailed discussion on some of the issues. However, given the role of the Comp Plan as a guiding vision document for the drafting of land development regulations, getting this first step right is critical. We have major concerns with the disconnect between the degree of geographic specificity (and development characterizations) outlined in the future land use plans and a lack of analysis of what is proposed. It is troubling that the new draft maps send the message that certain levels of development are appropriate without any accompanying analysis of impacts. In general, the manner in which the future land use plans are organized is not user-friendly or clear, leaving the door open to unpredictable future land use planning. Overall, this new draft does not simply encompass a “big picture” community vision and therefore should not be reviewed as such.

We question the approach to prioritize themes in individual, isolated land use planning districts. This type of approach could lead to planning and decision-making that underemphasizes the importance of cumulative, valley-wide impacts. The new plan should include a more comprehensive framework to evaluate all land-use decisions.

In July 2008, the Conservation Alliance submitted extensive comments outlining our concerns and recommended strategies for how the “updated” comp plan could be reworked to better uphold the will of the community. Many of these concerns and recommendations we brought forward still hold, and we will reiterate them again in future comments. And, as we have stated before, based on the community’s consistently voiced top priority, theme one should be the foundation of this plan, rather than an isolated theme. In Teton County, strategic conservation of the county’s unparalleled wildlife, open spaces, and scenery needs to be the organizing theme of land-use planning decisions.

In closing, we will continue to voice, on behalf of documented community will and our irreplaceable wildlife, the new draft must be fundamentally changed so that it will effectively be able to protect the larger role that Jackson Hole plays in this ecosystem and for many around the world. The Greater Yellowstone Ecosystem, and our community, which places stewardship of the ecosystem as its top priority, deserves no less.

Please see the attached publication and contact us with any questions.

Sincerely,



Franz Camenzind
Executive Director



Kristy Bruner
Community Planning Director