



December 9, 2009

Town of Jackson and Teton County Planning Commissions

Re: Theme 3 Comments

Submitted via email to Alex Norton and at Dec. 9 Joint Planning Commission Meeting

cc: Town of Jackson Planning Staff: Tyler Sinclair and Jeff Noffsinger

Dear Planning Commissioners,

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. Following are comments specific to Theme Three - "Uphold Jackson as 'Heart of the Region.'"

Similar to our review of previous chapters, attached is an analysis of Theme Three that identifies specific sections of the chapter that could benefit from additional clarification. In addition to comments calling for additional explanation on certain language, we have provided specific recommended actions to improve the chapter. While we appreciate the desire to stay at the broader level during the review, an analysis of land use issues in town requires particular attention to the details, including the amount, geographic scope, design, and type of proposed development. **In upcoming hearings, the discussion should extend beyond town as an appropriate location for development to one that seriously considers the conditions that actually make additional development in town "smart growth."**

Throughout this process, which is now in its third year, we have consistently expressed the need for this planning process to more specifically address the issue of character preservation as it relates to town redevelopment. To do so would improve and build upon the existing 1994 Plan, which was the original objective of the process. While such a task (defining community character) may seem daunting, it must be an essential component of this new plan. Again, the 1994 Plan provides a great starting point for refining a definition in terms of the built environment versus the natural environment. This expectation is not solely our own; Clarion Associates made the following statement in an October 2007 report: **"The goal of preserving community character has not been reconciled with the pressures for redevelopment; this is a topic that will be more closely addressed in the [update]."**

At the broad level, the Conservation Alliance, along with the majority of the public, strongly believes that this plan must not increase the overall growth potential in the valley. Without additional "upzones" there are already high levels of potential development (beyond what is seen on the ground today) that are in the pipeline. This valley ultimately has a carrying capacity beyond which its unparalleled and irreplaceable resources will be lost. This recognition must be front-and-center as you discuss growth-related policies in the Town of Jackson.

Thank you again for all your work on these very difficult and complex issues that face our community

Sincerely,

Kristy Bruner
Community Planning Director

Becky Tillson
Community Planning Associate

Uphold Jackson as “Heart of the Region” (Theme 3)

Statement of Ideal

Residents and visitors will continue to rely on Jackson as the center of the community and primary location for jobs, housing, shopping, educational, and cultural activities.

What does this Theme address:¹

- 3.1 - Town of Jackson as the population center of the region*
- 3.2 - Vital retail/mixed-use core in Jackson*
- 3.3 - Healthy Residential Districts*
- 3.4 - Targeted Residential Growth within town mixed-use districts*
- 3.5 - Civic spaces and social functions*
- 3.6 - Historic structures and sites*

“As the sole municipality, Jackson is the commercial hub where people live, work, and play.”

Why is this theme addressed?



Jackson is the retail, civic, housing, and cultural hub of the region.

The concept of Jackson as the “heart of the region” recognizes and plans for the concentration of development, particularly workforce housing and commercial services, within the Town of Jackson. Maintaining town as the nucleus of the region is a major theme of this Plan, and steering development into the town helps implement many other themes of this Plan. For instance, it helps reduce vehicle trips

and conserve natural areas and wildlife habitat in the region².

The “heart” idea is also an emotional, cultural, and values-driven concept that refers to the role that the town plays as the region’s central gathering place. However, it is also crucial that the character and charm of Jackson be protected and enhanced, for they too maintain the heart of the region concept. Future development in town must be sensitive to maintaining our community character as a small town with a distinct heritage and legacy that is linked to our connection with the surrounding natural environment³.

Jackson as Population Center

Jackson always has been the population center, even as Teton County’s population and smaller communities grew outward from town. Approximately 48% of the County’s population is located within the two square miles of town. This concentration of people creates exciting opportunities including a vibrant downtown; enjoyable neighborhoods in which to live, work and play; accessible retail and service amenities; and abundant recreational activities. Directing future town-level development into the Town of Jackson and other identified areas in the county maintains Jackson as the population hub and prevents a sprawling pattern⁴ of development that degrades natural resources and wildlife habitat.

Jackson as Retail Center

Jackson has also historically been the retail and business center of the region. Most of the county’s shopping opportunities and jobs are located in a centralized, compact area. The community relies on sales tax revenue generated in the Town of Jackson as a significant portion of local government funding. A large part of the economic strength and “heart” of the town is tied to preserving the unique Town Square and character of the surrounding buildings⁵.

Jackson as Cultural and Social Hub

The Town of Jackson has long served as the cultural and social hub for the region and Teton County. It is the primary location for municipal and county governments as well as regional headquarters for many state and federal agencies. It is also a major tourist destination and a “gateway” to the national parks and Bridger-Teton National Forest.

Jackson with Stable Neighborhoods

Jackson residents value their stable neighborhoods and are concerned about seeing too much change too quickly. Areas of town will redevelop and infill over time, but many neighborhoods will remain stable in scale, image, and uses over the long-term. The preservation of existing neighborhoods will help maintain an existing inventory of workforce housing and keep workers near the region’s major employment center while maintaining the unique character of many areas of the community.

Jackson as Historic Preservation Heart

Jackson Hole has a great opportunity to promote historic preservation through heritage tourism and to share the colorful western history of the community with community members and guests. Historic preservation as a local, state, and national movement has matured over the past few decades and has proven to be a sound economic development strategy in addition to conserving resources.

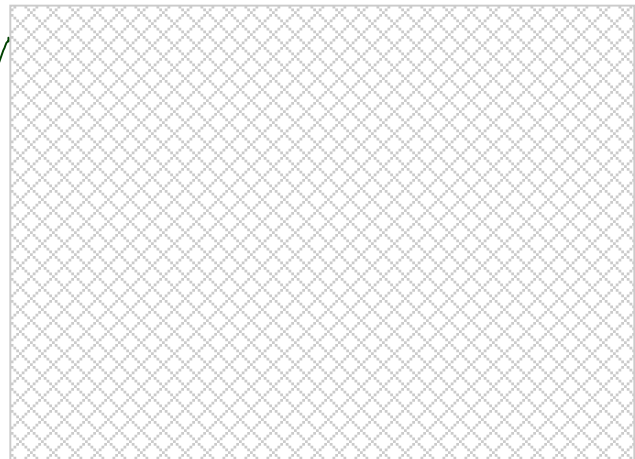


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What the community has said about this theme⁶

During the Comprehensive Plan update public outreach effort, the community expressed a desire to maintain the Town of Jackson as the “Heart of the Region,” although a variety of opinions emerged regarding the meaning of this phrase. It is clear that the community identifies with the Town of Jackson as the civic, retail, cultural, and emotional hub of the region and that future changes to the town in all areas should be handled carefully. In addition, the public feels strongly about the sense of community created by the compact physical town design and layout. In addition, throughout the planning process, the community strongly expressed their support for the concept of a strong town core⁷.

2008 Polling indicated that:

- Most of the community agrees with limiting development in the county rural and resource areas while increasing development in the Town of Jackson.
- A large majority agrees with promoting long-term redevelopment of the “Y” area by improving the road network, making it pedestrian oriented, and providing incentives for additional workforce housing⁸.
- Most of the community supports limiting building heights to three stories along major corridors outside of Town Square⁹.
- A majority of the community agrees it is appropriate to keep home and lot sizes stable in existing single-family neighborhoods in Jackson to preserve neighborhood character.

Principles and Policies

Principle 3.1—Maintain the Town of Jackson as the population center of the region

Jackson has historically served as the primary population center of the Valley, around which other small communities have evolved. One of the core ideas of this Plan is to direct future town-level development into the Town of Jackson, in a way that is compatible and that enhances the town and creates a variety of housing types.

Policy 3.1.a: Promote mixed-use redevelopment in designated districts within Jackson

A principal land use tool supported by this Plan will be to promote mixed-use neighborhoods in appropriate locations throughout the town¹⁰. To be successful, these neighborhoods should generally include provisions for: municipal utilities (water, sewer and storm sewer), schools, complete streets including transit, local commercial services, a variety of housing types, recreational amenities, and other facilities and uses as appropriate.

development of town into targeted areas while preserving its physical and social character desired. They will also establish a targeted vision when appropriate.¹¹

Policy 3.1.b: Redevelopment and infill should enhance Jackson as an enjoyable place to live

The Town of Jackson contains many pleasant neighborhoods and living opportunities, and future development should reinforce and create new vital neighborhoods within the town. Design guidelines and neighborhood plans will steer the physical

Policy 3.1.c: Emphasize a variety of housing types, including deed-restricted housing¹²

The town currently has the greatest diversity of housing and the most workforce housing in the county. As the regional population center, maintaining this diversity of housing types and styles (single family homes, duplexes, condos, carriage homes, lofts, and apartments), including deed restricted housing of all types is critical to accommodate a diversity of households.



This Plan supports a variety of housing types, including deed restricted.

Principle 3.2—The Town of Jackson will continue to be the regional hub for retail and lodging development in the county

Jackson has historically been the retail and business center of the region with a majority of the shopping opportunities and local jobs. The town will continue to be the center for community-wide services for residents and visitors. The downtown and Town Square are major draws and need the highest level of design guidelines for future development.

Policy 3.2.a: Protect the image and function of Town Square

Town Square is Jackson’s major tourism draw and visitor retail center. It is also the area that evokes the greatest amount of sentiment and concern over architecture, scale, and community character. The town square area will have the highest level of design standards to guide future development and preservation efforts.

Policy 3.2.b: Promote a balanced mix of uses including commercial throughout Jackson

The community will continue to support Jackson as the retail center with a variety of mixed-use and commercial districts. The town is vitally important for civic functions, retail, commerce, lodging, and housing. The town will seek to maintain a balance between visitor amenities and an appropriate amount of community benefit received from redevelopment in the future in all commercial districts¹³, including Southern Highway 89, Central Business District, South Cache and Snow King Corridor, and Snow King Resort.

Policy 3.2.c: Maintain downtown Jackson as the retail center of the region

Downtown Jackson is not only the emotional center of the community but also functions as the community’s economic center. The sales tax revenue generated in this area is essential to the funding of most public and community services and functions and will need to be maintained or expanded in the future¹⁴.

Policy 3.2.d: Maintain lodging as a key component in the downtown

A key element of the 1994 Comprehensive Plan was the establishment of the Lodging Overlay District. The purpose of the overlay was to concentrate lodging into the downtown where guests could access tourist-orientated amenities without a vehicle. In addition, the overlay was intended to protect the remainder of the community from expansion of tourist related amenities. The original intent of the overlay is supported in this Plan, but the boundary has been revised to reflect the desired future land use pattern¹⁵.

Principle 3.3—Foster healthy residential neighborhoods

The Town of Jackson residents value their neighborhoods and are concerned about seeing too much change too quickly. Many neighborhoods will remain stable in terms of their scale and image. Infill will be compatible in scale and use, particularly in the West Jackson, East Jackson, and Southern Hillside neighborhoods¹⁶.

Policy 3.3.a: Preserve stable neighborhood districts

The Town of Jackson will emphasize regulations that enhance and stabilize established neighborhood districts. Design standards and guidelines will direct infill and redevelopment projects and encourage housing diversity and rehabilitation. The Future Land Use Plan (FLUP) identifies stable districts as West Jackson, East Jackson, and the Southern Hillside.

Policy 3.3.b: Promote compatible infill that fits Jackson's neighborhoods

Infill should be compatible in scale and use with the existing neighborhoods and the Future Land Use Plan. Key considerations should include the identification of appropriate transitions between land uses and developments of varying intensities, and incorporation of roadway, park, open space, and trail/pedestrian connections that enhance the quality of neighborhood. In stable districts future development will mirror the existing development pattern.

Principle 3.4—Promote targeted residential growth within identified town growth districts

Future residential development into targeted areas in the community will help to efficiently achieve the identified community vision. The Future Land Use Plan identifies five targeted growth districts, including the Y, Karns Meadow, the Rodeo Grounds, the Southeast Mixed-Use neighborhood, and NoBro.

Policy 3.4.a: Encourage growth districts for residential growth

The districts identified for targeted residential growth currently contain or are in close proximity to all the amenities necessary to create a mixed-use neighborhood, including retail, civic, and social facilities, and parks and recreation. Additional residential density identified for the town above that allowed by the current zoning will occur in the targeted growth districts.¹⁷

Policy 3.4.b: Mixed-use districts will be guided by the Future Land Use Plan¹⁸

In districts targeted for residential growth, future development will be guided by the FLUP and to a lesser extent the existing development pattern. Key considerations should include the identification of appropriate transitions between land uses and developments of varying intensities. In some cases, neighborhood plans will be a means of providing a greater level of detail for specific areas than what this Plan can provide.

Principle 3.5—Recognize the importance of civic spaces and social functions as a part of maintaining a sense of community

Historically, the Town of Jackson has served as the cultural, social, and civic hub for the region and Teton County. Maintaining and enhancing public spaces and making strategic

investments, increases the important role of Jackson as the regional center for tourism, government offices, and as a gateway to the nation's parks and forests.

Policy 3.5.a: Maintain and improve public spaces

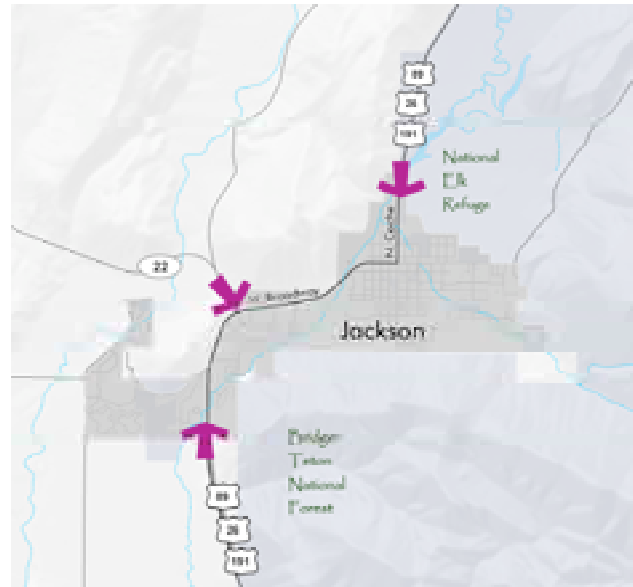
Public spaces are the building blocks of a thriving community. Jackson's public spaces and civic facilities should be interesting, memorable, and reinforce our sense of community. The town will continue to promote high quality design of public spaces, including creating attractive gateways, preserving views, and providing attractive public right-of-way amenities.¹⁹ New developments in the Town of Jackson should contribute to quality public spaces—including but not limited to sidewalks and walkways, parks, outdoor squares, and landscaped areas.

Policy 3.5.b: Make public investments in strategic locations²⁰

The community will continue to invest in public facilities such as government buildings, parks, recreation, trails, workforce housing, arts and cultural facilities, in locations in town that enhance the town as a civic and cultural hub. Specifically, public amenities should first be located in Downtown Jackson, second within the Town of Jackson limits, and third within greater Teton County. This priority is only intended for public facilities with the primary function of directly serving the public and not for ancillary or support facilities.

Policy 3.5.c: Enhance Jackson gateways²¹

The town gateways play a special role in setting the community tone and atmosphere for the millions of guests that visit the Town of Jackson every year. The town will work to enhance the three major gateways including upgrades to both the public realm and on private property.



Town of Jackson's three major gateways.

Policy 3.5.d: Continue traditions and community events

The community will continue to sponsor and support community events in the Jackson downtown that celebrate the unique character of the region and provide a strong sense of community to local residents.

Principle 3.6—Preserve historic structures and sites²²

Our community is proud of its history. Encouraging the preservation and awareness of historic structures and sites contributes to economic development, helps to conserve resources²³, and maintains our culture and awareness of history.

Policy 3.6.a: Identify and preserve historically-significant structures and sites

The community will establish and support existing local historic districts to meaningfully preserve historically-significant buildings and sites.

Policy 3.6.b: Support the Historic Preservation Board

The Teton County Historic Preservation Board (TCHPB) has several on-going programs that include identifying historic properties, and nominating the most significant structures for National Register designation. The county and town will continue to support the Historic Preservation Board in its efforts to document and preserve historic buildings and sites.

Policy 3.6.c: Enhance historic preservation education, outreach, and awareness

The Teton County Historic Preservation Board and the Jackson Hole Historical Society and Museum undertake many programs to inform the public about the community's historic features and history. The county and town will continue to support these and other organizations in their education efforts to advance awareness beyond current levels.



Identify and preserve historically-significant structures and sites

Strategies

The Town of Jackson, primarily, will undertake the following strategies in initial implementation of the policies of this theme. The town and county should periodically update strategies as tasks are completed or when additional action is necessary, based on monitoring of the Theme’s indicators.

Strategy 3.1: Amend Land Development Regulations (LDRs)

- Amend LDRs and zoning to be consistent with the Future Land Use Plan. This is the highest priority implementation strategy to ensure this Plan will be implemented.
- Complete an area plan for the Town Square district. The plan should include design standards and use descriptions.
- Initiate gateway plans for the three community entrances.
- Update the design guidelines to provide more specificity, and predictability.
- Amend PUD and PMD to be consistent with the Future Land Use Plan.

Strategy 3.2: Develop Neighborhood Plans

- Initiate neighborhood district plans for the targeted growth areas.

Strategy 3.3: Identify Criteria for Historic Buildings/Sites

- Define criteria to identify historic buildings and sites.

Indicators²⁴

The community will use the following indicators to monitor achievement of this theme’s values.

Jackson as “Heart of the Region” Indicators	Goal	Review Period
1. New dwelling units by district	Consistent with FLUP	1 yr
2. New nonresidential square footage by district	Consistent with FLUP	1 yr
3. Proportion of population in town to the unincorporated county and nodes	Consistent with FLUP	1 yr
4. Number of annual community events	monitor	1 yr
5. Number of historic buildings/sites identified	monitor	1 yr
6. Investment in civic and gateway projects	monitor	1 yr

Jackson Hole Conservation Alliance Comments

¹ **Recommended Action: Add a principle and associated policies to this chapter specific to ecological and wildlife-related issues in town.** (A possible title is: “Conserve ecological function of lands within and adjacent to town boundaries in order to protect the Greater Yellowstone Ecosystem.”) This addition would provide clearer direction on wildlife planning policies specific to town that are currently lacking in theme one. The policies should address town’s “interface” areas with adjacent public lands, ecologically sensitive and valuable riparian areas (Flat and Cache Creeks), and wildlife habitats, including south-facing slopes that function as crucial winter range. In general, the natural environment, including town’s unique topography and watersheds, is underemphasized in this chapter. **Transportation issues specific to Town, including wildlife-related issues, should also be addressed more specifically.**

Recommended Action: Further refine the definition of community character as it relates to town redevelopment. This chapter should fulfill one of the main objectives of the Comp Plan process – to reconcile the pressures for redevelopment with community character preservation. It falls far short. Even though a common criticism of the 1994 Plan was its failure to adequately define character, this new draft unfortunately steps further back in terms of clarity. It refers to the word “character,” but then fails to provide adequate definition. Significantly clearer guidance about “compatible” and “appropriate” bulk, scale, and intensity as it relates to community character in a small mountain town, quality of life for residents, and the visitor experience, needs to be included.

In general, this new draft, because it has less specificity regarding community character and less direction for appropriate resort and commercial development, in several ways it provides less direction for town-related planning issues than the 1994 Plan. For example, it provides no direction to place limits on building size (and why this is important) or to restrict specific types of commercial development.

² **Recommended Action: Clarify the extent to which additional development potential is proposed in town, and to what extent this addition represents additive growth (as opposed to substitutive growth) for the valley overall.** As outlined in our comments on theme 2, **the extent to which the last sentence of this paragraph would hold, lies in the details of the draft’s implementation.** First, if adding additional development potential to town without assurances that “natural areas and wildlife habitat in the region” are actually protected, implying such as tradeoff, as this sentence does, is misleading. Second, with regard to transportation effects, **the amount of growth targeted for town, particularly if it is additive growth, and not substitutive, could actually worsen traffic conditions overall, not “reduce vehicle trips.”** Also, **the extent to which vehicle trips can be reduced will be dependent on whether redevelopment includes high levels of residential housing that is truly affordable to the workforce.**

³ See point (1). Community character should be better defined in the new draft. This absence of definition raises again the question as to why this new draft did not more efficiently build upon the existing 1994 Plan. (See chapters 1, 3, and 6 from the 1994 Plan for a starting point.) If critical elements of character are not defined in the comprehensive plan, land development regulations will not be written to protect them. This is a major concern regarding future town redevelopment policies.

⁴ Based on preliminary votes in the theme two chapter review, sections of this chapter that refer to town-level development in “other identified areas in the county” should be edited. As we stated during that review, the town-level intensification of county “nodes”, coupled with extensive town development, could actually accelerate a sprawling development pattern in the valley overall. The original draft proposed extensive creation and expansion of county “centers,” which appears to be in conflict with the concept of “Town as Heart.” For example, the scenario description in community polling for “Town as Heart” was outlined as having “little or no focus on creating or expanding other County centers.”

⁵ More specific comments will be provided during the FLUP discussions. However, this plan should acknowledge the potential impacts of significantly increased development potential on the overall historic character of Jackson as a small mountain town. The 1994 Plan summarizes potential impacts of larger buildings on a small town, pedestrian friendly environment.

It is important to recognize that community concerns are not restricted to potential shifts in architectural style or aesthetics; concerns relate to the shift in bulk and scale of buildings and their associated impacts (potential traffic congestion, increased workforce housing shortages, higher maintenance costs associated with reduced sun exposure, etc.). Distinctions should be made between preferred architectural style and preferred scale in buildings.

⁶ **Recommended Action: Remove or correct summaries of community polling.** Caution should be taken in citing just several polling examples under the chapter's section "What the community has said about this theme." 2008 polling indicates other community input that is not reflected in this abbreviated list.

If the section is not removed, below are a couple examples that should be added:

- *The University of Wyoming, Teton County Community Survey 2008*, included the following "Key Findings" in a summary report:
 - "A far higher percentage (78%) of residents considers it a higher priority to build more deed restricted affordable housing than to allow additional commercial or resort development."
 - "Both overall development in rural parts of Teton County and redevelopment in the Town of Jackson should be limited." (61%)

⁷ Clarify these statements. The community has also expressed strong concern regarding a lost sense of community due to rapid growth and its associated impacts. The geographic scope of the "strong town core" should be described. Does it extend from the "Y" area to the Town Square?

⁸ Throughout the document, terminology regarding incentives should be consistent. (The Dec. 3 staff report included a list of questions that should help clarify standards for incentives.)

⁹ Based on a comprehensive review of the polling questions, "**most** of the community" is not necessarily representative of the breadth of results across surveys. For example, *the University of Wyoming* "Key Findings" report of the phone surveys stated: "There was nearly equal agreement among residents that, "Current building heights in town today should be maintained. No change," (40%), and, "Careful redevelopment outside of the town square should be allowed, with up to 3-storey buildings," (37%)."

Recommended Action: Language should be included that acknowledges the extent to which survey questions, as a whole, focused on asking the public about tradeoffs. For example, when the public was asked questions about whether, for example, 2 or 3 story buildings were preferred, they were also asked to rate a degree of agreement with phrases such as "Designate sensitive resource areas (such as habitat, floodplains, steep slopes) as areas with greatly reduced development potential from which density can be transferred to the Town of Jackson."

¹⁰ Specific comments regarding the FLUP will be provided during those discussions. It remains unclear the extent to which the new draft promotes mixed-use at the level of individual developments versus at the neighborhood scale. These are two very different concepts, and could result in far different outcomes. Language should be incorporated that specifies the intent.

¹¹ See point (1) regarding the need to define character.

¹² See point (8). Terminology should be consistent.

¹³ **Recommended Action:** Ensure that this new plan more clearly articulates “community benefit” in order to increase predictability in future decisions. Perhaps this articulation is appropriate in the “managing growth responsibly” chapter, where it can apply to both town and county land use decisions. - * During earlier discussions on the Introduction chapter, the importance of refining criteria for “community benefit” was discussed. When will this be revisited? The list, at a minimum, could include the top priorities.

¹⁴ **Recommended Action:** Ensure that contradictory statements regarding sales tax revenues are not included in the new plan. The language, “Maintained or expanded,” leaves the door open to broad interpretation. How does this sentence relate to policy 2.5.c “Do not make land use decisions for revenue purposes”?

¹⁵ **Recommended Action:** Before promoting regulatory changes to expand lodging potential within town boundaries, an analysis of effective population, as well as of shifts in lodging capacity, should be undertaken. In terms of “desired future land use pattern” as proposed in this draft, **what information was used as a basis to propose the expansion/shifting of the lodging overlay?**

¹⁶ This principle needs further clarification. For example, factors or variables that contribute to fostering “healthy residential neighborhoods” should be described. It would be helpful to clarify the community elements (such as quiet streets, greenspace, a lack of light pollution, and an absence of crime) that people value and don’t want to see degraded. It isn’t simply a matter of not wanting to “[see] too much change too quickly,” as this text suggests.

We fully recognize the benefits of infill development in some areas of town, but we also feel language should be added to describe the real planning challenges associated with increased development potential in these areas. They include, but are not limited to: potential increases in crime, elevated noise, diminished “dark skies”, reduced scenic views, gradual loss of a sense of a small town community, reduced potential for buildings to use the sun as a renewable resource, lowered air quality, traffic congestion, parking deficiencies, and fiscal impacts.

Also, it is unclear what “stable” means in some of these districts. For example, according to Appendix I, in the East Jackson district, a higher number of residential units is proposed above what is allowed by current zoning, but it is still proposed as a “stable” district.

¹⁷ **Recommended Action:** Language that identifies requirements/conditions for additional growth in town should be included. Similar to point (2), is this extra allowable density in “growth districts” permitted only in exchange for affordable housing units or permanent conservation in outlying areas?

¹⁸ **Recommended Action:** Language should be added to clarify that the community vision should guide the development of the FLUP, not the other way around. Only after a clear policy basis for the proposed FLUP is outlined should the FLUP guide future land use decisions.

¹⁹ Vague terms such as “attractive” and “high quality”, without additional defining criteria, do not provide increased clarity beyond the 1994 Plan.

²⁰ This language, in terms of “strategic locations” is vague. For example, this policy states that amenities should first be located in “Downtown Jackson.” The plan should clearly define the geographic boundaries of “downtown” versus “within Town of Jackson limits” to increase predictability.

²¹ **Recommended Action:** Language should be added to clarify the meaning of “enhance gateways”. The proposed language does not provide clear direction. As one example, does it suggest that gateways should have minimal or larger setback requirements? The 1994 Plan provided some specific examples to define “enhance” in different contexts, and the importance of these entry points given our function as a gateway community.

²² This principle, and accompanying policies were formerly listed under the “managing growth responsibly” theme. The intent of this policy, to promote “a sense of place” should be a broader goal in the plan, and include both the town and county.

²³ **Recommended Action:** To help meet the 10x10 goal, an additional policy to support reuse of existing structures should be added. The 2008 draft of the new Jackson/Teton County Comprehensive Plan included an additional policy (2.5d – “support reuse of existing structures as an alternative to redevelopment.” This policy has been removed from the new draft, and should be reinstated. Emphasis on retrofits should be included in the new plan.

²⁴ **Recommended Action:** First, better indicators need to be identified. Indicators should include measurable variables of concern to the community, such as percentage net gain or loss of affordable housing units. For example, if a primary goal of “Town as Heart” is to enable increased housing opportunities for the workforce close to the workplace, indicators should correspond to affordable housing loss, preservation and production within town boundaries. **Indicators should also include factors for measuring transportation efficiency, watershed protection, and wildlife habitat preservation in outlying areas, all of which are factors to measure the success of “Town as Heart” vision and policies.** Second, baseline conditions, as starting measurable points, should be included in the tables. For example, if the indicator is “number of annual community events”, the plan should have an initial column that provides the existing number of events. Third, “Consistent with FLUP” and “monitor” are not sufficient goals, and should be replaced with more measurable factors. (For example, we should not monitor for the goal of monitoring, and “Consistent with FLUP” is an unacceptable benchmark.)

The concept of “Town as Heart” is a planning approach that intends to implement broader and more comprehensive goals. This chapter should reflect this broader approach, and identify other indicators that evaluate how “Town as Heart” implementation strategies carry out county-wide goals.

