



The Jackson Hole Conservation Alliance's detailed written comments regarding the second draft of the Jackson/Teton County Comprehensive Plan (released in April 2009) are all available via: <http://www.jhalliance.org/library.htm#comments>.

The following document includes our verbal comments made in late 2009 during the joint town/county planning commission hearings regarding Theme Three, "Uphold Jackson as Heart of the Region."

Re: Theme One Rewrite and Preliminary Theme Three Discussions

Below are the comments Kristy Bruner, Community Planning Director, verbally presented at the December 3 Hearing.

Just wanted to provide a few brief comments, and say thanks to those of you who came to one of Michael Kinsley's presentations. As you know, throughout the lengthy review of Theme One, we made a number of specific, line-by-line suggestions as to how to clarify and strengthen the chapter's policies. We won't reiterate them again, but I'd just like to state that while we feel a number of issues have been improved, concerns still exist, particularly given the split votes last meeting. In general, we still strongly feel that the policies in this chapter need to be backed more by the best available science and data. I'll just provide one example of this. In July we raised concerns about policy 1.1 c that includes a general statement that private efforts have successfully protected strategic lands that protect connectivity between crucial areas and enable migration. *Some* lands have been protected, but to our knowledge, there are a number of strategic lands that have **not** been permanently protected. In the latest round of public comment on the rewritten version of Theme One, a park ecologist raised the same concern about this statement. While these types of clarifications or changes may appear little, we feel that at the end of the day, the new plan the community ultimately adopts should contain the most accurate information on all levels, broad and detailed.

If you at this point are not going to direct line-by-line changes to be made, because you want to stay at a broader level, will there be a time, prior to sending the draft on to elected officials, when these details will be reviewed? Also, some of the possible discussion points listed by staff in your staff report, such as point one regarding responsible use of public lands, could better be addressed if these recommendations from other agencies, such as Wyoming Game and Fish, were noted and accessible in your discussions. As we stated at the September 10 hearing, the agency's comments on dispersed recreation could be specifically integrated into the policy to increase clarity. Overall, we hope that prior to the final review, some of the detailed recommendations brought forward by organizations, agencies and citizens in this process can be better incorporated.

As for Theme Three, we will submit detailed comments on this chapter prior to your next meeting, but since you may discuss the broad level issues tonight, I'll mention a few. Staff did a good job raising fundamental, broad level questions. In general, the Conservation Alliance believes the following issues are critical, as a starting point, to consider in your review of this chapter.

- Further refining the definition of community character as it relates to overall bulk and scale, not simply architecture -- if we don't adequately define what we are trying to protect in the town, in the long run, it won't be protected. Other terms/goals such as "enhance gateways" need additional clarification as well.
- Further clarifying the extent to which additional development potential in town represents additive growth for the valley overall, rather than substitutive growth (are the tradeoffs there to receive density from outlying areas in important habitat and scenic areas?, etc.) As we have stated before, we believe that the overall amount of growth, in addition to the location of growth, is a critical point to discuss.
- Further defining and addressing potential planning challenges associated with significant increases in density in town, and how it relates to the valley overall (in terms of commuting rates, traffic, parking, road expansions, crime rates, elevated noise, light, and air pollution, reduced scenic views, incremental loss of a sense of a small town community, etc.) While, for example, we fully recognize the many potential benefits of increased density in town, such as bringing more workers close to the workplace, we believe the plan must also be more realistic about other potential costs to ensure that policies are written into the plan that acknowledge these costs. In general, as you discuss town, always consider how recommendations will also affect Theme Two to ensure town redevelopment is not considered in a vacuum.
- Discuss the potential of adding a specific principle or policy that addresses the unique wildlife and natural resources, and associated planning issues, of the town. More detail could be provided here that does not currently exist in Theme One.

Thanks.



Re: Theme Three Discussions

Below are the comments Kristy Bruner, Community Planning Director, verbally presented at the December 9 Hearing.

Tonight, we have submitted our written comments in hard copy form for your review prior to additional hearings scheduled for Theme Three.

A few comments - While we appreciate that you need to stay at the broad level, your discussions on Theme Three must 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." This truly requires looking at the details – the amount, geographic scope, design and type of proposed development. This may be done in some form when the FLUP maps are put back on the table, but some of these details need to be put in the policy chapter.

In the Dec. 3 staff report, staff raised a good set of suggested questions for discussion that could help provide more clarity in this chapter. Without greater specificity on the preferred types of development, as well as clearly articulated conditions for permitting additional growth in town, there are no assurances that this chapter will actually guide "smart growth."

Below are a few key points for consideration as you address some of staff's questions:

- (Staff Question 1) The statement of ideal should incorporate language that emphasizes not only the economic and social goals of "Town as Heart" but also the ecological and natural resource protection goals (such as a confined development footprint).
- (Staff Question 2) Further efforts should be made to define small town character in the chapter itself. (The 1994 Plan is a good starting point; it has examples including preferred building scales and descriptions of the preferred environment (such as quiet streets and distinct opportunities for social interaction).
- (Staff Question 3) In terms of mixed-use, it is critical to closely look at the balance of residential and commercial development throughout town districts. Integration of certain "local services" every [x number of] mile(s) could have negative impacts (for example, on transportation and quality of life) depending on the context of the neighborhood. Using the "mixed-use" concept can result in far different outcomes, depending on whether it is being applied at the level of individual developments versus at the neighborhood scale. The public has consistently stated a concern with excess commercial development, particularly given its impacts on workforce housing shortages. An increase in commercial development potential (beyond what is allowed by existing base zoning) should not be a goal in the plan.
- (Staff Question 4) In terms of identifying "stable" residential areas, it is important to define what it means to "stabilize" certain districts. The 1994 Plan uses the following language: "In other areas, an auto urban or suburban character should be preserved; at the same time it is recognized that some enhancement is needed. In practical terms, this means that new development in these areas should contribute to the existing character and not be allowed to start a shift or trend toward another more intense character type."

- (Staff Questions 5-8) To provide greater specificity on some of these questions, it is important to clarify the geographic scope of “downtown Jackson.” Regarding the issues of defining “vibrant” and balancing visitor and local-oriented development, the plan should not lose sight of our town’s unique role as a gateway community to public lands of the Greater Yellowstone Ecosystem. Making our community accessible, particularly in terms of affordability to visitors, is an important component of the town’s function as a gateway community.

As for short-term lodging, it certainly provides a critical component of our tourism economy, but the actual costs and benefits lie in the details. There are certainly thresholds at which the amount of certain types of lodging can impact the feel of being a community first, and resort second, and whether “lights stay on,” as described by staff. **Overall, it is important to remember that if our community truly commits to being a “community first” and commits to high levels of residential and nonresidential development that is local-oriented and puts affordable housing closer to the workplace, it will also have positive impacts for the visitor. In the long run, most visitors want to experience a real, functioning town, rather than an environment that feels like the primary goal is to be a resort.**

Regarding 7(b), before promoting changes to expand lodging potential, an analysis of effective population, as well as of shifts in lodging capacity, should be undertaken. Is data available (such as net loss of lodging units) that could inform the discussion? In general, given the extensive development potential already permitted by existing zoning, development potential for lodging should not be increased, particularly given the impacts that arise from an increasing effective population (visitors and residents) in the valley.

As for an alternative hearing process, the Conservation Alliance does have a lot of concerns about the impacts of split votes, and how they are affecting the final product. If you decide to have some type of parallel process, please hold the town and county meetings on different evenings for the benefit of the public. The idea warrants significant consideration because something does need to change.

I’ll end there for this evening. Thanks.



Re: Theme Three Discussions

Below are the comments Kristy Bruner, Community Planning Director, verbally presented at the December 10 Hearing.

Just a brief comment tonight. In response to some of the issues discussed last night, we would strongly encourage you to revisit and vote on the county planning commission's recommendations from June 2009, particularly votes 12-14 as they relate to town development. This is important since town discussions were bypassed in your previous review of Theme Two "managing growth responsibly."

Other than these items, I would just ask you to refer to our written comments for our additional suggestions on how to improve this chapter. Thank you.

Re: Theme Three: Uphold Jackson as the “Heart of the Region”

*Below are the comments Becky Tillson, Community Planning Associate, verbally presented at the **December 17** Hearing.*

Becky Tillson, Jackson Hole Conservation Alliance. Thank you for the opportunity to comment tonight.

First, we wanted to thank you for your hard work and dedication this year. We hope that you will continue to ask the hard questions that are so critical in this planning process. The deadline that was set to complete your review of Theme Three tonight is not nearly as important as having the hard-hitting, meaningful discussions about Town that have not yet happened.

As you get through the staff’s questions, which are a great starting point, we do not think that your review of this theme is finished. There are numerous other issues that have been brought forward by members of the public that still need to be addressed. We outlined many of these in our written comments, and actually provided 13 specific recommended actions.

Here are just a few of the key issues that we hope you will vote on tonight:

First, regarding future growth in town, the public supported “growth districts” ONLY with specific tradeoffs in mind, which should be more clearly articulated in the text of this theme;

Second, the rewrite of this chapter should include much more detail on how character preservation is to be achieved during town redevelopment, including discussions of bulk and scale and how this affects both the feel of town and its day-to-day functioning;

Third, the indicators section needs value added to it as opposed to merely monitoring changes over time. We have provided a number of suggestions in our written comments to help improve this theme’s indicators;

Fourth, we would recommend that the “what the community has said about this theme” sections in all of the chapters be either removed or corrected for accuracy and completeness;

And lastly, we believe that an additional principle to address the unique wildlife-related issues in town should be added. For example, the STAG group identified Flat Creek as a unique amenity in town, which could and should be highlighted in this new principle.

And of course, as we, and the public, have consistently asserted, the “Gorilla in the Room” - the impacts and unpredictability that are inherent in the use of discretionary tools, particularly the PMUD - needs to be addressed.

Thank you again for all of your time and hard work.



Re: Theme Three: Uphold Jackson as Heart of the Region

*Below are the comments Becky Tillson, Community Planning Associate, verbally presented at the **January 7, 2010** Hearing.*

Becky Tillson, Jackson Hole Conservation Alliance. Thanks for the opportunity to comment tonight.

Thank you also for taking this extra day to be sure that the review of Theme Three is complete. It's important for this body to address the things that are important to the public.

Regarding Theme Three, we have submitted written comments with specific recommended actions, followed by rationale and explanations. We also raised several significant questions that we hope will be addressed. Here are a few key points for your consideration tonight:

- Commissioner Allen suggested in this week's staff report the inclusion of a section regarding ecological and wildlife issues specific to town, as outlined in our comments. This important addition should be centered on the protection of areas that abut and interact with public lands, riparian areas and watershed health and quality in and near Town, slopes that function as crucial winter ranges, and corridors that ensure wildlife habitat connectivity.

This addition will be particularly important for sensitive species, including moose and mule deer, that are currently at below-target-population levels and that rely on in-town habitat.

- Second, transportation issues specific to Town should be addressed in more detail in this theme. For example, West Broadway has the highest mortality rate for mule deer in all of Teton County, which should be taken into consideration. Even if much of the discussion is postponed until the transportation theme, a reference to or mention of the interactions of transportation and wildlife in town would be useful.

- Lastly, the indicators section could be improved by including, for example, percentage net gain, preservation and loss of affordable housing units within Town boundaries, transportation efficiency, watershed protection, and wildlife habitat preservation in both the Town and the County, all of which are factors that measure the success of the "Town as Heart" vision and policies. The indicators section should also include baseline conditions as MEASURABLE starting points.

And, as we have with the other themes, we will also be submitting more detailed comments on Theme Four in the coming weeks.

Thank you again for all of your time and hard work.