



Jackson Hole Conservation Alliance

Preliminary STAG Comments: Jackson/Teton County Comprehensive Plan April 2009 Draft

4/29/09

In brief, below are *some* of the key, broad issues that the Jackson Hole Conservation Alliance believes are important to address in the upcoming meeting. The Jackson Hole Conservation Alliance will be submitting line-by-line, detailed comments on the new draft prior to the planning commission hearings. During future comments, we will provide detailed recommendations for changes in policy language and the structure of the plan.

The current approach and key elements of the plan do not reflect the will of the community.

On October 15, 2008, the Planning Team placed an ad to confirm recognition of top community concerns voiced during public comment. Unfortunately, the new draft falls short in addressing them. See ad text below:

“The Comprehensive Plan Will Be Responding to Public Comment: What you said:

- *Wildlife and open space protection is the most important value in the community.*
- *Buildout should be clearly identified and provide guidance in policy creation.*
- *Growth rate regulation should be implemented to slow the impacts of development to natural resources and community infrastructure.*
- *Workforce housing should be provided in greater proportion by commercial development and include a mix of rental and ownership options.*
- *Commercial development potential should be limited with sensitivity to building design, community character, and not exacerbate the workforce housing shortage.*
- *South Park should only develop at town level density in the northern portion in order to address the workforce housing needs of the community.*
- *Plan format should be more clear, concise, and user friendly.”*

The current draft doesn't give appropriate attention to all factors (direct, indirect and cumulative impacts) that affect our ability to protect wildlife; buildout was not clearly identified and did not provide guidance in policy creation; growth rate regulation is identified as a step to take only *if* future monitoring indicates the need to do so; weaker language (than in the '94 Plan) is used to describe the relationships among different community issues/themes, particularly commercial development and workforce housing shortages; strong policies to limit commercial development are absent; proposed ranges for development in South Park far exceed the geographic scope presented in surveys and policies indicate sprawling development (north to south) for future planning in this district; and the plan format is not clear or user friendly given the map layouts and a number of vague and contradictory policies.

Other Key Issues:

- **Amount of proposed development potential – residential and commercial – should be reduced.**
- **The impacts of commercial development are inadequately addressed in theme chapters. Drivers of growth-related impacts are underemphasized and inadequately described.**
- **Theme chapters, and the structure of the Future Land Use Plans inadequately address that our community must face, and answer, tough questions about carrying capacity (amount of overall development). As we increase the potential for direct, indirect and cumulative effects associated with human-related development impacts, there is a strong potential for crossing thresholds (in terms of survival of local wildlife populations).**

- **The meaning of Theme 2 “Managing Growth Responsibly” has changed significantly through this process.**
- **Geographic prioritizations (and district boundaries) in many node districts are highly debatable.**
- **The draft does not cohesively link different themes and policies. The Future Land Use Plans, as currently drafted, would not uphold the policies outlined in the draft.**
- **The draft rests on a number of assumptions that are not backed up with analyses. The draft suggests that the extent of development proposed within the nodes would have minimal ecological impact; however, we disagree, particularly given indirect and cumulative impacts.**
- **Permanent Conservation is a top priority of this community. We need to make sure that policies are in place to encourage permanent protection.**
- **There are MAJOR policy shifts from the '94 Plan to this new draft. The new draft reflects much more than an “update” of the '94 Plan. Key issues include: the lowered emphasis on scenic resources and rural character (in the county and town), transportation policies, and fundamental assumptions on the need for continued growth.**
- **Indicators need to be refined in all theme chapters.**