

Please Speak Up – Jackson Hole’s Wildlife Need Defense!

Written comments on the Comprehensive Plan’s revised Theme One, “Practice Stewardship of Wildlife, Natural Resources, and Scenic Vistas” are due Nov. 12.

To help you get started on your comments, here are five broad issues we

believe the town and county planning commissioners must address before the new Jackson/Teton County Comprehensive Plan is sent to elected officials for their review. (To be incorporated in revisions to the draft Comp Plan, the town and county planning commissions must **both** pass the same recommendations. Here is a link to their preliminary recommendations as of Oct. 30: <http://www.jhalliance.org/CompPlan/RecsToDate.10-30-09.pdf>.)



- **Recommendation #113 – Add a strategy: creation of an additional Wildlife Stewardship Plan under the direction of the Environmental Commission to detail implementation of Principle 1.1** (*County 2-2 Fail, Town 1-4 Fail*)

What You Can Do: Ask the planning commissioners to ensure that more specific data, language and mechanisms to protect wildlife are incorporated into the plan, and that existing data and knowledge are efficiently utilized. In short, reincorporate science-based language from the 1994 Plan and recent data (including a map of the Natural Resources Overlay) into the new plan.

Background: Since the release of the new draft, the Conservation Alliance has repeatedly raised concerns regarding the removal of significant portions of the community’s existing 1994 Plan that include specific language and mechanisms for protecting wildlife and wildlife habitat. While some positive steps have been taken in the new draft (such as the establishment of an Environment Commission and additional policies on wildlife permeability), far too much of the science-based language in the 1994 Plan has been removed. Some examples of language/ topics that have been removed include: highly specific descriptions of the role of private lands for wildlife, statements of existing conditions and challenges (such as “wetlands have been severely impacted by development” and “current development trends pose a real threat to wildlife habitat now and in the future”), references to detailed science-based reports (such as the “Biota report”) as a basis for policies and land development regulations, specific definitions and examples of direct, indirect and cumulative impacts, specific descriptions of important habitat types, clearly outlined criteria for formation of the Natural Resources Overlay, clear rationale for the need to regularly update the Natural Resources Overlay, and a list of additional species of concern that are currently not listed. To put it into practical terms, the new rewrite does not adequately integrate science nor does it efficiently use what our community has already spent considerable resources to produce – such as the Biota report prepared as part of the 1994 Plan or the recent Conservation Alliance-sponsored compilation of data conducted by the TSS Conservation Research Center.

The idea of a supplementary “Wildlife Stewardship Plan” to compensate for the lack of detail in the new plan failed. Without this supplementary plan on the table, and to make the process more efficient and effective, staff should be directed to reincorporate and update language from the 1994 Plan. It appears that in an effort to be concise, essential components were removed that should not have been removed. These sections from the existing 1994 Plan should be built upon and in some instances clarified, such as adding new information on topics such as climate change and its potential impacts on wildlife habitat, rather than removed altogether. Also, upon close review of the 1994 Plan chapter on Natural and Scenic Resources, it appears that there was not a lack of stated intention or vision, but rather a lack of enforcement to carry out specific actions (such as “regularly update all natural and scenic resource inventories). The same concern with removal of important details also applies to the rewrite’s approach to scenic resources.

- **Recommendation #103 - Include all appropriate Game and Fish language into document** (*County 4-0 Pass, Town 2-3 Fail*)

What You Can Do: Ask the planning commissioners to ensure that the red-lined, rewritten draft of Theme One that is sent to elected officials includes an incorporation of Wyoming Game and Fish comments.

Background: In June 2009, Wyoming Game and Fish submitted five pages of comments that included science-based concerns with the draft plan, as well as recommendations for improving it. Unfortunately, commissioners did not collectively review the agency’s individual recommendations including: the need to update the Natural Resource Overlay, the need to identify a timeline for developing a list of focal species, a need to include important

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habitat types in the plan, a need to establish buffer zones, a need to realistically address the implications of a high buildout on wildlife health and landscape permeability, a need to add increased emphasis on the impacts of dispersed recreation, and a need to address a potential increased demand for wildlife management services. Wyoming Game and Fish provided the following statement in their comments: “The draft plan could incorporate more specific language, data and mechanisms to provide the degree of stewardship identified in the introduction of the Comprehensive Plan...”. Unfortunately, due to a failed vote by the Town Planning Commission, no attempt was made to incorporate the agency’s suggestions in the rewrite released October 30, 2009. As a result, the chapter rewrite currently lacks critical science-based language that would more accurately describe our existing conditions and the extent of action necessary to increase our chances of actually protecting wildlife.

- **Recommendation #105 - Add a policy/strategy creating a public funding source for the acquisition of conservation easements and/or open space** (County 3-1 Pass, Town 2-3 Fail)

What You Can Do: Ask the planning commissioners to add the following strategy: “Establish a dedicated funding source to acquire permanent open space for wildlife habitat protection, scenic vistas preservation and agricultural preservation.”

Background: Across polling surveys done as part of the comprehensive planning process, 59.8 to 78 percent of citizens voiced support for a funding source for permanent open space conservation. Citizens expressed they would be willing to pay more in taxes for open space over any other issue. However, unlike other issues in the plan (affordable housing and alternative transportation), a strategy to establish a funding source for conservation was not included. Continued acquisition of permanent open space is a critical wildlife protection and growth management policy, an ESSENTIAL component to uphold our top priorities. The Conservation Alliance believes that the public has a right to vote on this issue. While we are currently in troubling economic times, the plan should include policies with the long-term community vision in mind.

- **Recommendation #115 – Incorporate statement, “Recognize that any and all growth in the valley impacts both wildlife and natural resources” into Theme 1 where appropriate** (County 5-0 Pass, Town 3-2 Pass)

What You Can Do: Ask the planning commissioners to incorporate specific language that wildlife protection should be the primary consideration in all land use decisions.

Background: By directing that wildlife protection be the first consideration in every decision, it is assured that all forms of impacts are considered, including direct, indirect, or cumulative impacts. Because wildlife needs can be incredibly dynamic through time, overall development in the valley must be comprehensively approached. While we greatly appreciate that the above motion passed in preliminary votes, we believe that the rewrite did not go far enough to explain why “least growth” solutions are such a critical component of wildlife protection policies, and how the levels of growth, regardless of where the growth occurs, will greatly influence our success in protecting wildlife.

- **Recommendation #109 – Look at indicators suggested by public and include in list for elected official review** (County 4-0 Pass, Town 5-0 Pass)

What You Can Do: Ask the planning commissioners to direct staff to further work with appropriate agencies and partners to outline a science-based monitoring program and to provide language that clearly explains how indicators will be used to draft and amend land development regulations.

Background: The use of indicators to “monitor achievement” is a great, key improvement upon the 1994 Plan. However, as they are currently designed, their potential effectiveness is highly questionable. Since July, the Conservation Alliance has emphasized that this table must include an initial column that summarizes quantifiable **baseline conditions**. The goals should also be measurable and review periods should be realistic for the variable being measured. Variables that are critical in defining and implementing local land development regulations should be prioritized. Staff should also incorporate more language to explain how monitoring will be translated to modifying land development regulations and directing changes in policy. For instance, there are Wyoming Game and Fish monitored populations (which are also identified as species of concern) that are ALREADY below target. How does this affect future policy?