

**Re: Administration Chapter and Final Certification Vote, Jackson/Teton County Comprehensive Plan**  
*Below are the comments Pegi Sobey, Alliance Board Chair, verbally presented at the July 1, 2010, hearing.*

Pegi Sobey, Board Chair, Jackson Hole Conservation Alliance

Thanks for the opportunity to comment tonight.

We have submitted comments regarding the Administration chapter, and hope that you take the time to get this important section right.

More recently, we have also submitted written comments on behalf of our Alliance members regarding the proposed resolution to “adopt and certify the 2010 Jackson/Teton County Comprehensive Plan as THE comprehensive master plan for our community.

I would just like to emphasize a few questions about this last issue that we believe must be answered prior to your much-deserved break from these Comp Plan discussions.

The draft resolution before you clearly indicates that the Themes and Policies alone are intended to be our new comprehensive plan. This would mean that what was once nearly half of the proposed Plan -- the Future Land Use Plan -- will not be considered a part of the Plan itself. The draft resolution even goes as far as to state that the FLUP could be added later as an appendix. This change from the April 2009 draft plan warrants discussion and clarification as to the legal implications and unintended consequences of this significant shift.

The Themes and Policies section alone will not suffice as an acceptable replacement for our existing plan, because the current draft lacks the maximum level of clear guidance and direction that our comprehensive plan must provide. The Future Land Use Plan was explicitly designed to be a critical piece in order to bring increased predictability to the overall plan.

If the Future Land Use Plan is not going to be a specific part of the new plan, major changes must be made to the Themes and Policies to include adequate guidance for the land development regulations and future land use decisions.

We strongly recommend that you adopt the second bullet point identified in the staff report and request that your joint bodies be asked to complete a review of the Future Land Use Plan following approval of the Vision and Themes by the elected officials. And further, the elected officials must wait to adopt the 2010 Plan in its entirety until completion of the joint planning commissions’ certification of the Future Land Use Plan.

For example, if bullet four from the staff report is adopted and only the elected officials review the Future Land Use Plan, does it mean that the Future Land Use Plan cannot officially be considered part of the plan? This sort of question must be answered prior to the completion of your review process.

To be clear, throughout this review process, the Conservation Alliance has raised a number of concerns about the Future Land Use Plan, and we continue to believe that this section needs significant modifications and amendments.

In conclusion, the Conservation Alliance insists that any new Comp Plan must have some component -- whether it is the Future Land Use Plan or simply more narrative in the Themes and Policies -- that will bring increased predictability to the community and provide for enforceable policies. In any case, if it is to be included, the Future Land Use Plan must be an essential part of -- not an appendix or addendum to -- our community's Comp Plan.

We, therefore, ask that the planning commissions recommend that the elected officials wait to adopt the 2010 Plan in its entirety until after the joint planning commissions complete their review of the Future Land Use Plan and also that you make the necessary changes to the resolution before you to reflect this.

Thank you for your hard work throughout this review process and for all the time that you, as volunteers, spent working to uphold our community's priorities. And thank you for the opportunity to comment this evening.