



March 25, 2010

Town of Jackson and Teton County Planning Commissions  
Re: Theme Six Comments  
Submitted via email to Alex Norton

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 Six - "Develop a Multi-Modal Transportation Strategy."

Attached are line-by-line comments and suggestions for discussion related to Theme Six. Listed below are key points that we hope are clarified in discussion and/or incorporated into a new draft of this chapter.

First, **it is important to specifically identify how Chapter Eight of our existing plan is going to be used and integrated with the draft's Theme Six.** During a previous workshop, it was suggested that both Chapter Eight and Theme Six will be included as part of the new Comp Plan. Clarification on how this will work is essential. As we have consistently voiced throughout this process, in many cases the new draft is a step backwards from the existing plan. Perhaps nowhere is this more obvious than in the chapter on transportation. **Please read and revisit Chapter Eight of our existing plan before you start your recommendations/voting on the new Theme Six chapter.** In comparison to the new chapter on transportation, the existing chapter, which was adopted in 2000, would provide better guidance in terms of predictability, measurability and accountability than the new draft. As voiced in the March 23 workshops, much of the problem is not how the 2000 plan was written, but rather that it hasn't been followed or enforced. The hard work that has gone into previous planning efforts should be built upon and enhanced, not weakened or eliminated.

Second, **we fully agree with the points raised by transportation consultant Robert Bernstein that this process should include a comprehensive transportation analysis that is beyond what has been provided to date.** The improvements necessary to support the expected growth outlined by a proposed Future Land Use Plan must be identified. Otherwise, decisions could be made without an adequate understanding of their implications. We also would like to see more discussion on the importance of setting infrastructure goals based on an understanding of fiscal impacts, which was a key discussion point at the morning workshop on March 23. One of the more compelling points made was that **creating a fiscally constrained plan is what helps a community set realistic priorities. Without this component of knowing whether improvements and projects are financially feasible, the plan could result in simply a wish list with little guidance for prioritized implementation.** You must ask - what does our community need to support anticipated growth, in terms of transportation infrastructure, and can we afford it, both financially and in terms of achieving other community priorities, like wildlife protection?

Third, and related to our concerns with not using our existing plan as a strong foundation for the new plan, **there are critical elements missing from the new chapter.** As an example, one of the three main land use strategies in our existing plan is "eliminating transportation demand by reducing the overall amount of residential development in the county." However, there is no mention in the new chapter about how the overall amount of development is a factor in traffic growth rates. While the concept of shifting development into the town and mixed-use villages concept is included in the existing plan, there was clear recognition that in order for these land use strategies to bring benefits, the shift had to be combined with the continuation of conservation easements. Interestingly, **the clear language about the need for continuation of permanent conservation easements, as a transportation strategy, (in terms of "incremental trip reduction") has been removed in the new draft.** The following is the strategy statement in our existing plan: **"Facilitate conservation acquisitions including seeking funding in locations where removal of vehicular traffic from roadway corridors has the greatest benefit on the transportation system."** No such statement exists in the new chapter on transportation. It needs to be reinstated.

Fourth, as suggested in public comment, **the new chapter needs to reinstate a much broader focus and clearer policies to implement a multi-modal system.** Language should be incorporated that speaks to the ideal goal outlined in the March 23 workshop, that the policies must directly create the conditions and opportunities that allow people to choose not to drive. Within these policies, realistic identification of existing conditions and challenges, which are unique to Jackson Hole and not Anytown USA, is also really important. Understanding and recognizing traveling behaviors associated with lifestyles in Teton County is important in achieving overall goals. Friends of Pathways has provided excellent comments to help improve the language regarding implementation of a multi-modal system.

Fifth, our existing plan includes considerable language that links all community goals to community character preservation. For example, the first goal of our existing transportation chapter is to “systematically plan for future mobility that meets the needs of residents and tourists within the context of community character.” **Many of the previous planning decisions regarding transportation infrastructure have been related to rural character preservation. However, the new draft does not speak to this concept, which is a concern.**

Finally, **when discussing the role of land-use patterns (i.e. compact centers and dispersed patterns) as it relates to transportation, it is essential to not oversimplify the issue.** The Conservation Alliance supports the need for confined development footprints, but we have not supported the way the new draft implemented the nodal concept, specifically the manner in which “nodes” were defined. All nodes, centers, or confined development footprints are not created equal, which the new draft failed to address. The larger context, which includes location, scale and type of development within these areas, must be considered and analyzed in order to evaluate the benefits and costs. Also, in many of these identified areas, there is already considerable development potential still on the table. Ultimately, the capacity to uphold community priorities will weaken through time if our community’s vision of planning is to simply promote more growth (physical expansion) in places where growth has occurred in the past – in spite of whether those areas are important in terms of wildlife, scenic vistas and small mountain town character preservation.

We urge you to evaluate this chapter with the larger goal of the planning process in mind. We shouldn’t get so far beyond the basic point of this process – to improve and refine our existing plan – that we forget what we can build upon. We urge you to direct staff to not only carry out the additional modeling and analysis upon which your decisions can be better informed, but also to reincorporate the positive work that is in our existing chapter on transportation.

Thank you for your consideration of these comments.

Sincerely,



Kristy Bruner  
Community Planning Director



Becky Tillson  
Community Planning Associate

# Develop a **Multi-Modal**<sup>1</sup> Transportation Strategy (Theme 6)

## *Statement of Ideal*<sup>2</sup>

*Reduce resident and visitor reliance on single occupancy vehicles while still allowing safe, efficient, and economic travel.*

### **What does this theme address?**<sup>3</sup>

- 6.1 – Increased use of alternate modes
  - 6.2 – Decreased emphasis on single-occupancy vehicles
  - 6.3 – Interconnected transportation system
- Priority Transportation Network Projects



This Plan focuses on multiple modes of transportation, including walking.

## Why is this theme addressed?

Traffic congestion and wider roads are inconsistent with the rural character and natural and scenic resource values of the community. Teton County’s development pattern (like many rural, mountain communities in the west) depends upon the automobile to move people to and from services. Traffic is growing at a faster rate than population in Teton County; and traffic levels have reached capacity on many of the community’s major roadways. Immediate action is necessary to achieve the preferred transportation future defined in this Plan; otherwise, we face the need for more roadway widening in the near future.

Single occupancy vehicles (SOV) are the least efficient means of travel in terms of traffic, impacts to the ecosystem, and social interaction. A transportation system oriented to the automobile requires more available land and has a greater carbon footprint, all of which have negative impacts on rural character and conservation of wildlife and natural resources. To meet existing traffic needs and plan for a future that does not include widening roads, the community must figure out a way to slow traffic growth<sup>4</sup> along major corridors rates from 3.5% annually to 2%. This will require that an additional 10% of all trips along these major corridors be shifted out of single occupancy

vehicles into another travel mode.<sup>5</sup> Transit offers the most viable alternative to vehicular travel, however, roadway designs that use the “complete streets” principle will help ensure that roads safely accommodate all modes of travel.

Transportation choices made in Jackson and Teton County must be considered regionally. Workers living in Teton Valley in Idaho and Star Valley in Wyoming add to the traffic on Teton Pass and in Snake River Canyon.<sup>6</sup> These trips inevitably increase the number of wildlife-vehicle conflicts and increase carbon emissions in the region. Isolated development within and outside of Jackson Hole reduces the viability of transit as a transportation alternative and complicates the achievement of our transportation goals.



Bicycle and transit use in the Town of Jackson and in and between county nodes will help alleviate local traffic.

Realistically, the continued convenience, affordability, availability, and necessity of the automobile, limits the amount of traffic reductions that will be achieved through travel mode shifts. Intersection and roadway improvements will still be required in some areas. It is important for the community to work with Wyoming Department of Transportation (WYDOT), federal agencies, neighboring jurisdictions and private land owners to find solutions that are both consistent with community values and acceptable for partnering agencies.



Vehicles will likely continue to be the preferred form of transportation in rural areas.

A wealth of data was compiled and analyzed in 1998 and 1999 regarding traffic growth. The result was the Transportation Plan adopted in January 2000 that established specific land use, transit, roadway, funding, and administration strategies for reducing traffic growth. (See Appendix K: Transportation.) The conclusions of the 2000 Transportation Plan regarding nodal land use patterns and the need for a mode shift inform the policies of this Plan. Detailed analysis of the community’s transportation system and mode of travel will be completed to monitor the effectiveness of policies implemented as a result of this Plan.<sup>7</sup> The policies presented in conjunction with this theme represent the conceptual focus for transportation planning in the future. The policies prioritize transit, alternative modes of transportation and limited additions to our road network.

## What the community has said about this theme

The community has consistently stated that while roads are congested and traffic feels like it is getting worse, switching to alternate modes of transportation is preferable to widening roads. Many members of the community would be willing to pay more taxes to expand bus service and pathway infrastructure. Some members of the community are worried about the impact new development will have on the transportation system, and many believe that transportation system considerations are an important part of land use decisions. In addition, 2008 polling indicated that:

- A slight majority of the community would rather see “preservation of wildlife migration corridors” over “adding traffic capacity by widening roads”. Similarly, a majority of the community prioritizes “increased transit service” over “building new roads”.
- The community is somewhat split regarding a “focus on constructing roads to relieve traffic congestion”, whereas about half of the community disagrees with the “construction of carpool/bus lanes to relieve traffic congestion”. People are also split as to whether “more lanes should be added to existing roads and intersections to relieve traffic for all modes of travel”.
- A vast majority of the community agrees that “the Town and County should promote walking, bicycling, transit, and carpooling as alternatives to widening roads”.

## Principles and Policies

### Principle 6.1—**Increase the share of trips made by alternate modes, especially transit<sup>8</sup>**

*A key component of the 2000 Transportation Plan was the Alternative Modes and Programs implementation strategy. To achieve the traffic growth reduction goals that were identified in that plan, a proposed mode shift away from the single occupancy vehicle is required. The most viable way to achieve a significant shift is by an increase in the transit mode share, but other alternatives such as carpooling, walking, and biking are also important.*

#### **Policy 6.1.a: Establish a permanent funding source for transit**

An effort to increase the share of trips made by transit will require increased public investment. Additional public investment in transit vehicles and facilities is needed to allow for the growth of the transit system. Prioritizing a transportation mode shift requires viewing investment in alternate mode infrastructure as equally, if not more, important than investment in single occupancy vehicle infrastructure.

Every member of the community will need to consider walking, bicycling, carpooling, or riding transit instead of driving his or her vehicle.

#### **Policy 6.1.b: Shift community transportation behavior**

The choice for mode of travel is made every day by residents **and visitors<sup>9</sup>** in the valley. The town and county will work to make alternate modes of travel convenient and efficient, and increase the share of trips made by alternate modes. Community members will need to consider walking, bicycling, carpooling, or riding transit instead of driving their vehicles. Making the decision to use alternate modes benefits an individual’s health and social networking, in addition to the community’s transportation and environmental goals. Administrators of alternate transportation programs will continue to educate and work with the community and employers to promote use of alternate modes of transportation.

#### **Policy 6.1.c: Research Regional Transportation Authority viability**

The community will also work with adjacent counties, states, and federal land agencies to coordinate the design and use of external components of the transportation system by Teton County residents and workers; and will explore the utility and viability of a Regional Transportation Authority.

#### **Policy 6.1.d: Interconnect all modes of transportation**

The transit system provides a tool to connect all modes of travel. Park'n'rides, bicycle parking, and similar facilities will be incorporated into transit stop design to promote the use of transit along major roadways even if it is not viable on smaller interior road networks.

### **Principle 6.2—Reduce reliance on single occupancy vehicle travel**

*Making alternate modes of transportation an easier choice requires that more emphasis be put on provision for those modes than on the accommodation of the single occupancy vehicle (SOV).*

#### **Policy 6.2.a: Develop in a land use pattern based on “nodes”**

A series of nodes (with the Town of Jackson being the largest) throughout the valley enables connection of the community by transit.<sup>10</sup> In addition, by providing housing, recreational opportunities, and community services in the nodes within walking distance make travel by walking and bicycle more viable, thereby reducing automobile trips.

#### **Policy 6.2.b: Provide for alternate modes of travel as the preferable method to relieve traffic**

Where traffic congestion needs to be relieved, solutions that emphasize an increase in the mode share of alternate modes are most appropriate. Additional capacity that is created for single occupancy vehicles always fills up with more single occupancy vehicles. Conversely, if an increased proportion of the trips made are by alternate modes, growth in traffic will decrease.<sup>11</sup>

#### **Policy 6.2.c: Require development to promote alternate modes of travel**

If development and redevelopment continues to focus on accommodating automobile users, people will continue to drive. The town and county will require facilities and building orientations that promote transit, walking, and biking locations where such modes of travel are viable.

#### **Policy 6.2.d: Discourage single occupancy vehicles**

Incentives to use alternate modes of transportation will not be enough to reduce the reliance on single occupancy vehicles if the use of that mode remains as convenient as it is today. To discourage automobile use, the town and county will use “Level of Service D,”<sup>12</sup> as determined by American Association of State Highway Transportation Officials standards for autos, as an acceptable level of congestion and delay along roadways and at intersections. Paid parking in areas served by alternate modes and other financial means can also discourage SOV travel.



START bus

### Principle 6.3—Maintain a safe, efficient, interconnected, multi-modal transportation system

*While the transportation vision of the community is to reduce reliance on the automobile and particularly single occupancy vehicle travel, the health, safety, and welfare of the community are paramount. Monitoring of the entire transportation system and making appropriate increases to capacity will be required.<sup>13</sup> This will include widening roads and intersections in some cases. In all cases such improvement will be designed and implemented consistent with community values.<sup>14</sup>*

#### Policy 6.3.a: Create a transportation network based on “Complete Streets” and “Context Sensitive Solutions”

Streets and roads will continue to be the primary components of the Teton County transportation network. To meet the community’s transportation vision, they should safely accommodate all users of the public right-of-way including: pedestrians, bicyclists, auto drivers, and transit riders. The town and county will lead the implementation of this policy through the design and redesign of the public road network. The community will also work with WYDOT to implement “Context Sensitive Solutions” into their projects.

#### Policy 6.3.b: Coordinate transportation network decisions

Because the town and county do not have jurisdiction over much of the transportation network, cooperation with WYDOT is important in the realization of the community vision.<sup>15</sup> The community will continue to work with WYDOT to incorporate community values into solutions for improvements to the state highway system to recognize the mission and goals of the Federal Department of Transportation. The community will also work with private interests to acquire easements and rights-of-way needed to facilitate realization of our transportation vision.

#### Policy 6.3.c: Review land use proposals and decisions against their transportation network impacts

A critical component of informed transportation planning is concurrent review<sup>16</sup> of transportation impacts with land use impacts. As land use decisions are made that will have transportation impacts, the town and county will require those impacts to be identified and mitigated. Development decisions will be made with an equal and concurrent consideration of both land use and transportation impacts. On a regional scale, we will recognize that the decisions of

the community have effects reaching outside of our jurisdiction. Decisions regarding the balance of conservation and the provision of community needs will be evaluated for their local and regional transportation impacts.<sup>17</sup>

#### Policy 6.3.d: Reduce wildlife and natural and scenic resource transportation impacts<sup>18</sup>

More vehicles on the road increase the likelihood of wildlife-vehicle collisions even if mitigation efforts are pursued. New transportation network projects will address wildlife crossing issues; furthermore, the community will provide for wildlife crossing needs along existing transportation facilities. New transportation network infrastructure will be designed to have only minimal and mitigated impact to wildlife and natural and scenic resources.

#### Policy 6.3.e: Maximize interconnection, redundancy, and hierarchy in the transportation network<sup>19</sup>

Critical to the assurance of a safe, efficient and complete transportation system is developing a network that is interconnected and has redundancy if a road or bridge closure due to a natural hazard or other event. It will be important to strike a balance between adding new roads and widening existing roads to address this issue.

## Potential Transportation Network Projects<sup>20</sup>

Based on 2008 modeling and previous transportation planning efforts completed by the community, the following transportation network projects are suggested as priorities to relieve congestion at key intersections in the transportation network. This list is not an exhaustive list of the projects that may be pursued in the timeframe of this Plan; it is intended to identify the projects for immediate consideration and more detailed modeling and planning.

While the community is not generally supportive of widening roads, **these five potential projects will be necessary to avoid complete congestion of the transportation network.** More detailed traffic and environmental analysis will be done prior to the design and construction of any of these projects.

1. Tribal Trials Connector between Highway 22 and South Park Loop Road.  
This project is projected to reduce traffic at the “Y” by 28% without causing significant increases in traffic at other major intersections. Design of this project will involve more detailed modeling of the road system in the area of the project and account for the unique safety concerns of the project’s proximity to the community’s major education campus.
2. Upgrade Snow King – Maple Way.  
This is a parallel east/west corridor.

3. Reconstruct the “Y” (Highway 22/89/26 intersection). This project will improve all modes of travel and serve as a community gateway.
4. Pursue a multi-lane roadway with WYDOT on Highway 22. This project is between town and Highway 390 and provides trail connections, wildlife overpass, and dual bridges across the Snake River.
5. Redesign Highway 390 . This project is from Highway 22 to Teton Village.

Other projects were analyzed as well, but were determined to have minimal system benefit. A north crossing of the Snake River and the paving of Spring Gulch Road would decrease traffic at one congestion point, but increase traffic a similar amount at another congestion point. In the case of the north crossing, traffic would be decrease at the “Y” but increase at Town Square. Paving of Spring Gulch Road would decrease traffic in Town but increase traffic at the “Y”. Both of these projects have land use, wildlife, and natural and scenic resource impacts that are greater than the transportation benefits they provide. Neither is recommended at this time.

## Strategies<sup>21</sup>

The Town of Jackson and Teton County 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 6.1: Establish a dedicated funding source for alternate modes of travel**

- Dedicate a seventh cent sales tax, additional mil property tax, or other funding source to the provision of infrastructure for alternate transportation modes with transit as the priority.
- Fund the construction of a START facility to continue to expand and operate the facility efficiently.
- Continue to fund the administration of alternate mode travel programs through the General Fund so additional money can be dedicated to infrastructure.

### **Strategy 6.2: Create a new transit facility**

- Identify an appropriate location for a new START storage and maintenance facility that will allow expansion of transit service.

### **Strategy 6.3: Create a behavioral shift program to increase travel by alternate modes**

- Educate the community on alternative mode travel options and benefits.
- Pursue home mail delivery.
- Encourage or require students in all grades to take alternate modes of transportation to school rather than driving or being driven.
- Pursue transit service between Jackson and the airport.
- Establish a trip reduction coordinator to work with employers to reduce trips and facilitate carpooling.

### **Strategy 6.4: Update road design standards**

- Include "Complete Streets" and "Context Sensitive Solutions" policies in road design regulations.
- Include wildlife crossing and other wildlife mitigation standards in road design regulations.

### **Strategy 6.5: Update land use review standards**

- Concurrently review development projects for transportation impacts that can be mitigated.
- Track incremental impacts and periodically evaluate their cumulative effect.
- Institute a countywide transportation demand management program.
- Adopt design standards to promote alternate modes of travel.
- Reevaluate parking standards and other regulations that may promote the single occupancy vehicle.

### **Strategy 6.6: Cooperatively create, maintain, fund, implement, and monitor a joint town/county Transportation Capital Improvement Plan**

- Prioritize projects within the plan across all modes to implement this theme.
- Establish permanent traffic counters for all modes of travel on specific corridors in order to monitor the effectiveness of crucial segments of the transportation system.
- Periodically evaluate the entire transportation system for inadequacies and propose remedies.

### **Strategy 6.7: Research a Regional Transportation Authority**

- Discuss with neighboring jurisdictions and state and federal officials the costs and benefits of a Regional Transportation Authority.

- Discuss with neighboring jurisdictions improvements that can be made to the regional transportation system.

## Indicators<sup>22</sup>

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

Multi-Modal Transportation Indicators	Goal	Review Period
1. Amount of dedicated funding for transit	<b>monitor</b>	<b>1 yr</b>
2. Per capita vehicle miles traveled	<b>decrease</b>	<b>1 yr</b>
3. Annual percentage of road network with “Complete Streets” or “Context Sensitive Solutions” design	<b>increase</b>	<b>1 yr</b>
4. Traffic growth rate	<b>&lt;2%</b>	<b>5 yr</b>
5. Transit ridership	<b>increase</b>	<b>1 yr</b>
6. Wildlife-vehicle collisions	<b>decrease</b>	<b>1 yr</b>
7. Percentage of total trips along major corridors made by alternate modes	<b>&gt;10% of total shifted to alternate modes</b>	<b>5 yr</b>

### Jackson Hole Conservation Alliance comments

---

<sup>1</sup> To meet the broad intent of this chapter (as it is titled), it needs considerably more focus on all aspects of multi-modal transportation. Also, there are other important aspects to transportation, such as specific land use strategies in addition to travel behavior, that should be better integrated within the chapter. One of the three land use strategies outlined in our existing plan, “eliminating transportation demand by reducing the overall amount of residential development in the County,” which has been removed in the draft, is a specific example. This strategy needs to be reinstated.

<sup>2</sup> The statement of ideal needs to change to encompass a broader transportation vision. Friends of Pathways made a good recommendation for a replacement in their written comments, which was a statement formed through a Sustaining Jackson Hole project.

<sup>3</sup> As mentioned in point (1), this theme should address additional elements of transportation. In comparison to our community’s existing plan, in particular Chapter 8, Transportation, this new draft addresses far fewer community concerns related to transportation. For example, the first goal of our existing plan is “to systematically plan for future mobility that meets the needs of residents and tourists within the context of community character.” The new draft does not include a policy that addresses this issue of character, which has been a fundamental part of previous transportation goals.

Also, there are many environmental and energy- efficiency related issues related to transportation. If they are not adequately addressed in theme six, they should be highlighted in the new theme eight chapter on energy efficiency.

<sup>4</sup> In terms of figuring out “a way to slow traffic growth” this plan should specifically articulate the importance of continued conservation acquisitions as a transportation strategy to help reduce traffic growth, as Chapter 8 of our existing plan does. We recommend adding additional language in this preliminary section, as well as adding a specific policy. The strategy statement in our existing plan is “Facilitate conservation acquisitions including seeking funding in locations where removal of vehicular traffic from roadway corridors has the greatest benefit on the transportation system.” It should be reinstated.

<sup>5</sup> What is the 10% quantitative figure based on and why does it differ from what is in our existing plan? Is there information available on existing conditions with regard to multimodal travel shares (ridesharing, walking, biking, transit, etc.)? Friends of Pathways, as part of public comment, has made some compelling points with regard to an over-reliance and emphasis on transit as opposed to other active transportation alternatives.

<sup>6</sup> One of the key reasons the public is concerned with the anticipated amount of commercial development within the Town of Jackson and Teton County is directly related to overall traffic growth. This is why an understanding of the total projected workforce is so important (and not just a percentage) for being able to anticipate total commuter numbers. Even if we adopt a goal of housing 65% of the workforce locally, it is critical to understand 65% of a targeted figure, so that we can anticipate future transportation demands related to commuting.

---

<sup>7</sup> As we have stated, it is critical to clarify how our existing plan, Chapter 8, is going to be used moving forward. What does it mean for this chapter to be included as an appendix for the new plan? Also, it is important to understand a comprehensive picture of land-use strategies outlined in the existing plan, not just those mentioned in this sentence. For example, continued conservation acquisitions were a critical element of proposed land use patterns in our existing transportation plan, which the new draft removes.

Also, with regard to monitoring, our existing plan had much clearer guidelines for monitoring and implementation (which outlined key actions and responsibilities), as opposed to this vague sentence.

<sup>8</sup> Why does this chapter place so much emphasis on transit in comparison to other active transportation alternatives? In terms of a local context, why is transit considered “the most viable way” to achieve a significant shift? The chapter should be more clear about existing conditions and the limitations associated with alternative modes.

<sup>9</sup> In general, this chapter should more specifically address the transportation-related implications of a high visitor fluctuations in the Town and County. Different seasons pose different challenges to shifting visitor mobility into alternative modes. While there are certainly opportunities for shifting certain trips, it is important to be realistic about the actual behaviors and travel needs of visitors and plan accordingly.

<sup>10</sup> This policy needs to be rewritten. As voiced by the TAC committee, there are a number of implications that follow this land-use strategy – both good and bad. Importantly, not all “nodes” or “compact centers” or “mixed-use villages” are equal in terms of enabling effective transportation connectivity. In our community, we must be very careful about applying simplistic and basic planning theories within the unique context of this valley, which includes sensitive wildlife habitats and movement corridors, scenic vistas, extreme weather, and areas/roads that connect with or end in surrounding public lands. As we have stated, while we certainly support the concept of confined development footprints – as opposed to a sprawling and dispersed footprint - we believe the appropriate land use pattern lies in the details, including the scale and magnitude of what is proposed. Just because development has occurred in a specific geographic area before does not mean never-ending expansion in the area is the right approach.

<sup>11</sup> Multimodal travel is an important method to use to relieve traffic. However, a separate policy should be added to address the role of continued conservation acquisitions as a method to slow traffic growth. See point (4).

<sup>12</sup> As discussed in the March 23 workshops with the transportation consultants, and as outlined in our existing plan, Chapter 8, our community needs to update functional classifications and standards. Refer to Chapter 8 for specific language that should be incorporated.

<sup>13</sup> See existing plan for details on developing a monitoring plan. We are concerned that replacing the kind of detail that exists in our current plan with very brief, vague statements that are in the new draft, gets us further away from effective implementation. Creating a new plan that eases implementation is ideal, not a plan that takes us further away from what we already have.

<sup>14</sup> Why replace community character, a term and common framework that had some level of definition, with the term “community values”? While we appreciate the need to increasingly refine what is meant by community character, removing the concept altogether is a concern.

<sup>15</sup> This recommendation is important, but it is far more vague than the existing plan’s recommendations. What’s the downside of keeping a more predictable, clearly outlined set of expectations for how different agencies and organizations will work together?

<sup>16</sup> The concept of concurrent review is critical. Additional clarification of how this approach will be implemented is important for laying the groundwork for clear land development regulations. Because a comprehensive traffic analysis (based on anticipated buildout according to the proposed Future Land Use Plan) is so critical to establishing a basis for concurrent review, we are hopeful that this analysis will soon be available. Given that concurrency review is based on meeting adopted level-of-service-standards, updating these standards must be a priority.

Will this plan recommend a coordinated plan for future land use/transportation needs based on overall expected buildout, as well as a financially feasible five year capital improvement schedule?

<sup>17</sup> This sentence is confusing.

<sup>18</sup> Narrative should also be included that addresses impacts to scenic resources. The 1994 Plan includes considerable explanation about the impacts of transportation infrastructure (widened roads, etc.) on rural character goals. The language provided in this policy is an insufficient replacement of our existing plan.

<sup>19</sup> Our existing plan has much clearer objectives than what is mentioned in this policy.

<sup>20</sup> As mentioned in the March 23 workshop, and through public comment, the list of potential transportation network projects should be more comprehensive, including transit, biking, pedestrian, and wildlife-related projects. This list is highly limited.

It is important to acknowledge that the quantitative results (such as a 28% reduction at the “Y”) were based on preliminary modeling and basic assumptions that were different from assumptions used in Appendix I (or more importantly, they are not based on what the Future Land Use Plan proposes.) Prior to the plan being adopted, the source for findings and assumptions should be identified clearly.

<sup>21</sup> **In comparison to our existing plan, this chapter takes a huge step back in terms of clear strategies and policies.** The strategy section needs to be significantly reworked, using Chapter 8 of our existing plan as a guide.

<sup>22</sup> These indicators are less helpful and less specific than what are in our existing plan.

---

**In terms of meeting the objectives of this planning process - to improve the existing plan - this draft chapter falls far short.**