



Jackson Hole Conservation Alliance
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April 12, 2010

Town of Jackson and Teton County Planning Commissions
Cc: Town of Jackson and Teton County Planning Staffs
Re: Proposed Theme Eight: "Energy Conservation"
Submitted via email to Alex Norton

Dear planning commissioners and planning staff,

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to comment on the proposed Theme Eight of the draft Comprehensive Plan, "Energy Conservation." Conceptually, we fully support the writing, adoption and implementation of this proposed theme. As suggested by some of the planning commissioners in the April 8 hearing, we also support that the new theme have a broader intent to address climate change and adaptation issues.

Included below are our comments regarding this theme, the first of which pertain to the existing Principle 1.3 and related policies, strategies and indicators, followed by several comments regarding what we believe should be added to this theme.

Amendments to existing plan principles/policies: *(please refer to our comments on Theme One for more contextualized explanations)*

1. Energy conservation on a broad level is an essential goal. However, in terms of the statement in Principle 1.3 about "lower energy bills," it is important to remember that it is safe to assume that *energy costs will significantly increase once total energy demand in Teton County approaches a certain level*. While reducing energy demand per capita is a necessary and essential policy, it is clear that the amount of development proposed within this plan will dramatically increase total energy demand, and therefore energy costs, despite how much is reduced per capita.
2. Policy 1.3c: Incentives should also be provided for reuse and/or recycling of materials in existing structures prior to razing.

Questions/Additions to a proposed Theme Eight:

1. The role of climate change with regard to our wildlife populations, water quality and conservation, and economy are not yet adequately addressed in Principle 1.3. There needs to be more language specific to the Greater Yellowstone Ecosystem *within the dynamic context of a changing climate*. In addition, the policies in this theme should speak to what it means to be a gateway community committed to the stewardship of two premier national parks and one of the last relatively intact ecosystems in North America, specifically in terms of the example that we set for visitors.
2. *Conservation of energy is fiscally responsible; it is arguably the biggest cost savings measure that this community can take*. Language to prioritize energy conservation beyond land use pattern and standards for new construction should be included. We need to set aggressive energy conservation goals and then carry them forward; this could include goals for the interim while larger changes are being implemented.
3. Air and water quality are essential to the health of the ecosystem, economy and community. Any and all growth and development will negatively impact these resources, so it will be important to continue to commit to mitigating those impacts.

4. *Education of the public will be a critical component of the success of the goals of this theme.* For example, developers and contractors could receive materials and information during the building permit review process regarding best building practices (green building). The more conversation about efficiency and conservation that takes place, the more likely people are to amend their behaviors.
5. In the energy audit conducted by the JHESP, it was determined that *transportation is the number one CO2 (carbon dioxide) producer in Teton County.* In most communities across the country, buildings are the number one CO2 producer, followed by transportation. But, here in Teton County, including the airport, transportation is the largest contributor. This must be addressed in Theme Eight beyond what policy 1.3b and c mention, and be at least mentioned in Theme Six.
6. This theme should mention the concept of the responsibility of individuals and communities to act locally to reduce our impacts on the changing global climate.
7. In the creation of the indicators for this theme, it will be important to include both numerical and narrative descriptions of baseline conditions, or measurable starting points.

Thank you again for your continued work on this Plan and for your attention to these comments. We also encourage you to seriously consider the recommendations made to this body by other external groups and commissions whose exclusive, or at least primary, charge is energy efficiency and related policy considerations. In the writing of these comments, we also referred to several other community plans from across the country; we are by no means the first community to consider the incorporation of a broad definition of “energy conservation” into our community’s planning and vision document. We urge you to consider examples from other communities as well. Lastly, we applaud your efforts at including the important concepts of energy efficiency, climate responsible strategies and energy conservation into this Comp Plan. In addition to upholding the original intent to weave the concept of sustainability throughout the themes and policies, having a chapter directly related to sustainable community development will strengthen the overall Plan.

Sincerely,



Kristy Bruner
Community Planning Director



Becky Tillson
Community Planning Associate