



Jackson Hole Conservation Alliance
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July 11, 2011

To: Teton Board of County Commissioners, Mayor Barron and Jackson Town Council
CC: Tyler Sinclair, Jeff Daugherty, Alex Norton, Shawn Hill
Re: July 11 JIM Discussion of the Character District Mapping Process

Dear Mayor, Councilors and Commissioners,

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to provide comments on the next important phase of the ongoing Jackson/Teton County Comprehensive Plan rewrite – the “Illustrating Our Vision” Section. We are basing our comments on the information provided in the staff report for the “Character Districts Scope and Fee for Professional Services.”

We would like to reiterate our goal of ensuring that this process is highly participatory and includes meaningful public input, which are vital to helping us develop well-designed plans for the future of Jackson Hole. To achieve that goal, we need to review the timeline of events to make sure that the public is given enough time before each meeting to review materials and provide well informed comments. It will also be important to review the structure of each meeting in the process to facilitate meaningful input by the public.

We recognize that many of the details of this process will be worked out in the upcoming months and we request that you consider our input as your plans are refined. The Alliance will assist in the next phase by working to increase informed involvement for the public.

Our detailed recommendations are included below, and we appreciate your careful consideration of our input as you design the next phase of the planning process.

Trevor Stevenson
Executive Director

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Form and Content of the Character District Section

Data Compilation

In the recent report “Technical Analysis of Jackson/Teton County Comprehensive Plan,” Alan Richman provides the following statement related to the Character District section of the plan:

“So the stakes for the upcoming character district mapping process could not be higher... Completion of the character district maps is an essential part of this Comprehensive Plan. The initial step in the mapping process should be a rigorous analysis of the amount and locations of development that are proposed to be reduced in conservation areas and an equally detailed analysis of the areas proposed for increased development as complete neighborhoods. In other words, the maps need to be more than a pretty picture of a planning concept.”

Based on the information provided in the scope of work, it is still unclear to what extent rigorous analysis will be used to inform the creation of the Character Districts. We urge you to recognize that many members of the public are looking to this next phase of the process to provide more predictability and specificity than the policy section of the plan currently provides. However, in order for this section of the plan to do this, and to do so in a positive, informed manner, it will be important to conduct thorough, analyses of the NRO, SRO, and the cost of growth at both the individual districts and valley-wide scales. Without these analyses, it is difficult for the maps to be more than “pretty pictures.”

By the August JIM, we hope that you will commit to initiating strategies that would benefit the Character District mapping process, such as the creation of a task force to explore potential transfer mechanisms.

We are pleased that information will be compiled and incorporated during the month of July. As part of this effort it will also be important to acknowledge data gaps, and possible implications of those gaps in terms of future planning decisions. In our June 24 correspondence, we highlighted several data inquiries that we believe should be immediately initiated:

- Collecting the best available wildlife science that can inform policies and maps
- Assessing the cumulative impacts of development on wildlife
- Identifying key scenic resources
- Determining which transfer mechanisms might work in Jackson Hole
- Identifying growth boundaries that would inform the maps

Also, in the case that information is outdated, or is lacking, it will be important for this plan to take a precautionary approach and err on the side of caution when proposing new development-based “enhancements” to planning districts.

Illustrating our Vision – Including Individual District and Countywide Scales

The final Character District Section should include a component that addresses the comprehensive picture of the valley, and not just focus on depictions and descriptions of individual districts. For example, the April 2009 Future Land Use Plan did not include an overall, comprehensive map of the county demonstrating how different districts are related at a broader level, nor did it illustrate a comprehensive depiction of the various town districts. The districts were only depicted individually, which detracted from an overall comprehensive look at the community vision.

This comprehensive look is a critical component of a comprehensive plan. It is important to understand that all areas or “districts” are strongly interconnected in terms of planning at the valley level. What happens in one location has implications for planning issues in other locations. Specifically, impacts from development are direct, indirect and cumulative; all of these impacts must be considered when evaluating suitable locations, amounts and types of new development. Overall, this concept of interconnectedness among planning districts must be strongly upheld within the maps and narrative of the new section of the plan.

Re-engaging the Public

The proposed scope of work includes a number of opportunities for public involvement. In order to maximize effective public engagement during the community's review of this section of the plan, it will be important to prioritize the following issues and either provide clarifications or make changes to the proposed work.

- *Additional information should inform improvements to policies*

The creation and review of the Character District section of the plan constitute the test of how well the policies and vision can be implemented. At the most basic level, a plan must be clear and its implementation must be feasible. It will be important to allow time for the planning team and the public to learn from this next phase of the process and to make suggestions for how the policies section of the plan could be adjusted based on additional information, prior to final adoption. Although the elected officials spoke to their intention to do this in the last JIM meeting, this component is currently not described as a potential need in the scope of work, and should be added. Overall, the scope of work should build in time to make final adjustments to not only the Character District section, but also the policies section to create an overall better plan.

- *Clarification of the Expectations of JIM #1 with regard to public input*

The scope of work states that the planning team will facilitate a JIM in August to "confirm the consistency of the preliminary character district boundaries, descriptions and classifications..." If public input will be accommodated in JIM #1, materials describing these preliminary boundaries and descriptions should be provided to the public well in advance – at least two weeks before the meeting. In general, it would be helpful to clarify the elected officials' intentions for desired public input at this stage of the Character District review process.

- *Sufficient notice of the schedule of specific dates and times of public meetings and open houses*

Many of the opportunities for public involvement include either condensed meetings in one week, or within one day. In order for the public to plan ahead to participate, it will be important to have the schedule of meetings confirmed early in the process (at JIM #1) as well as a specific description of what will be presented and discussed at each meeting. This is particularly important given that critical meetings are scheduled for November and December, a time of year when many residents are not in the valley.

- *Sufficient opportunity to provide written comments after information and new draft materials are presented during meetings*

If the planning team plans to utilize community workshops as a way to initially present materials to the public and to gather input, it will be important to allow for two weeks for the public to absorb the information presented at the community meetings and respond via written comments. Based on the scope of work, it is clear that the planning team intends to rework materials for subsequent phases based on public input from these meetings. However, prior to revisions by the planning team at all phases, it will be important to accommodate diverse methods for input, over a long period of time, given the public's diversity in schedules.

- *Sufficient Consideration of Previous Public Comment*

In Fall 2007, Clarion Associates initiated what appears to be a similar workshop process on character identification and preferences for future development in specific areas of the town and county. Considerable public input was gained as part of these meetings; it is important to include this previous input as the planning team works to define the new character districts.

- *Sufficient opportunity for public review of final document (Vision, Common Values, and Achieving our Vision)*

Prior to final adoption of the new plan in its entirety, the public needs a minimum of three weeks to review all sections of the plan. In the most recent phase of approving the policies section of the plan, the Alliance believes that the public should have been given more than one week to review the final draft prior to formal action by elected officials. It is unclear how the

proposed schedule for January could accommodate all of the scheduled hearings as well as adequate time for public input and subsequent modifications.

- *Additional Public Hearing*

We appreciate that the proposed schedule for January 2012 includes two public hearings in January 2012, one with the joint planning commissions and the other with elected officials. The process, and the product, would also benefit from a larger public hearing prior to January. This would serve as an opportunity for citizens to gather with a countywide vision in mind, testify for the public record and hear from one another sometime during the process other than the final meetings.

In conclusion, the Conservation Alliance looks forward to the upcoming stage of the process and anticipates significant opportunities for dialogue among members of the public and decision makers. We will continue to encourage public involvement during this important time for our community.

Thank you for your close attention to these suggestions and always feel free to contact the Alliance with any questions.