



December 29, 2011

To: Teton Board of County Commissioners, Mayor Barron and Jackson Town Council, Teton County Planning Commission and Jackson Planning Commission
CC: Town and County Planning Staffs, Bruce Meighen
Re: Draft Comprehensive Plan Character Districts

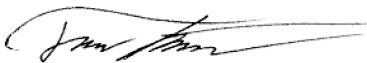
Dear County Commissioners, Mayor Barron and Town Council, Town and County Planning Commissioners and Planning Staffs,

Thank you for the extraordinary amount of work that each of you has put into the Comprehensive Plan and Character District Mapping processes. As we near the conclusion of this public process, we are appreciative of your commitment to the community's goals and values. To assist in this process, we would like to provide you with some detailed feedback on the draft Character District Maps that were released in early December.

Attached is a memo that highlights some of the principal concerns, questions and recommendations that we have about the Character Districts maps overall, as well as some thoughts on many of the individual districts and subareas. Also highlighted are areas that we believe the Character District Maps cover quite well.

We look forward to continuing to engage in the Comprehensive Plan process in the coming months and working towards a product that the community can embrace. Thank you for your work.

Sincerely,



Trevor Stevenson
Executive Director



Becky Tillson
Wildlands and Community
Planning Associate

Comprehensive Plan Character District Maps: Overall Comments

There are several overarching questions we have about the Comprehensive Plan Character Districts, and we have identified some topics that could benefit from additional analysis and exploration. Broadly, our primary concerns are outlined here along with recommendations that we think will improve the final product. Many of these broad concerns and suggested actions also apply to many of the distinct character districts. More specific comments and recommendations about each of the districts that are not covered in the broader points are included in the next section of this report.

Implementation Plan and Regulations:

An Implementation Plan will be a critical component of the finished product, set for adoption in April. We have made several recommendations in our November 30th letter and report with regard to this Implementation Plan, and specifically with regard to the Character Districts. There are several additional issues that warrant consideration.

There are many sections of the Illustration of Our Vision document that implicitly call for specific regulations to be developed. The forthcoming Implementation Plan should prioritize these regulations so that they are developed and implemented as soon as possible.

Examples of such regulations include: agricultural exemptions, density transfers (some districts mention strategies that appear to be district specific, some countywide), clustering tools, mitigations, building permit timing allocation systems, definition of local convenience commercial, lot consolidations and associated allowances, minimum and maximum lot and structure size, wildlife protection standards (fencing, ponds, etc), among many others.

Second, as part of the Implementation Plan, a feasibility study for START should be executed. For example, the Character District descriptions mention bus service to Kelly, but without the relevant data we cannot be sure that that is a realistic goal given the small population and relatively remote location.

Shifting Development Patterns:

One of the primary tenets of the Comprehensive Plan is the goal of directing development potential from the rural areas in the County to the Complete Neighborhoods, identified in the Character District descriptions. The question remains, how will we achieve this shift? It is important to answer this question as soon as possible to let the community know what they can expect from future development and conservation efforts. Without knowing how this shift will take place, the goal is merely aspirational and leaves us without any answers. This past fall, the Alliance brought Mark White to Jackson. Mr. White is an expert on regulatory tools to shift development patterns, and suggested several approaches that are suited to our particular community. The timeline for acting on regulatory tools should be outlined in detail in the implementation plan.

That said, the Illustration of Our Vision section covers quite well the locations and types of development increases throughout the valley. However, the opposite side of the equation, the decreases, are not as well described. Often, they come couched in the goal that with redevelopment of certain areas, density and intensity of development will be decreased. This may discourage reinvestment and redevelopment, and is not satisfactory as the primary tool for decreasing development in undesirable areas. This decrease must be clarified and described such that the community can understand where development will not occur in addition to what the maps lay out as places suitable for growth.

Recommendation #1: Within the implementation plan, create a clear timeline to explore and implement regulations that can meaningfully shift development patterns.

*Recommendation #2: In the Character District Maps, provide a better description of where **decreases** in development are most desirable, rather than focusing primarily on where **increases** in development are planned.*

Amount of Growth:

Additionally, the community has asked repeatedly for numbers associated with the proposed development pattern in the Character Districts. In fact, the introduction to the Illustration of Our Vision section states “the community is committed to continually adapting our implementation strategies to ensure that preservation and development occurs in the desired amount, location and type.” This is laudable goal, but without a more accurate estimate of the amount of development that is desired or expected, it may be an unachievable goal. The community was told that the numbers would fall out of the mapping process. The commitment to a rough doubling, the 60/40 split and the goal of housing 65% of our workforce locally are good starts, but are not sufficient. This section should also clarify what “rigorous analysis of our successes and failures” means with regard to implementation of our goals.

Recommendation #3: Provide estimates, on a district level as well as a countywide level, of the approximate amount of residential and commercial development that can be expected from this Plan.

Recommendation #4: Clarify that the overall amount of growth is not to exceed what is currently entitled, and demonstrate that the plan is working towards this goal by providing rough projections for each district.

Recommendation #5: Clearly define the “rigorous analysis” that you anticipate doing.

Wildlife Impacts and Considerations:

A rapid assessment of the projected wildlife impacts of the development pattern illustrated in the Character District maps should be completed and incorporated into the maps section prior to adoption, and perhaps some changes should be made to the maps depending on the outcome of the assessment. With this, we can begin to understand the impacts of our desired development amount, type and location on our area’s wildlife.

Wildlife permeability in new and existing development needs to be an even stronger consideration throughout the Plan. Certain districts, like the Town Periphery, cover the idea quite well while other areas would benefit from more explicit commitments to wildlife permeability. Many areas in our community, even in Town, are within or adjacent to wildlife habitat and public lands. Buttes, riparian areas, and more broadly, open spaces, provide important wildlife habitat. Development that occurs in or near these amenities must account for wildlife movement and the resulting regulations for these areas, when they are written, must also respect wildlife permeability.

Recommendation #6: Execute a rapid assessment of wildlife impacts of the proposed development pattern, or authorize the Natural Resources Technical Advisory Board to do so.

Recommendation #7: Insert more explicit considerations for wildlife permeability in the following districts: 2, 3, 4, 5, and 13.

Predictability:

The document as a whole needs an increased focus on actual predictability. For example, on the page “What Does the Illustration of the Vision Address,” point number 6 suggests a lack of predictability, whereas it is

one of the central tenets of the Plan according to the introduction. Further exploration into this idea is warranted. Additionally, without estimates of the amount of development proposed, this plan lacks the predictability it aims to achieve.

As we explained in Recommendation #3, we recommend that you provide estimates, on a district level as well as a countywide level, of the amount of residential and commercial development that can be expected from this Plan.

Prioritization:

The first page of the Illustration of Our Vision references ensuring “that all policies of this Plan are implemented in the context of our Vision and no policies are forgotten.” It is important at this point to clarify that the community values enumerated in the Vision are prioritized.

Recommendation #8: Clarify the language to prioritize the community values as the policies do.

Definitions:

The definitions of areas of stability, transition, preservation and conservation are helpful and indicate a commitment to achieving community goals.

The gradient on the page entitled “Character Defining Features” is a key component of the Plan, and needs to be improved upon. The “clustering” image should better illustrate allocation of open space, as the current image implies a landscape dominated by structures with very little open space. Also, it will be important to clarify whether clustering tools will be available on parcels smaller than 160 acres; a formal review of the Planned Residential Development (PRD) tool, as well as other density shifting or allocating systems would help to answer this question.

Recommendation #9: Correct the misleading graphic of “clustering” on the gradient map.

Recommendation #10: Determine how to best review the results of the PRD tool, and include a timeline for this review in the implementation plan.

Costs of Growth:

Recommendation #11: The costs associated with the growth described in the Character Districts should be addressed in the introduction to the Illustration of our Vision section. Growth must pay its own way, and the direct and indirect costs of development must be considered.

Enforcement:

Recommendation #12: The introduction to the Illustration of Our Vision section should mention the importance of enforcing as strict as possible adherence to the intent of the district maps.

Recommendation #13: The introduction should clarify that the transition zones between character districts should not cause incremental encroachment of the character of one district into a neighboring district. In other words, character district descriptions should be closely adhered to, regardless of the character of a neighboring district.

Comprehensive Plan Character Districts: District Specific Comments

District 1: Town Square

The Alliance has no comments to provide on this district, as it is not as closely related to our areas of expertise.

District 2: Town Commercial Core

- a. *Recommendation:* In the diagram on the first page of this district, we should aim to make “viable wildlife habitat and connectivity” a “half circle” in the future column, and clarify that enhancements to Flat and Cache Creeks should be explicitly ecological.
- b. It will be important to ensure that excessive lodging not overwhelm housing and other commercial development in this district.
- c. *Recommendation:* Flat Creek corridor enhancements in this district should be focused primarily on ecological enhancements, and setbacks and other considerations should be explicitly mentioned in this chapter. Future enhancements should focus on the creek as a community amenity that prioritizes scenic and ecological values over recreational opportunities.
- d. *Recommendation:* Section 2.2 should include a commitment for new development in this area to take into account existing neighborhoods and work to integrate into them rather than overtake them with inappropriate bulk and scale.

District 3: Town Residential Core

- a. *Recommendation:* In section 3.5, the statement “parking should be minimized” should be replaced with “surface parking should be minimized.” This leaves more options for other approaches to dealing with parking.
- b. *Recommendation:* Also in section 3.5, the reference to “some limited local convenience commercial” should be more tightly defined. You may be referring to the often-discussed idea of a small grocery store, but “convenience commercial” could mean a wide range of other uses.

District 4: Mid Town

- a. We are very supportive of the references to natural resource values in this district
- b. *Recommendation:* In section 4.2 it would be helpful to add a statement with regard to keeping bulk and scale down. We are also supportive of a wildlife crossing in this sub area.
- c. *Recommendation:* In section 4.5, the last sentence should be amended to read, “Moving forward, wildlife needs will be prioritized over recreational amenities in this sensitive location.”

District 5: West Jackson

- a. *Recommendation:* Section 5.2 should be amended to recognize that this area is already trending towards housing and complete neighborhood attributes, and should be encouraged to continue to do so, given the close proximity to schools, a grocery store, pathways and Flat Creek. This is an ideal location for “complete neighborhood” attributes, but given recent developments, it is no longer a particularly good location for industrial uses. Industry should be focused into District 7.
- b. *Recommendation:* Section 5.4 should commit to repurposing High School Road primarily as a residential access road and not a highway.
- c. *Recommendation:* Section 5.6 needs to be clarified with regard to the lower priority of development in northwest South Park. We are supportive of efforts within the Growth

Management Plan to proactively allocate development to certain areas of the County before others.

- d. *Recommendation:* In section 5.6 there is mention of a “neighborhood planning effort.” This term must be better defined to include plans for roadways, public areas, pathways and other components of development in such a large area. The neighborhood planning should happen prior to accepting any development proposal, and should include a rigorous review of any major development application by the public and the elected officials, beyond that required by an ordinary development application. This is extremely important given the large scale of proposed development in this area.
- e. *Recommendation:* We believe that the intent of the development in section 5.6 is that this area will be developed more intensively *in exchange for* eliminating development rights on the open lands in the South Park area. This should be stated explicitly. Otherwise it implies a massive upzoning of this area while still permitting at least 1 unit per 35 acres in the rest of South Park. Our understanding is that the PRD or other transfer tool is envisioned to conserve the open space, and that the development in 5.6 is seen as the best place to concentrate development to achieve that goal. Please clarify this so that this can’t be read as an upzone in addition to already existing rights on the open space you’re hoping to preserve.

District 6: Town Periphery

- a. We are supportive of the mentions of wildlife corridors and permeability in this district.

District 7: South Highway 89

- a. *Recommendation:* In section 7.1 we have to be sure to plan so that we can fit the light industry in this district and not focus excessively on this as a mixed-use area, in an effort to keep light industry from overlapping into other districts. Since we are recommending that the Gregory Lane area transition away from industrial use in the future, we would need to be certain that we can accommodate all future light industry needs for the county within district 7. This might mean less emphasis on residential use in 7.1.
- b. We are supportive of the wildlife considerations in section 7.2
- c. *Recommendation:* In section 7.2 it will be important to clarify that habitat concerns trump scenic concerns. That is, development in this area should be predicated on finding a place with less wildlife impacts not on finding a place with less scenic impacts.

District 8: River Bottom

- a. District 8 is excellent overall. In particular, we support the emphasis within 8.3 on future redevelopment being designed to enhance scenic and wildlife values of the area.

District 9: County Valley

- a. We are supportive of the mentions of both wildlife crossings and wildlife permeability in this district.

District 10: South Park

- a. We are supportive of the important recognition of scenic values as well as open space and wildlife values in this district.
- b. *Recommendation:* The description of this district should also identify important East/West wildlife corridors as areas that should be protected.

- c. We are supportive of the wildlife focus of Flat Creek, as it is not a suitable area to prioritize recreational amenities.
- d. *Recommendation:* This section should clarify that pathways are more suitable than roads to achieve interconnections between the various neighborhoods in South Park.

District 11: Wilson

- a. We support the limited growth in this district, as well as the recognition of wetlands, wildlife values and community character.

District 12: Aspens/Pines

- a. *Recommendation:* Please clarify that there should be no increased commercial development on the east side of highway.

District 13: Teton Village

- a. This district description is particularly aspirational, specifically with relation to the needed amendments to the Resort Master Plan. How will this take place?
- b. *Recommendation:* This district should include explicit mention of the goal to ensure that future commercial development serves the resident population at the Village and does not generate additional vehicle trips. Without immense increases in the local convenience character of current and future commercial development in this district, the residential development will merely generate a significant number of trips on the already busy Highway 390.

District 14: Alta

- a. This district description is good overall.

District 15: County Periphery

- a. *Recommendation:* In the diagram on the first page of this district, it seems that natural scenic vistas warrant a completely filled in circle in the existing and future columns.
- b. We are supportive of the focus on scenic values in this district.
- c. *Recommendation:* This description should clarify that the transportation goals are centered on improving existing roads and access points and not building new ones.
- d. We are supportive of and encourage environmentally sensitive roadway design.
- e. Section 15.2 says “future development will be clustered in and around existing neighborhoods.” Since we believe that the intention is not to expand the neighborhoods within each of the four areas identified as 15.2, some clarification is needed. Otherwise this could be read as creating new “nodes” within these rural areas, especially since the maps also show “Workforce Housing” as a goal within each area of 15.2. If possible, it is probably preferable to shift development totally away from District 15 and into Complete Neighborhoods and section 15.2 should probably say something to that effect. Of course, we would need some new regulatory tools to enable that sort of shift to take place, as we have said before.