

JACKSON HOLE CONSERVATION ALLIANCE

TO: Alex Norton
FROM: Kristy Bruner, Community Planning Director, Jackson Hole Conservation Alliance
DATE: 5/22/08
RE: Preliminary Comments on the Preferred Plan Themes & Policies Outline

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to comment on the recently presented outline of themes and policies. At this point, we would like to make a few preliminary, broad comments prior to the release of the full draft Plan. Upon review of the full draft, we will make more specific comments.

Overall, while recognizing that we are still in a "preliminary" stage, we think this last round of meetings did not adequately present a plan that truly reflects a comprehensive public opinion or strong planning principles. While the draft policies and preferred land use plan include many positive elements, we believe they have missed the mark on several fundamental issues. That said, we recognize that this part of the process can be quite difficult for all involved, as the discussion is transitioning from broad concepts to detailed "lines on the map" and specific policies. This transition is understandably challenging. In general, many of the "big picture" ideas are mentioned, but are not necessarily reflected in the elements of the Plan. Without detailed elements laid out, it is challenging to evaluate even a range of consequences that would result from the preferred plan and policies.

Below, we will summarize key areas of concern:

- ***Evaluations of real consequences of proposed scenarios have been inadequate or absent***
In a nutshell, the "plan" appears to have resulted from analysis on development patterns only, rather than a comprehensive analysis of overall intensity of development and all its associated consequences. Consequences include wildlife population viability, traffic capacity, fiscal impacts, character preservation, etc. It appears that much of the plan simply shifts density, at high levels, to primarily South Park and Town. Of concern are repeated assumptions about "tradeoffs" that have been inadequately explained and inappropriately assumed. For example, it has been stated that the "Plan" will succeed in protecting wildlife through development patterns, which at the general concept level has merit. Development should be patterned in a way that protects functional open space and habitat. However, given the seemingly high densities proposed in "development areas", the impacts of overall intensity and extent of development (i.e., build-out) on wildlife populations throughout the valley appear to have not been considered in a meaningful way.
- ***Identification of "Conservation Areas" appears to underestimate, and exclude, important areas for wildlife***
Currently, the Plan proposes to focus conservation efforts in Buffalo Valley, Kelly and Alta. While this is a positive element, it seems to ignore, or underweight, the distinct ecological function of other parts of the valley, including the Snake River corridor and lower elevation areas. It is unclear what level of protection is being proposed for these other areas, and whether or not the NRO will be modified to have more teeth. Back to concerns with overall density, there are currently areas in the heart of the valley that are developed, but are developed at an intensity that enables use by wildlife. If density is allowed to increase in these areas, the landscape may no longer be permeable for wildlife, which could have major repercussions on populations.

Additionally, it is critical to recognize that as development patterns and intensities change

The Jackson Hole Conservation Alliance is dedicated to responsible land stewardship in Jackson Hole, Wyoming, to ensure that human activities are in harmony with the area's irreplaceable wildlife, scenic and other natural resources.

throughout the valley, wildlife use in areas will also change. Areas that are not currently considered “critical habitat” or “natural resource areas” may become more important through time as wildlife are displaced from other areas, as overall connectivity is degraded, and even as vegetation types shift as a likely result of climate change.

Even though “stewardship of wildlife habitat and other environmentally sensitive areas and resources” is listed as a major theme, it is unclear to what extent policies will be able to support achieving these goals. For example, in the outline, there appears to be no mention of commitment to monitoring natural resources, which would need to be a key component of effective stewardship.

- ***Alternative fails to include a sufficient consideration of build-out numbers and population capacity***

Planners didn’t provide a clear picture of build-out, nor emphasize the importance of analyzing issues of population capacity. There needs to be a venue for discussing how many dwelling units are appropriate for the valley. Throughout the process, both elected officials and the public have voiced the need to look at alternatives under different build-out scenarios (and their consequences on traffic, wildlife, etc.). To date it has not occurred. When will this occur? It is clear that a majority of residents want limited population growth, but the alternative doesn’t reflect this and certainly doesn’t provide a means of achieving such a goal.

- ***Policies appear to fail to address the high level of commercial potential and associated consequences***

In addition to employee generation within planned resorts, the plan still contains a high level of additional commercial potential. Given the issue of affordable housing, and our increasing backlog, there should be greater focus on reducing the demand for affordable housing. Reduced commercial potential (or shifting zoning from commercial to residential potential) is a direct and effective way to curb this demand for housing. The extensive area proposed to be “mixed-use” in Town is a concern. The concept appears to be misapplied by elevating increased commercial potential in districts where it is not appropriate.

“Mixed-use” can take many different forms at the detailed level. What is critical is the **proportion** of uses with these proposed districts. For example, “mixed use” in many areas simply signifies that an **area or neighborhood** has a certain degree of mixed-use. However, based on the mixed-use categories proposed in Town, it appears that “mixed-use” is defined at the level of **individual structures or developments**. This appears to translate into significant growth in commercial and office space. In this case, these details must be transparent for an adequate evaluation. Varying proportions of mixed-use will have radically different effects; therefore any thorough evaluation of the Plan must consider the details. “Mixed-use”, and all the ranges of meaning the concept can carry for different individuals, should be clarified. Without careful consideration and discussion of the details during the Comp Plan update process, we as community will fall short in making the Plan more predictable.

- ***Alternative presents high densities, but with minimal guidelines for proportions of housing categories (workforce versus market)***

Of particular concern are the proposed densities without specific guidelines for housing types. For example, it seems that many individuals that support higher density support it for the cause/benefit of workforce housing, not for the sake of density alone. However, at this point, it appears that elected officials, in particular of the Town, are lagging behind in enabling growth to adequately contribute to securing housing for the workforce.

- ***Policies do not address the effect of cumulative impacts of development***

In order to protect wildlife habitat, natural systems, etc. at a *functional* level, a means for addressing cumulative effects is essential. Our community could protect certain areas of open space (i.e., at a structural level), but fail overall to protect the ecological function of the valley.

Additionally, principles such as “improve air quality” need to be specifically defined. Is the goal to improve air quality per capita, or at a broader community level? If it is to maintain quality overall, then certainly the extent of allowable development will affect that goal, even if multi-modal transportation systems are in place.

- ***If a “predictable level of build-out” is to be achieved, inconsistent policies (such as discretionary incentives and regulatory measures) have to be better defined.***

In conclusion, many elements of the preferred plan are positive, and we appreciate the work that has gone into the process to-date. We also recognize that the current transition from “big ideas” to “specifics” is challenging. That said, the preferred plan failed to address issues of capacity for development, and the linkages between “allowable development” and actual consequences. In general, the plan appears to accommodate high population growth (based on density options and not baseline zoning) without a strong analysis of how this population level will influence the community’s consistently voiced top two priorities: protecting wildlife and managing growth responsibly. The plan could work to exacerbate community challenges by enabling drastically increased densities, without having a plan to “fix” and mitigate the effects of development that has already occurred, or that is in the “pipeline”. *This plan cannot be just a question of where development should be directed; it must also be a question of capacity (how much) and of what type (character and function). To date, the question of appropriate quantity, which is a very important one, appears to be underemphasized throughout most of the major themes presented.* In general, the big idea of “reduced development potential” should be stronger in the major themes, guiding principles and policies. Not only will this reflect public opinion, but it also makes sense from a planning perspective. If Jackson Hole is to achieve its goal to be a stewardship-based gateway community to a global treasure, it must address the consequences that human population growth can have on both the private and public lands of Jackson Hole.

Thanks for your time. We look forward to continued discussion on the details, as one of our main hopes for this Plan is increased predictability. Without careful consideration of the details during the Comp Plan update process, we will fall short in making the Plan more predictable.

THANKS FOR YOUR WORK!!!

5/29/08

Re: Comprehensive Plan Update

Dear Town Council and County Commissioners:

Given our commitment to strong land use planning and upholding community vision, the Jackson Hole Conservation Alliance, Save Historic Jackson Hole and South Park Neighbors respectfully request that the Preferred Plan and outline be revised to better reflect public comment. Not only does the Plan (for future land uses) not reflect public comment, but it also appears to have been presented without adequate analysis of real consequences on key community issues – transportation capacity and infrastructure limitations, fiscal impacts, long-term wildlife population viability, character preservation, and exacerbation of workforce housing shortages. In a nutshell, why are we at a stage of having a “preferred plan” that is, first and foremost, not based on community preferences, and second, not based on planning analyses that would deem the plan a “preferred” means to carry out the wishes of the community?

Many members of the public are confused and frustrated. Clarion Associates was in Town in January and collected public input. Public polls continued for months. These polls and surveys have been readily available. In many fundamental issues, public opinion regarding the future of Jackson and Teton County is clear, consistent and convincing. Why does this preferred plan differ so significantly from public input (and in many ways, from the guiding principles outlined by Clarion)?

When the consultants were asked this question, the answer given was "We haven't gotten to that level of detail yet." That was a troubling response. It helped to fuel the fire of concern and accusations that the process is not transparent. Clearly, there is enough detail in the plan right now to determine that the preferred land use plan is in conflict with public input. For example, why are the plan's “big ideas”, particularly “reduced development potential,” not implemented through land use categorizations?

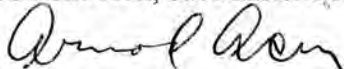
The consistency of the several Comp Plan polls conducted and the disparity of those poll results with the draft preferred plan assembled by Clarion should not be ignored. Confidence in the planning process should be restored before we proceed. We ask that a revised “preferred plan” and outline be released that better reflects the legitimate wants and needs of Teton County residents. Without getting this critical first step “right,” we will head in the wrong direction – one that does not benefit the community.

We respectfully request that the Town Council, the County Commissioners and Clarion Associates conduct meetings during which the basic disparities between the public sentiment and the draft plan can be discussed. As part of those meetings, we would like to participate and present our concerns. If this is done fairly and openly, it will result in enhanced public confidence in the planning process.

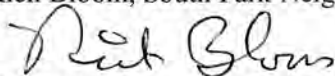
While our organizations have different missions, we collectively advocate for a revised comprehensive plan that represents community sentiment and that promotes planning approaches that respect the rare context of Jackson Hole. We appreciate your consideration of this request and look forward to your response.

Respectfully,


Armond Acri, Save Historic Jackson Hole – anacri_wy@msn.com



Rich Bloom, South Park Neighbors – rich.bloom@bresnan.net



Kristy Bruner, Jackson Hole Conservation Alliance – kristy@jhalliance.org



June 11, 2008

Jackson/Teton County Planning Departments
Attention: Alex Norton, Project Coordinator for the Comprehensive Plan Update
200 S. Willow
Jackson, WY 83001

Subject: Save Historic Jackson Hole Comprehensive Plan Update Comments

Dear Alex,

Thank you for the opportunity to participate in the Stakeholder's Advisory Group (STAG) for the update of the Jackson/Teton County Comprehensive Plan. As the representative for Save Historic Jackson Hole, I offer the following comments on the process and conclusions to date.

Overview of Jackson and Teton County – Unbridled growth has negatively impacted the Jackson/Teton County Community since 1994 when the last plan was published. Teton County has grown faster than over 98% of the counties across the nation according to the 2000 census, and that super-high growth rate doesn't appear to have subsided. We find ourselves saddled with traffic jams, unaffordable housing, and a backlog of approved but unbuilt projects that assure a continued near term super-high growth rate, even if no new approvals are granted. Our community suffers as the 'last of the old west' disappears.

The following observations are offered and hopefully the updated plan will solve the growth rate dilemma:

1. The issue is growth, not buildout. Growth is misunderstood. We confuse "buildout" which is a population snapshot at some future time, with growth, which is the rate of change of population with time. Buildout maps identify where future populations will be located but they say nothing about the rate at which we add either residents or workers that commute.
2. Growing too fast is damaging to a community, and growing faster than 98 % of the 3,141 counties across the nation is growing much too fast. Emergency action should be taken to slow the rate of growth of the resident population, the visitor/tourist population, the commuter work force population, and the second home owner. Growing at our extremely rapid pace assures unintended consequences and imbalances. Our traffic jams, super-high housing prices, and huge commuter work force are cases in point.
3. A narrative and map should be made to paint a "layman's picture" of what the valley will look like and feel like at build-out. Buildout maps alone, without this descriptive picture, will provide false comfort and be a disservice. Take traffic for instance, people need to understand where roads will be located, how many lanes they will have, where the traffic lights will be located, etc. Asking the public to approve buildout numbers without telling them what those numbers mean to the community will only yield an "uninformed response," meaning nothing.

4. Density of real estate development is part of the growth issue. With high density of unrestrained real estate development, we get rapid growth. All types of land use are involved in density: single family use, multi-family use, commercial use (with lodging being the dominant commercial use speeding growth), industrial use and mixed use. This includes bulk and scale, setbacks building height and number of stories. Careful decisions pertaining to land use must be exercised in the Comp Plan update to see that land use density is either reduced from, or equal to, the densities that are currently planned.
5. Everything that is happening in Jackson Hole is too big and too fast to maintain a sense of community, to maintain community character, to preserve wildlife habitat and open space.

Status of Comprehensive Plan – Save Historic Jackson is a strong supporter of the existing Comprehensive Plan and comprehensive planning in general. Currently we have a good comprehensive plan, but the language in the plan is weak at times and at other times unclear. We support a clear, strongly worded Comprehensive Plan that gives citizens, property owners and developers alike predictable property rights and a predictable future for the County.

Population – The population figures released in the report from October of 2007, estimated buildout at approximately 31,000 under current zoning entitlements. Save Historic Jackson Hole submitted a detailed Memo on January 11, 2008 that was intended to add refinement and accuracy to the data presented. Clarion and Associates, to their credit, responded professionally and expeditiously. The results of their fine-tuning yielded a buildout figure of approximately 39,000 people.

Keep in mind that SHJH did not question any of the assumptions made in creating the data. If we had questioned the assumptions, the buildout numbers could have been significantly higher. For the record, we do not agree with many of the assumptions made in the creation of the data. For example, we do not agree with the assumption that property will be developed at 80% of its potential. The County Planning Staff concluded that 80% was the correct number because of an internal survey done between 2000 and 2005. Land prices have increased markedly since that time. The trend that we see is for developable properties to request 10-fold increases in density.

The primary concern is that population at buildout and the rate of buildout under current zoning needs to be reasonably accurate and regulated or the Comprehensive Plan update will not be meaningful. The Plan update should reflect the maximum buildout when the update is finished. The Plan needs to be built upon a solid foundation of reliable data. A plan built upon faulty data is useless and is not a plan. It is nothing more than wishful thinking about a desired (but unachievable) outcome.

Buildout – The Comprehensive Plan should include strong language regarding buildout and rate of growth. The current plan does not make any such statements although it is strongly implied by the fact that there was a county-wide down-zoning shortly after the current comprehensive plan was adopted. One of the glaring deficiencies of the work done so far on the Comprehensive Plan update is a lack of recognition of tourism and its impacts on services and traffic. Tourism

more than triples our population in the summer. Buildout should include lodging units in the calculations but does not currently reflect this population.

Zoning Districts – A Buildout number is meaningless unless the flexible and floating zoning districts (FZDs) are removed from the Comprehensive Plan and the Land Development Regulations. As long as these zone districts exist, it is impossible to comply with a buildout number. By “flexible” we mean that there are little or no standards for density, building height and sometimes land use. By “floating” we mean they have no specific location identified in the Comprehensive Plan. All FZDs must be eliminated from the LDRs and the first step toward elimination is strong language in the Comprehensive Plan that identifies FZDs as in conflict with the goals of the Comprehensive Plan and our citizens. Developers nearly always view FZDs as an opportunity to ask for an up zone and the up zone usually gets approved. FZDs also create controversy between the public and the developer with the City Council or the County Commissioners being the referee. Negotiations for these controversial developments often take numerous meetings over an extended period of time, sometimes two to three years. The developer in recent times sets out to seek an up zone with a cadre of experts including but not limited to an attorney, professional planner, professional marketer, biologist, landscape architect, wildlife expert and others that are advocates for the developer. This leaves the Council or the Commissioners to negotiate with the developer and their “experts.” This process is very confrontational and finally leaves the desires of the public completely out of the final decision.

The following is a list of those zone districts and their associated shortcomings:

1. Planned Resort District (PRD) – The PRD is both flexible and floating. New resorts can be proposed anywhere in the county. Densities and building heights are flexible as long as the developer can get approval of the Master Plan.
2. Planned Mixed Use Development (PMUD) – The locations of the PMUDs within the Town are somewhat fixed, however the densities and floor area ratios are much more loose and unpredictable. The PMUD tool can grant 25-50 percent increases in floor area. It also grants the ability of developers to build four story buildings. Four story buildings are clearly against the wishes and desires of the public as indicated in both the SHJH and UW polls.
3. Affordable Housing (AH-PUD) – This tool is one of the most egregious of all. The problems of the AH-PUD zone have been demonstrated by Osprey Creek and Teton Meadows Ranch development proposals. The AH-PUD is a poor planning tool that never complied with the Jackson/Teton County Comprehensive Plan from its creation. A tool of this nature was not mentioned in the 1994 plan and the LDR changes that took place with the 1994 plan. The tool did not come along until six years later. This ordinance throws basic land use planning out the window by allowing this particular zoning (AH-PUD) to be located anywhere in the County on a case-by-case basis and with almost no limits on intensity. These issues of location and intensity need to be resolved in a more objective comprehensive planning process rather than through an endless flow of development proposals. Let’s be clear that we are not opposed to affordable housing, we are opposed to the up zoning that is used for these projects.
4. Public/Semi-Public (PSP) – We believe that the public (Town, County state or federal) should be held to the same standards as the private development community. PSP zoning is the most flexible of all zonings because it contains NO standards whatsoever. We don’t believe that the PSP zone should go away; we simply want the zone district to contain standards that are consistent with the rest of the community and our community character. The Comprehensive

Plan should contain a goal that all public buildings should set the standard and be the benchmark for expressing our community character and what good development is.

Building Heights- Building heights in Jackson and the County should be limited to two stories for all uses including residential, commercial and industrial. The buildings around the square and a few blocks north, east, west and south are predominantly two stories high and have no setbacks except for public sidewalks along the front and a few parking spaces at the rear. These locations should be carefully mapped and are the only areas that should be allowed to have limited setbacks.

Setbacks for commercial zoning outside of the area described above should be at least 15 feet on the front, 20 feet on the rear and 10 feet on the sides. Building heights should be no more than two stories. This will allow for snow storage along streets, alleys and public sidewalks. These same criteria should apply to industrial zones, mixed-use zones, multi-family zones and larger setbacks for single family zones.

Community Character - Community character is probably the most difficult issue to wrap one's arms around. People view community character in different ways. Our current Comprehensive Plan contains a goal that we maintain our traditional western character. We agree with that statement; however what is meant by that statement requires further explanation. The Comprehensive Plan is a land use document and should stick close to defining community character in terms of its unique built environment. The Comprehensive Plan should contain further explanation of what is meant by Community Character as it relates to opens space, rural lands, building heights, building materials, signage and the character of our streets and highways.

Transfer of Development Rights - The poll that SHJH conducted in the fall of 2007 indicates that the public is supportive of increasing taxes to purchase open space. The Comprehensive Plan should contain a goal that the County develops an effective open space program with a dedicated revenue stream so that open space may be purchased or acquired by donation of conservation easements.

Traffic and Transportation – All of the issues mentioned above are important; however traffic may be the most important of all. Traffic affects wildlife and our quality of life. It is our observation that during this process the updating and evolution of Chapter 8 Transportation has been neglected. Land use decisions cannot be made without looking at the implications upon traffic. Chapter 8 is the most lengthy and most detailed chapter of the Comprehensive Plan and it appears that this chapter is being largely neglected. At the very least, we would like to see detailed traffic modeling associated with each of the development alternatives.

Plan Themes and Policies Outline.

7 – Plan Themes – The Plan Themes are good when viewed in their overall context. They provide broad goals and a vision that few in the community could disagree with. Therein lays the problem with this document and the existing 1994 Comprehensive Plan.

The original purpose of this Comprehensive Plan update effort was to take the plan themes, vision and goals of the 1994 Plan, which most people still support to this day, and put some clarity and substance into those goals and vision statements so that there is less room for interpretation. After making the goals and vision statements more clear, the second purpose of the update was to prioritize those goals. One of the weaknesses of the 1994 Plan was that conflicting goals were not prioritized against each other so that decisions could be made more easily. For example, what do we do when an affordable housing project threatens wildlife habitat? Specific examples follow:

Principle 1.1.c. – Conserve connected and strategically located open space. We all agree with this statement but where is this open space located on a map?

Principle 1.1.d. – Restore environmentally degraded areas. Where are these environmentally degraded areas and who should be responsible for restoring them?

Principle 1.2 – Protect the watersheds, stream, and rivers, and maintain clean water in the region. Again, everyone agrees, but the plan should analyze how we are doing in this area, and recommend changes to our policies and Land Development Regulations to implement this statement.

Principle 1.2.e - Manage urban development to filter all runoff. We agree but who is responsible and how is this going to be done? Will there be setbacks required of new buildings so that runoff can be handled on a lot by lot basis; or will the runoff be the responsibility of the citizens and the government to construct larger storm water detention facilities and further pollute Flat Creek and ultimately the Snake River?

Principle 1.7 – Conserve Remaining Agricultural Resources. This principle says that we should designate our agricultural resources as voluntary Conservation Focus Areas. This principle might be the most ineffective statement of the plan so far. Designating these areas as voluntary is the same as saying that we are going to allow development of our remaining agricultural resources.

We don't want to criticize without offering suggestions. Examples of good policies include the following:

1.7 Conserve Remaining Agricultural Resources

Policy 1.7a: The County should implement an open space program with a dedicated revenue stream to purchase development rights on agricultural lands.

Policy 1.7b: The 9/35 option for development of parcels over 320 acres should be eliminated.

Principle 2.1 – Establish a predictable level of buildout and development pattern for the Town and County through the Future Land Use Plan.

Policy 2.1.a. The Town and County should specifically establish a carrying capacity or limit on the number of beds (lodging units), commercial square footage and the total number of residential dwelling units in the County.

Policy 2.1.b. – Buildout limits should be tracked and run concurrent with transportation capital improvements and the level of service standards for the County’s arterial and collector streets. No development should be built without adequate transportation improvements in place to keep the level of service at or above level of service “D.”

Policy 2.1.c – No increase in development entitlements should be considered without an amendment to this Comprehensive Plan that looks at all aspects of the proposed upzoning and its impacts.

These are just a few examples of policies that have more teeth and will prevent confusion and division within the community in the future.

The purpose of this Comprehensive Plan update was not to completely rewrite the Plan. It was to modify the 1994 Plan so that it has teeth, and evolves from a “cheerleading” document to a planning document. Most citizens support wildlife, clean water, affordable housing, comprehensive transportation systems, etc. If this document for the comprehensive plan update is going to be useful, it has to answer hard questions. How do we specifically protect wildlife? How do we deal with the traffic that is already clogging our streets and the traffic impacts of development that is already allowed under the current zoning?

Preferred Plan (Future Land Uses) and categories.

Big Idea #1 – The first “Big Idea” is to reduce development potential in the outlying areas of the county. We support this idea, but it falls flat on its face in the implementation section. During the last round of meetings the public was told that the discretionary zones would likely go away. This “Preferred Plan” leaves the door open for them to remain. The language used is “modify or remove.” There is a huge difference between the two actions. We still maintain that the AH-PUD and the density bonuses for clustering in the County should simply go away.

Big Idea #2 – Quality Redevelopment in Targeted Locations and Neighborhood Protection in Jackson.

Our first observation about the “Preferred Plan” for Jackson is that there are too many focus areas. We feel this could be simplified greatly into two commercial focus areas and one residential focus area.

“Quality Redevelopment” and “Neighborhood” protection seem to be mutually exclusive. If the definition of quality development means conservation and rejuvenation of neighborhoods rather than redevelopment at greater intensities then the statements can coexist. Unfortunately, this is not the case. The Jackson Focus Areas map shows that many existing residential properties that are zoned neighborhood conservation will be developed for more intense mixed-use residential. How can the plan honestly state that residential neighborhoods will be protected when the plan actually calls for rezoning of Neighborhood Conservation zones to more intense mixed-use residential?

Redevelopment of the “Y” may be possible except that the street system is poorly planned and implemented. There are many missing links in the street system, and the Town Council has

repeatedly voted against making the Snow King/Maple Way connection which is the keystone to improving transportation in West Jackson and providing a route parallel to Highway 89. West Jackson is part of Jackson and should not be treated any different than East Jackson. It is all just Jackson.

Big Idea #3 – Limited emphasis on Mixed-Use Villages in the County. Once again the language regarding this idea is confusing. Aren't the terms "limited" and "emphasis" incompatible? The Wilson Mixed-Use Village proposal has already been tried, and failed. There is no public support for expanding the Resort Zone in Teton Village or for any more Resort Zones in Teton County. There may be some support for development off of High School Road, but a node in southern South Park was clearly rejected by the public at the meeting in January. The only way to have a concentration of development along High School Road would be to have the single property owner transfer all of their development rights to a small area along the south side of High School Road. In this way a large portion of South Park, between Rafter J and High School road would be left as permanent open space. No commercial development should be allowed here because it does not work in these kinds of areas in Jackson Hole. Keep the commercial zoning concentrated in Jackson.

Big Idea #4 - Provision of workforce housing and affordable housing in Town. The big idea speaks of higher density concentrations of housing for our workforce. We assume that would be in the Residential Mixed-Use Focus area, again making the statement that we are going to protect neighborhoods in Jackson inconsistent.

Big Idea #5 – Balanced Transportation that considers Multiple Modes. This section on transportation is the most egregious example of planning denial. The fundamental question is where the cars are going to go for this increase in density and intensity of development in the Town of Jackson. The notion that they are all going to walk, ride bikes and take the bus is not accurate and is not born out in any similar community in the United States. We need to emphasize bike, pedestrian and transit; however, the plan needs to address the 8-10 trips per day that will still be generated by new development. We currently have an exceptional transit and bike system that is unmatched by communities of similar size (we agree that the pedestrian system needs improvement) and that we capture fewer than 20% of all trips. This means that we still have a minimum of eight trips per residential unit to deal with. If we add 7,000 residential units to the valley, as is currently allowed under existing zoning without upzones, we will add 56,000 vehicle trips per day to our highways. Assuming that an arterial can reasonably handle 22,000 trips per day at the stated goal of level of service "D," we need to add 2.55 major arterials to our street network. There is no discussion of where these arterials are going to go.

Our comments and the wishes of the public have also been ignored regarding the PMUD in Town. The plan says "some parts of Town might see buildings increase to three or four stories (along corridors) as long as they are developed to fit the context." This language might fool some of the public, but when applied it means that all buildings will be built to four stories, which more than 80% of the population thinks is unacceptable. Please provide an example of one building that is not along a corridor? Every building is adjacent to a corridor because every property is served by a public street. Furthermore, as soon as the first four story building is built, then the "context" changes from two to four stories and then every building will be built to four

stories. These types of statements in the plan are unfortunate and only add to the public's feeling of being ignored and creates distrust of the process.

This is a "Feel Good" document that says all the right things to a few people, but when placed under scrutiny of the light of day means disastrous consequences for our community. You can not make all the people happy, but you can make most of them happy if the Plan Update responds to what the vast majority of people in Jackson Hole have asked for.

The Plan Update proposals to date do not respond to the vast majority of the people that live here. Look particularly at the polls by Save Historic Jackson Hole, and the University of Wyoming. Secondly, consider the results from the Internet Survey and the survey conducted at one of the public meetings. If you look carefully at these documents you can see what a majority of the people want. This updated plan must give very specific themes, policies and goals in order to make decisions easier for the decision makers. It must make decisions less controversial and give definitive guidelines for developers, commissioners and councilors to follow.

Thank you for the opportunity to comment. We look forward to a response to these issues in the next draft of the Comp Plan Update.

Respectfully,

Darrel Hoffman
Save Historic Jackson Hole Stakeholder Representative

cc Town of Jackson Planning Commission
 Town of Jackson, Town Council
 Teton County Planning Commission
 Teton County Commissioners
 Jeff Daugherty, Planning Director, Teton County
 Tyler Sinclair, Town of Jackson Planning Director
 Jeff Noffsinger, Principal Planner, Town of Jackson
 Bill Collins
 Cara Froedge, Jackson Hole News and Guide
 Noah Brenner, Jackson Hole News and Guide
 Clarion Associates



July 18, 2008

Jackson/Teton County Comprehensive Plan Planning Team

c/o Alex Norton, Project Manager

cc: Town Council, Board of County Commissioners, Town & County Planning Commissions

Re: Comments on the June 2008 Preferred Plan Themes & Policies Draft & Land Use Plan Maps

Dear Planning Team,

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to comment on the draft “Themes and Policies.” We believe that this Plan should be guided by a strategic and comprehensive conservation planning approach – one that recognizes that all development must take place within the context of Jackson Hole as a unique gateway community to two premier national parks and one of the last relatively intact ecosystems in North America. Our comments on this draft should be understood in that vein – *we believe that a place as unparalleled as Jackson Hole needs an unparalleled and unique planning approach.*

Our comments are organized as follows:

- 7 - comment summaries on Themes 1-7
- 7 – sections on Themes 1-7, which includes the text of the draft document with our comments incorporated within draft language. (We have highlighted sections in yellow and provided comments in green italicized print.) Some comments recommend specific language, and some simply raise concerns about the need for clarification or elaboration on a particular idea.

Given the rough draft form of this document, we primarily focused on “big picture” concerns. As the critical pieces of the overall Plan become more closely integrated and aligned (Future Land Use Plan Maps, “Themes and Policies,” and the Introduction [not yet released]), we will provide more specific comments. In some cases, it was difficult to make targeted, constructive comments regarding specific language because it was unclear what was being discussed or proposed. For example, what are “natural resource priority areas” and how might they differ from the Natural Resources Overlay?

We appreciate the work that has gone into this draft; there are definitely some positive elements. However, these elements need to be better framed and described in light of one another, and they should be based on an understanding of capacities, thresholds and conflicting priorities. We also believe that significant changes need to be made in order for the document to have a strong, comprehensible foundation. By our analysis, the Plan is not currently written in a way that enhances predictability or that enhances understanding of how community priorities should be addressed in an integrated way. Specifically, the “Linking Themes” chapter does not yet do this, nor does it sufficiently describe the concept of sustainability in terms of our unique context. It is also unclear how this chapter will be incorporated as part of the Plan and how it will relate to the “Introduction,” which is not yet released. Given that the “Introduction” may link themes in greater detail, we will provide comments when that chapter is released.

We recognize that many “details” will be addressed in the writing of land development regulations, but we still feel that a certain level of detail is critical for the Comprehensive Plan process, particularly given the Plan’s objective to increase predictability. Without a strong, clear Comprehensive Plan, we fear future land-use planning will not be directed in a way that will protect the rare and irreplaceable elements of our community and surrounding ecosystem.

In a nutshell, ***we believe that this document fails to adequately acknowledge and define how rare and irreplaceable some of our assets are - and importantly - all the factors that contribute to our ability to protect, or lose, these assets.*** Broadly speaking, we ask that this next stage of the process take a much closer look at what sustainability should mean for Jackson Hole. A key aspect of sustainability is the recognition of capacity, limitations and thresholds. To be sustainable, we must be willing to acknowledge the very real limitations in meeting different community goals.

More specifically, we would like to see this Plan address planning issues more comprehensively. First, in order to achieve what this Plan directs, the Town and County must approach land-use decisions in a concerted way. This component is critical; the Plan's framework and outcomes are entirely based on strong intergovernmental coordination and it is unclear to what extent this is happening. Second, the Plan needs to emphasize the importance of growing at a responsible rate in terms of both residential and commercial development. Slower rates of growth allow us to learn from land-use decisions and make modifications accordingly. Third, development patterns should be configured to protect wildlife, ecological functions and a high quality of life. (This Plan does a good job of outlining why a minimized development footprint is important for wildlife. However, the Future Land Use Plan Maps need significant refinement and clarity to determine to what extent the footprint will be lessened, and whether the footprint is configured in a way to protect ecologically valuable areas.) Fourth, this Plan should respond to the community support for an overall reduced development potential. In general, densities and scales of development apt to sustaining community character and the overall integrity of the underlying ecosystem should be integrated in this Plan. (The Conservation Alliance is in the process of preparing a memo regarding the Planning Team's position on community support for limited growth potential.)

To conclude, we appreciate the work that has gone into this process. We also recognize how important this process is for the future of Jackson Hole. Just as the planning team has stated, we also want a strong, more predictable plan that is based on asking and answering the tough questions now so that our community doesn't have to address them on a development-by-development basis in the future. We urge you to take our comments with this in mind.

We believe our valley's character is built on the common understanding that our cherished natural resources are of the highest importance to Jackson Hole and the surrounding Greater Yellowstone Ecosystem. We also believe that natural resource protection can best be accomplished when citizens become informed and actively involved. Given these beliefs, we will continue to be actively engaged in this process and look forward to the next phases of public involvement.

Thank you and please contact us anytime at 733-9417.

Sincerely,

Franz Camenzind
Executive Director

Kristy Bruner
Community Planning Director

SUMMARY OF COMMENTS on June 2008 Draft “Themes & Policies”
THEME ONE

Promote Stewardship of Wildlife Habitat and other Environmentally Sensitive Areas and Resources

Big Picture:

Based on the community’s consistently voiced top priority, Theme One should be the foundation of this Plan, rather than an isolated theme. Strategic conservation of the county’s unparalleled wildlife and other natural resources needs to be the basis/foundation of land-use planning decisions. Why? Teton County, including the Town of Jackson, provides an extremely unique planning context. As such, the themes and policies should meaningfully speak to this context – and what it means to be a gateway community committed to stewardship of two premier national parks and one of the last relatively intact ecosystems in North America. In short, the current draft *inadequately* describes the context of the Greater Yellowstone Ecosystem, its irreplaceable wildlife, and how future development and conservation in Jackson Hole can heavily influence regional wildlife habitat and movement corridors and the long-term integrity of the ecosystem.

In general, the current Plan lacks a clear recognition of all the factors that affect our community’s ability to protect wildlife, and therefore insufficiently addresses them. Specifically, while it points to the importance of “patterning” development in a way that protects important habitat, it fails to adequately consider the ways in which both the overall amount of allowable development and the rate of growth can have major impacts on “stewardship” outcomes. By doing so, the Plan highlights the importance of direct effects of development, but undervalues the importance of indirect effects/off-site impacts and cumulative impacts. Indirect and cumulative effects provide substantial threats to achieving our community’s goal to protect wildlife and their habitat; stronger policies are needed to reinforce this recognition.

Key Issues:

- Smart “development patterns” are just one piece of the puzzle in protecting wildlife. We also need to pay attention to other factors, such as the total amount or intensity of development, the rate of development, traffic infrastructure, and dynamic vegetation and habitat conditions (such as those triggered by climate change), to name a few.
- Being cautious (i.e., conservative in terms of development intensity) in land-use decisions is essential, particularly in cases where we lack data, or have outdated data, on particular species or geographic areas.
- It is important to consistently **spell out potential consequences of land-use decisions on wildlife viability**. If development standards are not significantly strengthened in environmentally sensitive areas, individual species are likely to be displaced and the viability of wildlife populations overall will be threatened.
- Habitat connectivity needs to be addressed in significantly greater detail.
- Limitations of science need to be acknowledged, in particularly regarding the identification of “exact thresholds.” Again, where data is lacking, we should be cautious while making land-use decisions.
- Direct, indirect and cumulative effects of development stand to threaten wildlife populations; monitoring must include an analysis of these different forms of “effects.”
- In terms of research priorities, the County should identify the best data collection and management approaches to protect “all native species.” Specifically, the County needs to identify additional species and habitat types that are more representative of diverse species’ needs (in addition to “species of concern”).
- The Plan speaks to the importance of monitoring, but needs to specifically identify a framework and timeline that is funded and feasible. It needs to better articulate guidelines for monitoring and subsequent modification of land development regulations.
- The differences between “NRO” and “natural resource priority areas” need to be clarified.
- Scenic resource policies need a much closer look, particularly as they relate to this theme.
- Policies (for example, to “protect hillsides”) do not reflect a clear prioritization of values.
- Terminology use is sometimes unclear or inconsistent. Examples include: “steer development away,” “avoid,” “restrict,” “promote,” “require,” and “encourage.” “Will” needs to replace “should” in many cases.
- In light of positive efforts to lessen the footprint in the region, overall numbers (residents, commuters and visitors) still matter. Increased human activities in the region threaten the health of wildlife populations on a day-to-day basis.

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**Promote Stewardship of Wildlife Habitat and other
Environmentally Sensitive Areas and Resources
(Theme 1)**

Statement of Ideal

Maintain viable populations of native species ("species of concern"), and preserve scenic vistas and use resources in the most efficient way possible.

The statement needs to be clarified – "Native species" and "species of concern" are very different. Also, these statements need to be consistent throughout the document. (For example, on p. 15, "native species" is used, and on p. 28 "all native species" is used.) The statement of ideal specific to this theme should include language such as the following: "Human activities will allow for viable populations of all native species."

Theme One should refer to "wildlife" in addition to "wildlife habitat."

What does the theme address?

Teton County's abundant wildlife and natural and scenic resources are a local and national treasure, and the community recognizes a stewardship responsibility to protect them. The community has been working to conserve lands through a variety of techniques; however, it is difficult for conservation to keep pace with development. Future development in Jackson and Teton County will take place in the context of stewardship. The wildlife, forested lands, waterways, and meadows throughout the county are a resource with intrinsic value that residents and visitors agree the community must work to preserve and maintain. Compact development patterns can preserve land for open space, as well as lead us towards a more sustainable and energy-efficient development pattern.

Central to this theme, but more importantly, to the foundation of the Plan, is a consistent understanding of "stewardship". "Stewardship" should be defined more clearly, particularly in terms of how land use planning is approached given the community's top priority. In addition, the context of Jackson Hole as a gateway community within the Greater Yellowstone Ecosystem should be clearly described in the introduction to this theme. A map or visual depiction of this role would be beneficial, and would include adjacent federal lands such as Grand Teton National Park, the National Elk Refuge, and the Bridger-Teton National Forest. (Specifically, "Grand Teton National Park" should be mentioned in this document prior to page 22, and the "Greater Yellowstone Ecosystem" should be mentioned prior to page 16. This context should be described on page one of the Plan.) Jackson is the largest community within the Greater Yellowstone Ecosystem and closest to designated wilderness areas.

"Compact development patterns" are a positive and critical piece of a strong planning approach. But, "development pattern" is just one piece of the puzzle because it relates primarily to direct effects. A strategic conservation planning approach would not only consider development patterns, but would also consider the total amount or intensity of development, as well as the rate at which it occurs. These other "pieces" would better address indirect and cumulative effects. In a nutshell, a focus on "development pattern" alone (and given the patterns proposed) would fall short in fulfilling stewardship goals.

Summary of this Theme's Topics

This theme addresses the following topics:

Wildlife habitat (*WILDLIFE*), natural systems clarify ?, and ecologically sensitive resources;

It's important to specifically mention invasive species, vegetation and climate change,

Wetlands, streams, rivers, watersheds, floodplains and riparian areas;

Water quality;

Scenic resources and dark night skies;

Hillsides and forested areas;

Air quality;

Natural hazards;

Agriculture and ranching;

Public access for public lands (*and stewardship of public lands*); and

Sustainable resource use.

Where is this theme a priority?

The Future Land Use Plan shows the Natural Resource priority areas (i.e., the Natural Resources Overlay (NRO)). Where the Natural Resource priority areas are shown on the map, this theme aims for no net loss of land to development.

Explain “net loss”. How does mitigation (and its performance as a natural resource protection policy) factor into this goal? It is also important to clarify the difference between “structural” protection of land or habitat versus “functional” protection of land or habitat. If the goal, as it should be, is to aim for no loss of habitat function, then strategies will require a landscape (rather than site-specific) perspective.

(Note: The planning team is obtaining new wildlife data from the Conservation Alliance and Teton Science School, and will review the old NROs map for appropriate revisions. Discussions will continue about species and habitat priorities and migration corridors that may need to be added to the maps.)

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How does the theme relate to core values?

Environment: “Species of concern” OR “all native species?” and habitat protection, open space, clean air and water, sustainable resource use, conservation.

Community: Economic viability of the region, community health and livability, educational and scientific value. *Unique obligation as stewards – unique mountain community*

Guiding Principles

The following guiding principles support these objectives:

Principle 1.1—Protect wildlife habitat, natural systems, and ecologically sensitive resources of the region

Why is this Important?

Abundant wildlife has always been a draw for the area and distinguishes the region from others. Teton County lies within the Greater Yellowstone Ecosystem—the largest generally intact ecosystem in

the lower 48 states. Yet, biologists believe the region's overall environmental health is in decline, concurrent with increase in human population. *(This is one of the few sentences in the entire text that links increases in human population density with a decline in environmental health. While science cannot necessarily provide, or predict, exact thresholds at which irreparable changes in wildlife populations occur, there is considerable research that demonstrates the direct and indirect effects of human activities on wildlife, such as habitat loss, habitat fragmentation, outdoor recreation impacts, transportation-related barriers and collision-based mortalities, etc... In general, given our community's priority to protect wildlife, our development decisions should be precautionary in cases where we lack substantive data.)* One of the big challenges for the next decades is

finding a balance between human activities and growth and natural systems. Other reasons this principle is important are:

Wildlife and natural systems, do not conform to jurisdictional or ownership boundaries. Private lands, as well as protected public lands, contain crucial habitat for species and are an integral part of a healthy, biologically diverse ecosystem.

Development has occurred on the winter ranges of many of the species valued by the community, restricting the land area needed by wildlife during the most trying part of the year for them. The winter is the most difficult time in the survival of elk, moose, deer, and other big game and non-game species.

The pressure to develop these areas creates the need to manage growth - clarify - to preserve winter habitats and migration corridors that exist on private land.

Wetlands, winter ranges, and migration routes are all independent of ownership and jurisdiction boundaries and cannot be moved as development occurs. *It is important to consistently spell out the consequences of land-use decisions (as they are "spelled out" in other themes of the Plan). In this case, individual species will be displaced and the viability of wildlife populations will be threatened.*

Wildlife adds to quality of life and enhances the community's economy. *This language understates the role of wildlife in this area, and in the ecosystem. It doesn't just "add" or "enhance." The landscape, and the wildlife to which it is home, define Jackson Hole for both residents and visitors from all over the world. Our community has a unique responsibility to the entire Greater Yellowstone Ecosystem – not just our local "quality of life and economy."*

Managing wildlife

habitats, migration routes, spawning habitats, and nesting areas is critical to the wildlife and also the community.

Natural and scenic resource issues have a direct effect on the social and economic well-being of the community. Land use policies that consider ecological and natural systems will protect the area's visual beauty, abundant wildlife and air and water quality, which are draws for the part of Teton County's economy that is tourism-based and for the quality of life for local residents. **These resources and natural systems will maintain the area's critical role.** ? Clarify

This Plan recommends protecting wildlife habitat and intact natural systems through a variety of tools

and strategies, including standards, acquisition, voluntary dedications, and partnerships. In

addition,

the plan recommends identifying measures for how much wildlife habitat has been impacted by development and what is essential to maintain for the viability and health of different species and critical thresholds for particular species.

The intent to identify these measures is a positive step, but it should be understood that the best available science cannot always provide exact “thresholds”, particularly at the finer scale at which local land-use decisions are made. The complexity of the ecosystem, and the scales at which variables affect the wildlife populations we have in Teton County, will always provide challenges to identify “essential” conservation measures at a local planning level. We should be precautionary – particularly in geographic areas where we lack data, have outdated data, or for species that we generally lack data. In a nutshell, we should be precautionary, and not wait for “exact thresholds”. If we “wait” for “proof of impacts”, and particularly given the current rate of growth and land-use change, the chances that we will cross these thresholds before they are understood are high.

Policies that protect the ability for wildlife to move through the landscape are critical. Habitat must be contiguous, accessible and intact.

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Policy 1.1a: Minimize development of wildlife habitat (identified in the Natural Resources Priority area) to maintain biodiversity of native species

What is the difference between a natural resources priority area and the Natural Resource Overlay?

New development and human activities will not fragment (or unnecessarily degrade habitat function) wildlife habitat of species (“of concern”?) identified

in the NRO mapping and will mitigate detrimental effects of development on habitat.

Development standards within the NRO must be significantly strengthened. In general, we should not only have policies to “minimize development of wildlife habitat”, but also to “minimize the effects of development on wildlife.” (Note:

We are seeking further direction about how to interpret the new NRO mapping and species data, and will tighten up this policy when that information is available.)

Human activities in Teton County will minimize conflicts ? clarify - (The direct and indirect degradation of wildlife values will be avoided. Wildlife access and movement across preserve abundant and diverse

wildlife that distinguishes Teton County. To do this, the county will continue a program of comprehensive wildlife protection standards for areas defined as Natural Resource priorities (on the Future Land Use Plan or a separate map). In addition, the county and town will guard against incremental environmental degradation to nest sites, crucial winter ranges, and migration corridors. Great goal ☺, but how will site-specific analyses that assess only direct effects “guard against incremental degradation?” Without clear direction to measure indirect and cumulative impacts, (and baseline data to make this analysis possible), the potential for incremental change will still be high. New development should:

Be sited outside of Natural Resource priority areas (identified in the NRO mapping);

If siting outside a Natural Resource priority area is not possible, limit the size of development and disturbance in the NRO to a certain size, as determined by regulations; Critical piece – Any other specifics on allowable densities?

Minimize impacts on wildlife migration corridors by siting buildings out of the corridors (in the least sensitive areas), minimizing fencing and roads that conflict with wildlife movement; “Minimizing” is not strong enough. In terms of policy, what does “minimizing

roads” mean?

Not plant invasive vegetation or allow noxious weeds and minimize disturbance that leads to increased exotic weed infestations; and

Plan and phase construction activities to avoid impacting crucial lifecycles of species (e.g. breeding) –*reproductive/nesting seasons, etc.*

This Plan will set up systems to monitor cumulative impacts of change in the region and curb development growth when **monitored key species appear to be affected**. *Define “key species.” It’s great to see a discussion on monitoring cumulative impacts. Additional detail in this section will be very important, including criteria for assessing impacts. It will be critical to outline why such an approach is necessary, and secondly, how we can make such an approach “funded” and feasible.*

Policy 1.1b: Require use of non-invasive plant species

Require use of a variety of native or compatible non-native, non-invasive plant species indigenous to the site as part of project landscaping to improve wildlife habitat values.

Policy 1.1c: Conserve connected and strategically located open space

The county and partners will identify potential connected open spaces and **(areas of natural and scenic resources)** *why are these in parentheses?*, **as defined primarily by the Natural Resources Priority area**. *Define this area*, To achieve this aim, pursue multiple techniques and partnerships for open space preservation to permanently conserve large, intact properties.

Include language about the importance of unbroken, contiguous open space for habitat function. In general, it should be clear that not only is corridor protection important (specific to each species), but that the overall landscape needs to be as “permeable” as possible for wildlife use. There are a number of factors that influence permeability, including overall development densities. Particularly in terms of long-term strategic planning and “sustainability”, it is critical to understand that the natural environment is dynamic and not static. A landscape level perspective that considers and addresses cumulative impacts is essential.

In a nutshell, we should not confine protection to narrowly defined areas based on current use; we should also plan ahead for changes, including those triggered by climate change. And, large, intact properties (as stated) should be a top priority, in order to provide as much flexibility as possible to ensure wildlife can adapt to changing conditions.

Policy 1.1d: Minimize disturbance to vegetated and forested areas

Protect large **significant** trees and healthy forested areas. *Or “protect large existing forest communities.” These woodland communities should be perpetuated.* Identify forested areas and establish

standards to protect **healthy significant trees of a certain size**. *Will need further clarification – Is the goal to maintain a particular function? How does this goal link to fire ecology and policy?*

Policy 1.1e: Encourage restoration of environmentally degraded areas

Recognizing that not all strategically-located open space and natural resources are in pristine condition, the county and town will **promote restoration of degraded areas** to their natural condition, enhancing degraded habitats through incentives, programs, and regulations. *It’s great to see discussion on the need for restoration, but to have “teeth” the policy’s objectives need to be clearer. For example, who decides whether “degraded areas” should be determined as “unworthy of NRO designation” versus “worthy of restoration”?*

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Principle 1.2—Protect the integrity of watersheds, streams and rivers, wetlands, floodplains, and riparian areas

Why is This Important?

Waterways, rivers and streams, and wetlands are the lifeblood of the region—for the natural environment and local economy. They provide both natural functions (wildlife, safe discharge of snow melt) and recreational and economic purposes, yet pressures of development continue to stress these areas.

Wildlife, fish, and birds depend on healthy rivers and streams.

A significant economic sector has evolved around guiding, rafting and fishing trips, world class fishing opportunities and world-renowned competitions.

Wetlands are essential to life, as wildlife habitat and for upland and aquatic species that feed, drink, breed, reproduce, or hunt near them. Some wetlands serve as nurseries for commercial or recreationally valuable fish and wildlife. In Teton County they provide (a) water storage and gradual release of runoff, (b) sediment stabilization and phosphorous retention, (c) nitrogen removal, (d) Snake River cutthroat trout habitat, (e) amphibian habitat, (f) breeding and migratory water bird habitat, (g) wintering bird habitat, (h) songbird habitat, (i) beaver habitat, (j) moose habitat, and (k) plant community integrity.

Current land use regulations stress setbacks from water bodies and wetlands and prohibit development in the ten year floodplain. **Maintaining effective setbacks** and other regulations are essential to sustain the waterways and natural aspects of Jackson Hole. *Good language.*

Policy 1.2a: Provide development setbacks from rivers and streams *(all natural waterways?) (ditches?) Ditches may provide different ecological functions. Perhaps different criteria could be established to evaluate them.*

Protect the rivers, streams, high quality wetlands, and other water bodies from the potential impacts of development by requiring setbacks.

Policy 1.2b: Minimize development in floodplains and riparian areas

To reduce hazards and protect water quality and riparian areas, continue prohibition of development in the 10-year floodplain and **minimize** further development from occurring in 100-year floodplains when an alternative location exists. – *“Minimize” could mean a lot of different things. “Restrict”? How many properties fall within this floodplain?*

Policy 1.2c: Provide setbacks to maintain functioning healthy wetlands

Protect high value wetlands that contribute to wildlife and fish biodiversity, flood control, and clean water by requiring setbacks and establishing “best management practices”. *Why not use the phrase “require setbacks”? “Provide” is unclear.*

Principle 1.3—Maintain clean water in the region

Why is this Important?

Urban runoff can negatively impact to the water quality in the Valley if not managed. Forward-thinking efforts, as occurring in the town’s Karn’s Meadow project and filtration efforts should be continued—with particular emphasis on filtering increased urban runoff that reaches the pristine valley water system.

At a countywide level, watersheds are the systems that carry water, sediments, and nutrients from ridge tops to rivers and perform vital water quality and storage functions. Avoiding human alterations that can diminish natural functions of watersheds and streams and rivers is critical. *Any thoughts on how anticipated climate change will affect water availability and quality?*

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Policy 1.3a: Require development to follow Flat Creek Watershed Master Plan

New development will adhere to the Flat Creek Watershed Master Plan, a collaborative effort

of several local, state and federal agencies, which contains many recommended strategies to address urban runoff.

Policy 1.3b: Manage urban development to filter all runoff

Continue town efforts to improve urban water filtration for Flat Creek and identify and strengthen countywide standards to *reduce and* treat urban runoff from mixed-use centers. *Is overall development intensity an issue, given impervious surface limitations, etc.?*

Policy 1.3c: Map Teton County watersheds

Identify the watersheds that relate to the rivers and streams in the region and identify best management practices to maintain clean water. Protect the rivers, streams, high quality wetlands, and other water bodies from the potential impacts of development by establishing “best management practices”. *Good recommendation, although it seems more like a specific action than a “policy”. If this is listed as a “policy”, then “Map Teton County Vegetation and Habitat” should be part of principle 1.1*

Policy 1.3d: Protect integrity of groundwater and aquifer recharge areas

Protect ground water from the potential impacts of development by steering development to areas served by wastewater systems. *What about considerations of overall development intensity?*

Principle 1.4—Preserve the region’s scenic resources and dark night skies

Why is This Important?

The community regards scenic quality as a very important component of the region and community

character. Preserving the scenic resources and skies are important because:

Various types of landscapes determine the scenic quality of Teton County, where scenic vistas are broad and deep. Meadows in the foreground contribute to the open feeling and **rural character of the county**, framing the stunning visual backdrop of buttes, ridgelines, and majestic mountains in the background.

Land use regulations and open space initiatives (land trusts) have generally been effective in limiting visual clutter in the foreground and structures on ridgelines. Landowners have put many scenic properties under easement for permanent protection.

Dark night skies are another component of scenic quality, which local groups are currently assessing and working to maintain low lighting and minimize further light pollution.

Scenic resources, and how they play into the perception of the surrounding environment, have tremendous impacts on both quality of life and visitor experience. Scenery is a defining asset of Jackson/Teton County, and is largely linked to land use proportions between the built environment and the natural environment. The extent to which the landscape becomes increasingly human dominated will have profound impacts on the experience and place of Jackson Hole. The 94 Plan’s chapter on community character included some very specific recommendations and guidelines for protecting the rural character of Jackson. While the concept can certainly be subjective, from a planning approach, the Plan included some very objective and targeted guidelines. Unfortunately, too much of that discussion appears to have been dropped from this draft plan.

There are a certainly a number of factors that affect overall “scenery,” such as our transportation infrastructure. The number of stoplights, number of lanes, volume, etc., will affect the “scenery” of Jackson Hole. This is just one example of many that point to why “numbers matter”, and why a more realistic description of consequences of chosen policies, and linkages between them, are so critical.

Policy 1.4a: Maintain scenic meadow and mountain views

Use a combination of measures to protect scenic quality in the county including continuing effective land use regulations and voluntary protection programs. Site structures and lots

where they will preserve the long views across meadows toward the mountains and buttes, as seen from major roads and highways. (Note: may need to reevaluate and redefine the SRO – evaluate its strength and deficiency.) *Again, scenic resources were a major component of the 94 Plan, and should not be dropped as a priority.*

Policy 1.4b: Keep structures off skylines

Set new development back from ridgelines and skylines to protect scenic quality. Identify key skylines or ridgeline views. Maintain standards to address siting and appearance of structures near skylines or ridgelines as seen from major roads. *In terms of scenic preservation, how does this policy relate to the proposed intensification of hillside development (according to future land use plan maps?)*

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Policy 1.4c: Control lighting to maintain dark night skies

Minimize the amount of artificial light and light spill-over and glare in developments to provide safe conditions and protect the aesthetics of dark night skies. Evaluate and revise lighting standards if necessary. *Any discussion on overall development intensities? Who decides this balance between safety and scenic resource protection? In a recent article, police staff said that crime is expected to increase in response to increased densities in the valley. Would lights be increasingly required throughout neighborhoods if crime did increase? Which value has priority?*

Policy 1.4d: Protect characteristic and unique landforms

Protect appearance of mountains, buttes, glacial valley, historic river benches, glacial moraines in Teton County. *Clarify?*

Principle 1.5—Protect hillsides

Why is This Important?

Many communities limit development on steep slopes to prevent resource degradation and hazards such as landslides, avalanche, and erosion.

Development and grading affects the structural integrity of the hillside, increasing potential for slides.

Moreover, massive grading and cut and fill on hillsides to provide roads, driveways, and structures affects the scenic quality of the town and county. *Given some of the inconsistencies (the future land use plan maps propose intensification of hillside development), this principle needs to be clearly defined. Even if current technology can make hillside development safer or more feasible, what is the overriding principle – aesthetics and preservation of scenic character feasible technologies and safety, or protection of wildlife habitat?*

Policy 1.5a: Minimize disturbance and grading on hillsides

Maintain the visual quality and ecological integrity of forested hillsides by minimizing the footprint of disturbance and adapting development to fit the topography, rather than adapting the topography to accommodate development. Minimize the appearance of road cuts and grading on hillsides. *Define “ecological integrity” and clarify why “forested” hillsides were specifically identified. Also, the “future land use plan maps” propose a south-facing hillside (which is important winter range) as an area for development intensification. Why? In general, given our main goal to protect wildlife, we should be particularly hesitant about “writing off” south-facing slopes given their potential role as important seasonal ranges. In addition, the land uses proposed for hillsides (on the maps) appear to be in direct conflict with other policies to preserve scenery and mountain vistas. If the principle is to “protect hillsides”, then “minimize disturbance” is a very weak policy to address the principle.*

Policy 1.5c: Steer development away from steep slopes

Steer development away from slopes that are steeper than 25% grade to protect visual quality of hillsides and promote safe development. *What does “steer development away” mean? This*

language does not provide increased predictability or clear direction. What are distinctions between “avoid” or “restrict” or “steer development away”? In general, the policy directions for land-use decisions on steep slopes need to be significantly clearer. What about allowable densities of development?

Principle 1.6—Improve air quality

Why is This Important?

Jackson Valley generally has clear air—quality that is well within the limits of Environmental Protection Agency standards, and recent trends do not indicate the need for corrective action.

However, the high-altitude valley surrounded by mountains is susceptible to temporary air quality problems associated with winter temperature inversions. Carbon monoxide mostly from automobile emissions, dust particles, and woodsmoke are pollutants that become trapped.

Dust (as measured by PM 10 particles) has significantly worsened in Jackson Hole.

Attention is needed on **continued monitoring and future mitigating measures** to avoid deteriorating conditions over time. *What about “prevention” measures? In general, given the unique context of Jackson Hole as a high-altitude valley, “numbers” or overall development intensity will matter. Making a conscious choice to limit overall development potential is a viable prevention measure. While the effects of individuals can be mitigated somewhat through technology shifts and behavior modifications, the overall buildout (residential and commercial) will largely influence overall air quality. The higher the number, the greater the emission potential. The more commercial development, the more reasons for commuting from neighboring communities, and therefore a greater potential for automobile-related emissions.*

Policy 1.6a: Maintain and improve air quality through a mix of programs

Air quality programs can include, but are not limited to reducing vehicle miles traveled (VMT), the growth rate of total vehicle miles of travel, reducing wood burning emissions, reducing airborne particulates from unpaved roads, requiring increased dust control at large construction sites, and embracing new technologies, such as cleaner burning engines. The

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county has maintained for several years a successful wood stove rebate program—to replace them with cleaner burning modern devices. In addition, the community will aim to minimize emissions of heat trapping gasses, such as through incentives for fuel-efficient cars/hybrids.

Policy 1.6b: Reduce vehicle miles traveled (*per capita?*)

Implement land use policies and transportation strategies to reduce the number vehicle miles traveled, such as home mail delivery, building pathways and improving transit. New subdivisions should contain a mix of uses and should generally be focused in and around the Town of Jackson and county communities, as identified on the Future Land Use Plan.

Great goals. However, it is critical that we recognize traffic problems cannot be wished away, particularly given some of the current realities of lifestyles in Jackson Hole. Certain trips will be minimized through these strategies, but other factors will be significantly more challenging. It is critical to recognize the degree to which our community has historically underestimated traffic demands. Also, total numbers matter. If the policy to “reduce vehicle miles traveled” aims to reduce congestion and improve air quality, the outcome is equally dependent on the sources for potential vehicle travelers.

Principle 1.7—Restrict development in natural hazard areas

Why is This Important?

Natural hazards in the environment can threaten the natural systems, our built environment, and

human life. Teton County could face several types of hazards.

Teton County is a seismically active area, so earthquakes are a potential hazard.

Other potential hazards include flooding, landslides, avalanche chutes, areas of unstable soil, and wildfires.

The policies below aim to minimize the impact of hazards related to natural phenomena.

Policy 1.7a: Restrict development in floodways

Manage development in areas prone to flooding by prohibiting development in floodways and the ten year floodplain. Limit development in the 100-year floodplain when alternative locations exist.

Policy 1.7b: Restrict development in avalanche chutes and fault zones

Map all areas identified as hazardous Avalanche Chutes and Fault Zones and steer development away from them.

Policy 1.7c: Restrict development in unstable slopes and soils

Coordinate with local geologists to map areas of unstable slopes and steer development away from them.

Policy 1.7d: New buildings will meet codes to address seismic activity

New developments will follow building codes to protect life and safety of occupants during seismic events.

Clarify “restrict”, “limit”, and “steer development away.”

Principle 1.8—Conserve Remaining Agricultural Resources

Why is this Important?

Alta, Buffalo Valley, and Kelly are locations in the county with few remaining active agricultural operations and intact lands. Particularly in Alta and Buffalo Valley have potential for continued viable

farming and ranching operations, and it will be important to broaden conservation efforts.

What about South Park?

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Policy 1.8a: Continue conserving Jackson Hole’s agricultural lands

Continue to support efforts of landowners and land trusts to conserve large intact parcels of land and farming and ranching in the valley.

Policy 1.8b: Conserve farming and ranching in Alta through voluntary measures

The Future Land Use Plan designates Alta as a Conservation Focus Area where the county, private landowners, and other partners will seek voluntary ways to conserve large intact blocks of land and operational farms and ranches. – *We can see the value of focus areas, but why have certain areas been specifically designated and not others? What will these Focus Areas signify in terms of land development regulations? The areas listed in 1.8b and 1.8c do not represent all of Jackson Hole’s agricultural lands.*

Policy 1.8c: Conserve farming and ranching in Buffalo Valley and Kelly through voluntary measures

The Future Land Use Plan designates Buffalo Valley and Kelly as Conservation Focus Areas, as described for Alta in Policy 1.8b, above. *In general, the Plan needs to specify and differentiate between “natural resource priority areas” and “conservation areas”. This policy clearly points to “farming and ranching” as practices to “conserve”. Specific goals should be clear as they relate to “Future Land Use Plan Maps,” as to not confuse different conservation “targets” (such as “conserve ranching” or “conserve rural character and scenic views”, or all of the above).*

Principle 1.9—Maintain public access to public lands for recreation -

Along with access, there needs to be a principle to promote responsible stewardship of public lands (as related to recreation) (i.e. minimize impacts associated with recreation)

In general, the Plan must incorporate strong language that Teton County and the Town of Jackson recognize their role in the Greater Yellowstone Ecosystem (GYE) and will do everything possible to promote the integrity of the GYE.

Why is This Important?

Teton County has vast outdoor recreation opportunity in the millions of acres of public lands lying in

the Bridger-Teton National Forest, Grand Teton National Park, and other federal lands.

However,

public access to federal lands for outdoor recreation are often through private land, and points of access are minimal. Access for recreation needs to be balanced with other multiple purpose objectives of federal lands, such as habitat protection or grazing.

These goals are being refined in the Snake River Resources Management Plan.

Policy 1.9a: Provide recreational opportunities in new developments

To avoid excessive pressure on nearby public lands, new developments should provide recreational opportunities, such as dog parks, trails, parks, and pathways. **Consider incentives for landowners to provide additional access points to public lands.** *Clarify how this sentence relates to the policy above. The policy listed above has more to do with the recommended principle above – to minimize impacts on public lands.*

Policy 1.9b: Provide continued access to federal lands

The county will coordinate with the Forest Service, Bureau of Land Management, and Park Service regarding new public access points and to maintain access to federal lands and to the rivers and natural resource areas (National forest, Snake River, and Flat Creek). Recreational access and human activities should be planned and provided in a manner consistent with resource protection goals to allow for continued populations of native species and protection of scenic quality. New developments should not obstruct existing access points.

Policy 1.9c: Provide improved access to the Snake River on public lands

Promote strategies to accomplish the goals and objectives of the BLM Snake River Resource Management Plan for several parcels along the river, which provide potential for public access to the river, recreation, wildlife and open space. The Plan involves Teton County, the Bureau of Land Management (BLM), the Snake River Fund, the Bridger - Teton National Forest, the Wyoming Game and Fish Department, and the Jackson Hole Land Trust and lists goals and objectives for several BLM parcels along the Snake River. The plan provides for the disposal of

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parcels from BLM, while ensuring that the lands remain in public ownership and available for recreation, public access, open space, and wildlife habitat.

Principle 1.10—Promote sustainable use of resources and minimize waste

Why is This Important?

Consumption of non-renewable energy sources can contribute to air pollution, rapid depletion of resources, and climate change.

Part of achieving a balanced, sustainable community and providing good stewardship of resources is focusing on how the community uses and conserves its resources, such as energy and water. Increased investment in energy efficiency, renewable energy, and energy conservation can lower energy bills, reduce demand for fossil fuels, help stabilize energy prices and energy system reliability, and help reduce air pollutants and heat trapping gas emissions.

Meaningful investment in energy efficiency, renewable energy, and energy conservation in Jackson Hole will happen through ongoing efforts by the Town and County to advance land use planning, improve multi-modal transportation systems, expand recycling and reuse of consumables, and updating (*update*) building standards. *As each new development is proposed*

sustainable guidelines must be met. It is not enough for the developer to say it is a sustainable development. Will the infrastructure required to serve the development drain or enhance energy?

Policy 1.10a: Use resources efficiently and promote renewable energy

Use our region's natural resources, including energy, in a manner that meets our present needs without endangering the welfare of future generations. The county and town will promote private and public conservation of energy resources and promote use of renewable sources of energy, such as solar, geothermal, and wind.

Policy 1.10b: Promote Green Building and site design

Require energy conservation and Green Building. New development will comply with standards to conserve energy and also use renewable resources. Develop a prescriptive energy code and green building standards. Codes should address energy impacts related to **size of structures** and construction (recycling and reuse). *"Require" and "promote" are very different. There are likely to be very different opinions about what constitutes a "green" structure size. Use mitigation program for residential structures over 2500 feet, and all new or remodeled town or county buildings must be built at the equivalent level of LEED Silver.*

Policy 1.10c: Encourage water conservation

Encourage water conservation to protect the region's prized water resources for current and future consumption as well as for recreation purposes, and for use by wildlife and fish. *Clarify "encourage" – versus, for example, "promote".*

Policy 1.10d: Increase recycling and composting

Increase opportunities for recycling, reuse, and composting to minimize solid waste that must be hauled long-distance to a landfill.

Principle 1.11—Increase per capita energy efficiency and reduce overall greenhouse gas emissions

Why is This Important?

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The community has the opportunity and obligation to address the challenge of global climate change.

The issue of managing and reducing carbon emissions that contribute to greenhouse gas runs through

all the chapters of the plan, as it addresses transportation planning, siting of development, building

housing, or monitoring and protection of resources. Some of the largest contributors to energy use

are heating and cooling of buildings and transportation-related energy use (for commuting and vehicle-related use); therefore, how we continue to build structures and communities in the future will

affect energy consumption.

Policy 1.11a: Make new development energy efficient

Locate and build future growth and redevelopment patterns with energy efficiency and resource protection in mind. **Manage** building and construction through the planning process to reduce lifecycle energy costs and improve energy efficiency and resource protection. *In general, there are many degrees of "energy efficiency". Clarify "manage building and construction." Will the County promote any particular standards or certification frameworks to implement this policy?*

Policy 1.11b: Encourage energy efficiency for existing development

Encourage existing development to increase energy efficiency.

Policy 1.11c: Reduce greenhouse gas emissions associated with

development and transportation

Development patterns with higher density mixed-use centers near transit and focused in Town and county communities will help reduce greenhouse gas emissions associated with transportation. A comprehensive transportation network, with transit, bicycle, and pedestrian networks (as proposed in Theme 3) will also reduce greenhouse gas emission. Develop and promote the means to reach a 50% reduction in building-related carbon emissions by 2010 and carbon neutral buildings by 2030. *In general, compact design (not necessarily “patterns with higher density”) helps reduce emissions. While the two concepts are linked, there are important distinctions, particularly in the context of other community priorities.*

Policy 1.11d: Locate commercial and workforce housing in mixed-use community centers and the Town of Jackson

Development patterns should mix land uses so jobs, services, schools, shopping, and other destinations are in close proximity to homes and neighborhoods and restrict locating in Natural Resource priority areas. *This is a good concept, but details for how this plays out on the ground will be critical. Mixed use, as a concept, can be misapplied. For example, expansion of commercial into residential areas to justify development intensification (via mixed-use developments) is inappropriate. There must be a strategic balance between residential and commercial development; to date, recognition of this balance has not occurred. If commercial is expanded into areas where it is inappropriate, it will actually worsen traffic congestion in areas where problems currently do not exist. In a nutshell, the future land use plan maps (for the Town) appear to suggest a geographic expansion of commercial development, which goes against smart planning.*

Suggested Strategies (Theme 1—Stewardship)

(Note: The planning team will work with the community to complete the strategies sections during the next phase of work as they relate to policies. Strategies are included in this draft for discussion purposes.)

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The strategies suggested on pages 25 and 26 are a really good start. As part of this comprehensive plan, a principle should be included that stresses the importance of monitoring and data collection on wildlife resources. This would reinforce the definition of sustainability offered on page 9. A clear strategy, including a funding mechanism and timeline requirements, is essential. The Conservation Alliance will submit specific recommendations for strategies in this “theme” in a separate document.

Theme 1 Suggested Strategies

Assess Wildlife Habitat NRO Mapping and Standards –
Reevaluate NRO mapping and associated LDRs to ensure that all LDR-protected habitats for “species of concern” are included in the NRO and consider including additional habitats and species for protection.

35-Acre Development Standards - Develop standards for 35-acre exemption to create unmanaged impacts to wildlife in NRO areas.

Floodplain Standards – Minimize development in the

100-year floodplain when alternative location exists.

River and Stream Setback Standards – Maintain river setbacks of 150 feet and increase the minimum stream setback to 100 feet (*for new developments?*); work with landowners to create a natural vegetation buffer along rivers and creeks.

Stormwater Regulations – Maintain the stormwater management regulations; strengthen required Best Management Practices for redevelopment; implement Flat Creek Watershed Master Plan.

Wetlands Protection – Develop wetlands protection standards to provide protection of wetlands that are part of wildlife habitat areas (Prepare inventory, key elements would include buffer zone and base the buffer distance for wetlands on the function and importance of the wetland).

Wetland Banking Program – Explore the feasibility of a wetland bank that can enhance existing valuable wetlands.

Wetland Reclamation – Establish a reclamation program to restore critical wetland areas.

Refine PRD Site Design Criteria - Provide better criteria for clustering of lots and structures out of wildlife habitat and migration corridors, to conserve agricultural lands, and to ensure overall density is compatible with rural character in the county. *“Compatibility” as a concept lends to diverse interpretations. At this time, more information is necessary to understand the consequences of criteria modification and zoning changes. Through time, overall density should perpetuate the County’s rural character. How does this PRD criteria relate to removal of density options in remote areas of the County?*

Non-Contiguous PRD – Modify current option for landowners to conserve land.

Water Quality Standards - Refine setback requirements and “best management practices” for point and non-point water pollution.

Species Data and Trends – Coordinate and improve information about Teton County’s ecology and natural systems currently available from multiple sources or not at all.

Scenic Protection Standards – Assess how effectively

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viewsheds have been preserved. Refine Scenic Resource Overlay (SRO) regulations to continue to

preserve key-image setting scenic vistas and skylines.

A closer re-evaluation and focus on scenic resources is warranted. In general, this draft appears to have greatly reduced attention on scenic values and how they relate to the community character of Jackson Hole.

Lighting Standards - Evaluate standards for lighting, especially in new commercial areas to determine if they achieve intent for dark night skies.

Slope Standards – Evaluate whether slope standards, limitations for essential access, and grading standards are effective.

Air Quality Programs – implement land use policies and transportation strategies to reduce VMT

Hazard Mitigation Mapping and Standards – prepare maps locating critical hazardous areas and develop standards to address development siting and mitigation.

Funding Sources for Open Space and Agricultural Purchase of Development Rights – Identify critical lands for purchase. Establish new funding sources (dedicated tax) to acquire open space or development rights for protecting wildlife habitat, for maintaining clean water, for maintaining scenic quality, and for providing public access to recreation areas.

Tree Protection and Forestry – Develop/refine tree protection standards. Develop an urban forestry program to manage urban trees.

Public Lands Access – Develop standards and incentives to address. Coordinate with agencies.

Sustainable Resource Use/Green Building – Develop prescriptive energy code and green building codes to address passive solar design, green roofs, active solar, and other renewable energy sources. Revise zoning codes that act as a barrier to the use of renewable energy systems.

Continue **monitoring** environmental quality (air, water); Continue to promote voluntary protection of important natural, scenic, and agricultural areas through conservation easements; Encourage alternative modes of transportation.

In order to “guard against incremental degradation”, monitoring strategies should be expanded to include a periodic “cumulative effects analysis”. In addition, there is no nexus between monitoring and altering development practices as a result of monitoring results. Monitoring

alone documents existing conditions and nothing more.

In general, the Plan needs to better articulate guidelines for monitoring and subsequent modification of regulations.

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Possible Indicators (Theme 1—Stewardship)

Possible indicators to monitor how well the community is achieving the goals of this theme include:

1. Threatened and Endangered sites (Federal and State agencies?)
2. Wildlife-vehicle collision rates (Jackson Hole Wildlife Foundation data on number of animals, WYDOT data and Grand Teton National Park)
3. Wildlife populations, habitat quality and quantity
4. Exotic weeds (acres treated each year for noxious weeds, Weed and Pest)
5. Natural Resources Overlay (NRO) preservation (acres permanently preserved in NRO, acres developed in NRO, acres restored, as measured through County building permits) – *This type of analysis would have to assess variables such as habitat connectivity and function versus simply “number of acres protected.” First, conservation easements can have very different terms, and therefore have different values in terms of natural resource protection. Second, connectivity among preserved acres is critical. If these areas are isolated or fragmented, the overall function of the NRO is undermined, which would greatly threaten our priority to protect wildlife. More research needs to be conducted on wildlife movements throughout the valley and how varying development densities impede or facilitate movements.*
6. Water quality (condition of drinking water and as healthy habitat for fish and wildlife, Federal agencies)
7. Air quality (compliance with EPA Air Quality standards, days of good quality air per year, Teton County Public Health and Environmental Health Department)
8. Night sky (measured by Teton Valley Dark Skies organization)
9. Percentage of urban runoff system treated with filtering system
10. Open space (annual mapping and preservation of scenic areas, NRO acres, acres in easement and protected, land trust activity)
11. Recycled materials as percentage of total solid waste (responsibility to be determined)
12. Building-related carbon emissions (responsibility to be determined)
13. Per capita use of water (responsibility to be determined)
14. Vehicle-miles traveled (VMT) per capita

SUMMARY OF COMMENTS on June 2008 Draft “Themes & Policies”
THEME TWO
Manage Growth Responsibly

Big Picture:

Given the importance of this theme to the community – as the second most voiced priority in all surveys – policy language needs to be clear and strong. Currently, the policies outlined in this theme fall short in addressing *all* aspects of “responsible” or smart growth. In a nutshell, this section needs significant work. As stated in the Theme One summary, this Plan too narrowly focuses the discussion on development patterns – or the location of development. Undoubtedly, strategic development patterns are absolutely essential. But, so are other issues, such as the overall amount, timing, type, and cost of development, all of which should be addressed collectively to enhance our community’s ability to manage growth responsibly. Under “What does this theme address?” all of these issues should be listed. Policies should also be added that *clearly and consistently* address them.

Even though there is mention that this Plan will outline a predictable amount of growth, it has not yet happened. This “end state” is at the core of community concerns. Actual numbers (for both residential and commercial) need to be readily available so that the public has a real understanding of what the Plan proposes, and therefore potential consequences. This needs to occur as part of a community discussion, and as part of data-based planning scenarios, well before a revised draft enters Planning Commission hearings. Without these critical components, the nature of the planning process is likely to be strongly questioned within the community.

In general, this section suggests the use of incorrect, or incomplete, underlying assumptions about conservation-based planning. For example, it states, “By directing most future growth to well-defined contiguous areas, the town and county can conserve open space, wildlife habitat, and natural resources.” However, human activities (and impacts) associated with development do not stop at the boundaries of development. The impacts from these activities occur at the valley-wide level, on both public and private lands. The amount and type of development in these “well-defined” areas matter. And, to date, these areas are not “well-defined.”

This Plan needs to truly direct smart growth in Jackson Hole. To do that, it needs to identify policies that will first and foremost protect its unique context as a gateway community to one of the last relatively intact ecosystems in North America. Our community and landscape are a global treasure; we cannot afford to make mistakes. We need to grow at a responsible rate, strategically configure development patterns to protect wildlife, ecological functions and a high quality of life, and integrate densities and scales of development appropriate to sustaining community character and the overall integrity of the underlying ecosystem. To ensure that this happens, this theme needs considerably stronger and unique policy language.

Key Issues:

- Community vision and strong conservation planning approaches must guide the Plan and land-use decisions in Jackson Hole, not “market demand.”
- Overall development potential should be reduced. Not only did the public express support for this concept, but it also makes sense as a conservation planning approach. Lower residential and commercial potentials stand to incur fewer impacts on wildlife and pose fewer growth-related challenges overall. Throughout this process, there has been an inconsistent message regarding the need to look at buildout.
- Living compatibly with wildlife, on a day-to-day basis within the valley itself, defines Jackson Hole for many people. Excessive densities that would undermine this compatibility should be avoided.
- *All* assumptions regarding “what 2007 zoning allows” need to be clearly defined. For example, how (and to where) is density being “transferred” from Alta? Estimations based on density options versus baseline zoning could result in highly varied numbers. Also, as numbers (or ranges) are presented with the Future Land Use Plan Map, it is critical that all assumptions are clearly outlined.
- Is this theme firmly based on strong intergovernmental coordination between the Town and County? Tradeoffs are the basis of this theme, yet it appears highly uncertain how implementation will happen.
- The Plan briefly mentions the need to “monitor the rate of growth.” What does this mean? The rate of growth should be monitored and managed. Policies that regulate the rate of growth provide a critical means to learn from land-use decisions and make adjustments accordingly.
- Terminology regarding future redevelopment is far too subjective. Examples include: “The Town will guide development to ensure it is of *high quality* and does not negatively affect existing *stable neighborhoods*”, “Redevelopment and infill must occur *in a measured and deliberate way* so it does not detract from existing neighborhoods”, and “The goals of this Plan call for *careful redevelopment* in town and communities.” (*emphasis added*) This subjectivity will not lead to increased predictability, which was the key goal of this Plan. How is this proposed language any “stronger” than our current Plan?

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Manage Growth Responsibly (Theme 2)

Statement of Ideal

Use lands in a way that meets needs of residents and visitors, while allowing for viable populations of all native species and the preservation of scenic vistas. Limit growth to that specified by this plan—directing most new growth into the town and communities.

Clarify “use lands in a way that meets needs.” Also, the highlighted language above implies growth management is about “directing” or “locating development” when it should also address other factors such as overall amount and rate. When residents “needs” and native species conflict, who gets priority?

What does the theme address?

The Plan is based on the principles of maintaining a compact land use pattern in communities, primarily the Town of Jackson, and future growth that preserves our region’s natural environment, livability, and communities. By directing a predictable amount of growth to well-defined areas, we can efficiently accommodate future needs while still preserving open lands and natural resources, reducing energy consumption and effectively delivering public facilities and services. *What about wildlife?* With a finite supply of developable land, this approach ensures that the region’s growth can be managed to balance growth and conservation. *How is this ensured?*

The Plan should also focus on issues of capacity and slowing the rate of land-use change. The “big idea of reduced development potential”, as supported by the community, should be more explicit in the Plan language, as well as the future land use plan maps. In order to grow responsibly, development should occur at a slow enough rate that lessons can be learned from land-use decisions and adjustments made accordingly.

There should also be more discussion on the quality/character of development as it relates to the unique planning context of Jackson. Economic pressures, if unmanaged, will result in larger “more efficient” structures that will dramatically alter the built environment in Jackson, and therefore the community’s overall relationship to the natural environment. Responsible growth should facilitate an enhancement of the relationship between the natural environment and the resident or visitor, not degrade it. In many cases, this plan seeks to dramatically alter the built environment where people work, play and live; if not carried out appropriately, development will degrade the quality of life for current residents and the visitor experience.

The goal to direct a “predictable amount of growth to well-defined areas” appears to be entirely lacking at this stage of the process. Not only are areas not well-defined in the maps, but the overall amount as an important planning issue has not been at the forefront of the community discussion (as it should be.) We need numbers of “predictable amount” and also WHERE those areas are. We also need to know how the already approved (but not yet built) parcels in town and county are accounted for.

It also appears to be very unclear that the Town and County are coordinating overall land development patterns and amount – which is the basis of this theme. Is the Plan really based on tradeoffs that require this intergovernmental coordination?

Growth management typically addresses many of the topics address in Theme 6 – “Provide for a diverse and balanced community and economy.” For example, growth rates and the balance of

commercial and residential development are typically issues when communities discuss “growth management.” Gateway communities have unique pressures for development and therefore require strategies not commonly applied. It appears that significantly more attention should be given to growth management strategies typically applied in gateway communities. This entire section lacks an understanding of the community desire to protect this region for its role in the GYE.

Summary of this Theme’s Topics

This theme addresses the following topics:

Promote Town of Jackson and county mixed-use centers as locations for limited growth;

Establish predictable buildout through the Future Land Use Plan—balance between county and town;

Ensure adequate community facilities and services (parks and recreation, schools, art, cultural, and other facilities, health and human services, fire protection, water, wastewater, and stormwater utilities, solid waste disposal); *This critical issue (buildout) has not been addressed with the public.*

Ensure development concurrent with, not ahead of, necessary public facilities;

Historic structures and sites preservation;

Quality of development; *The “quality” of development is very subjective.* and Intergovernmental coordination to achieve plan’s goals and growth management.

Where is this theme a priority?

The Future Land Use Plan Map shows the Town of Jackson and future **“town-level”** residential areas and mixed-use communities in the county. (Note: It may be helpful to include a separate map, even conceptual, that shows locations of town and communities.) *Actual numbers (for both residential and commercial) should be readily available so that the public has a real understanding of what is being proposed.*

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How does the theme relate to core values?

Environment: Management and conservation of natural environment, air and water quality *(all themes should relate to the core value of wildlife and be part of the key guidelines that guide the approval or disapproval of development proposals and building permits)*

Community: Communities with adequate facilities, quality development, predictable changes, land

for workforce housing and other community needs

Guiding Principles

The following guiding principles support these objectives:

Principle 2.1—Establish a predictable development and conservation **pattern for the town and county through the**

Future Land Use Plan *Why is there a stated focus on pattern (only) and not on “predictable*

amount?”

Why is This Important?

The 1994 Plan addressed the issue of development and buildout and called for phased monitoring over time. It acknowledges that the concept of buildout is elusive, and that calculating buildout is difficult and uncertain with a character-based plan—where development regulations offer many development options and incentives. **This Plan offers a predictable pattern and ways to measure buildout:** *When will this be presented and be a part of the community discussion? This sentence appears to be in direct conflict with information provided by planners that state the difficulty of measuring buildout. To state that it will happen when in fact it is not apparently happening is a gross disservice to the community.*

The community has expressed a strong desire for development predictability and the ability to determine how much development could occur in different places of the county and the town, **to ensure that growth does not degrade the natural resources of the region.** *As implied here, the amount of growth, not just the location of growth, will determine to what degree natural resources are degraded and community goals are met.*

The Future Land Use Plan (draft under separate cover) indicates how the town and county will build-out, and some general ranges of the possible “end state”. *This has yet to be done. This should occur as part of a community discussion before the draft enters hearings before the Planning Commissions. This “end state” is at the core of community concerns. Without its expression through realistic, data-based scenarios, this Plan will be severely debated within the community.*

Development will be balanced between the town and county and **will strive for a buildout capacity number that is lower than what 2007 zoning allows,** recognizing it is impossible to calculate an exact number of future dwelling units or non-residential development (the “end state”), because of factors such as **market demand** for certain uses, land topography, and other constraints. *First, “will strive for” is very weak language. Development potential should be reduced. Not only was this desire expressed by the public, but it also makes sense as a conservation planning approach. There is no doubt that lower residential and commercial potentials stand to incur fewer impacts on wildlife, the community’s top priority.*

Second, community desires and strong conservation planning approaches, not “market demand”, should guide the Plan and therefore land-use decisions in Jackson Hole.

Third, clarify assumptions about “what 2007 zoning allows.” Lay out assumptions. Are you “transferring” density from Buffalo Valley and Alta?

Studies of natural resources of the region have not defined a carrying capacity limit for human population; however, all recognize that unlimited growth will **likely** diminish ecological systems. Therefore the **Plan aims to limit overall growth** and provide general target ranges and ratios of development types, with emphasis on providing workforce housing, **not new intensive uses.** *“Likely” should be deleted. Clarify “new intensive uses.” Again, “aims to limit” is weak language. It is very important to understand all the assumptions that were used to calculate numbers “allowed by 2007 zoning”. Estimations based on density options versus baseline zoning could result in highly varied numbers. Also, as numbers (or ranges) are presented with the future land use plan map, it is critical that all assumptions are clearly outlined. For example, how are accessory residential units accounted for?*

The Plan suggests mechanisms to monitor future development patterns and amounts. Such an approach to buildout will provide predictability and measurable targets. It will help ensure a balance between the built communities of the region and the natural carrying capacity and conservation.

Policy 2.1a: Future development will be consistent with the Future Land

Use Plan

The Future Land Use Plan establishes a predictable guide for land use types and locations (where future development occurs primarily in and near the town and to some degree in community mixed-use centers) as well as policies to maintain buildout neutrality as the need for future plan amendments arise. This plan calls for regulations, incentives, zoning, and --- start page 30 ----

investments to achieve the desired outcomes of the Future Land Use Plan. (Note: The highest priority implementation strategy for ensuring implementation of this Plan is to amend the LDRs and zoning to be consistent with the Future Land Use Plan. Primary strategies would include modification of discretionary processes, including Planned Residential Developments (PRDs) and Accessory Residential Units (ARUs). In addition, the plan could include a provision in the amendment section to require large scale projects that are not in the plan that would increase density, be approved only after a plan amendment and (a) demonstrate their worth and value to the community, as established by criteria in the plan amendment section, and (b) be offset with a density reduction elsewhere. The draft of the plan will include a plan amendment procedure section with criteria for how amendments occur.)

The above statement seems to provide an “exit clause” to all previous planning intentions. It is too vague and contradictory to previous statements. The Future Land Use Plan Maps that have been presented to the public are confusing and in very rough form. Their lack of clarity (given the intent to enhance predictability) has made for an ineffective phase of the planning process. Also, since LDRs will occur potentially much later in the process, firm and clear language (to guide the LDR language) needs to be in the Comp Plan and reiterated and reflected in the LDRs. All the “details” should not be left until later.

Policy 2.1a’s “note” confirms the importance of the Future Land Use Plan maps in implementing the Plan’s themes. Because the details of these maps are so critical for future land-use decisions, the “details” need to be clearer for the public. Unfortunately, to date, this has not been the case at all. Because the maps are intended to provide “predictable guidance”, the land uses proposed within the maps need to be very clear and predictable. Without these details, the public has had little to respond to.

How does the plan balance regulation with incentives in a way that results in predictability of the “end state”? What is “buildout neutrality” and what does it look like for Jackson Hole?

Policy 2.1b: Use indicators to monitor growth and consistency with this Plan

The town and county will monitor whether the growth is consistent with the policies and Future Land Use Plan in this Plan in terms of locations, balanced mix of uses, and overall amount of development. *What about wildlife viability and conservation goals?* This Plan recommends using indicators to measure growth, but in particular to focus on housing units built; ratios between commercial, housing and resort development; and ratio of conservation acres (wildlife habitat and open space) to development acreages). (See Theme 6, Balanced Community.) *When will this be done? If these measurements were not undertaken as part of a major comprehensive planning exercise, when and how will they be required? As described in another section, a simplistic measurement of the ratio of conserved versus developed acres, does little to indicate success in protecting the function of wildlife habitat. In short, it will take more complex conservation strategies to preserve wildlife habitat and wildlife. Different geographic areas provide very different values in terms of habitat quality.*

Policy 2.1c: Periodically reevaluate the Future Land Use Plan

Recognize the need for flexibility over time and accommodate necessary changes while preserving the intent of the Future Land Use Plan. This Plan provides provisions for periodic

amendments to address community needs. The town and county **should periodically** review land uses to determine if adjustments are necessary to address: housing needs, conservation programs, or provision of services, or overall buildout of the plan. Evaluation should happen as part of regularly scheduled review and update of the plan, or should occur according to established criteria and procedures. (Note: Amendment procedures and criteria—to be added to ensure that amendments advance community core values.) *More discussion should address the possible consequences of excessive flexibility on long-term predictability. Having an ability to adjust is critical, but it is important that overall goals and priorities are kept in place. Also, language should direct details (every x number of years) for periodic reviews.*

Policy 2.1d: **Monitor rate of growth/redevelopment in Jackson**

The impending redevelopment of town suggests the need to **monitor and control** the rate of redevelopment, so the town has the chance to review built redevelopment projects and make necessary changes to regulations/design guidelines, before duplicating decisions. (Discuss whether the town **would institute a growth rate mechanism if redevelopment starts outpacing town resources**.) *Clarify “monitor” versus “monitor and control”. The intention should be clear. Measures that regulate the rate of growth provide a critical venue to learn from past decisions. In a place as unique as Jackson Hole, we can’t afford to make mistakes.*

Define “town resources” and “outpacing”. Does this include traffic capacity, etc.? Some would argue that resources are already being outpaced.

Principle 2.2—The Town of Jackson and mixed-use centers are appropriate locations for town-level development

Why is This Important?

This Plan also recognizes that some **further population growth will occur**, *(How much? and why that amount?)* but that the region has a finite supply of private and suitably developable land, so it recognizes the benefit of compact development in the town and communities as a trade-off for preserving natural areas and maintaining **very low densities of development in the county’s remote and unincorporated areas**. This Plan promotes two types of communities:

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1. The Town of Jackson will continue to be the primary location for **town-level development**.
2. Mixed-use communities in the county will continue to accommodate some town and mixed uses in **keeping with the scale and character of the communities today**, but to a much lesser degree overall than the Town of Jackson. *What is meant by “keeping with the scale and character”? This idea could mean very different things to different people.*

It appears that in general, a great deal of the valley of Jackson Hole has been “written off” as a place for conservation and low densities of development. We’re not sure why this is the case. From an ecological perspective, the valley itself (in and around where a significant portion of the current population lives) provides distinct ecological functions from some of the more “remote areas.” While conservation is an appropriate goal in these remote areas, there is also a strong argument that many areas on the future land use plan map targeted for higher densities are also appropriate and critical areas for conservation. Not only is this important in terms of a strategic conservation approach, but it is also important for protecting the Jackson Hole that residents and visitors are drawn to. Living compatibly with wildlife, on a day-to-day basis, defines Jackson Hole for many people. Excessive densities that would undermine this compatibility should be avoided. If looking at potential unintended consequences, one could argue that tourist/residents will expend greater energy and resources to get further out into “wildlands” around Jackson

Hole, if the valley character shifts so much that day-to-day quality of life, and experience of wildlife, is degraded.

“Town-level development” is constantly changing and increasing in intensity. To avoid subjectivity, actual numbers (ranges) should be provided.

Benefits include:

By directing most future growth to well-defined contiguous areas, the town and county can conserve open space, wildlife habitat, and natural resources. *Again, we would argue that this assumption is an oversimplification. Amount of growth will also play a critical role. The human activities associated with development do not stop at the boundaries of development. The impacts from these activities occur at the valley-wide level, on both public and private lands. The maps are not yet “well-defined.”*

Compact growth makes it possible to deliver public facilities and services efficiently (e.g., water, wastewater, and stormwater utilities, public safety, and schools). Town-level development in remote locations is costly to serve, may create transportation demands, and has negative impacts on natural resources

Focused and compact town development, and provide a variety of housing types. Workforce housing can be located in neighborhoods where it is near jobs, transit, schools, shopping, and arts and culture.

Such a compact development pattern also facilitates providing a range of transportation choices, including transit and pathways.

Compact development helps reduce the region’s carbon footprint and energy use.

Policy 2.2a: Steer future compact town-level development into designated locations

The county and town will ensure that new town-level development occurs in designated locations, as defined by this Plan and depicted on the Future Land Use Plan, and not in remote locations, except very low density rural development, which occurs in designated county locations with existing subdivisions. (Note: Town level development is that which can be served by public water and sewer and contains neighborhoods of a density generally greater than one unit per acre.) Appropriate designated locations for town-level development include:

Town of Jackson (see town plan for more information about mixed-use development locations),

North end of South Park (with town-level net density of up to four units per acre (gross density) – *This is a different number than presented in other draft documents. To avoid confusion, the future land use plan maps should propose consistent and clear numbers to which the public can respond.* near High School Road with a variety of lot sizes and housing types and open

space, parks, and schools)1,

Aspens/Pines,

Wilson, and

Hoback Junction.

The boundaries of these areas or “nodes” should be better defined, in part based on buildout implications.

Most of these places already have compact development and will continue to infill or redevelop incrementally and modestly. This Plan also proposes infill standards to ensure that mixed-use centers and the Town of Jackson are able to maintain and achieve a desirable

The details of South Park density will need to be further refined and addressed in the Future Land Use Plan, but this density refers to the area in orange on the draft map. By way of example, the definition of four units per acre (gross) means that a 100-acre parcel could accommodate up to 400 residential units, where 25% to 40% of that land would be dedicated to public or semi public uses such as roads, open space buffering, parks, and civic facilities such as schools. Densities for various types of housing could vary across a site, so long as the overall number of units does not exceed the allowed gross density. *Details of proposed densities throughout the County, not just South Park, will have to be better defined. For example, it is unclear what types of densities are proposed for lands along the Snake River Corridor.*

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character. The Town will guide development to ensure it is of high quality and does not negatively affect existing stable neighborhoods. (See Policy 2.2b below, Town Subarea Plan (draft under separate cover), *This statement is highly subjective. This subjectivity carries little meaning and enforceability. Given the uses that appear to be proposed in many parts of Town, how does the Town propose to not “negatively affect” certain areas? Consequences of development on neighboring areas are rarely part of the discussion.* and Theme 4, “Jackson as Heart of the Region.)

Policy 2.2b: More detailed sub-area and neighborhood plans for Jackson and county communities will guide development in those locations, where applicable

Detailed planning should guide the development in Jackson and each of the county’s communities. The Land Use Plan section provides a town-wide framework plan and more detailed sub-area principles for the various town neighborhoods. Small area plans have been developed (or are underway) for some of the county’s communities. Wilson and Hoback Junction have plans underway, and Teton Pines/Aspens area has a general master plan that has guided development in this community. These plans will provide guidance for the infill and redevelopment of the communities. *Again, to avoid pressures for sprawl in the future, boundaries of these planning areas should be clearly defined. “Area,” unless more specifically described, is quite meaningless. In addition to these areas, what about Teton Village, etc.?*

Policy 2.2c: Promote infill and redevelopment in targeted locations within the town and communities

If designed well, redevelopment and infill can help retain and achieve quality, mixed-use neighborhoods. This Plan promotes redevelopment and infill for the town and communities as a trade-off and a preference to developing outlying rural areas. Infill and redevelopment will occur in a way that is in character and in context with existing surrounding development. *According to whom? A volunteer-based Design Review Committee? Redevelopment is already changing neighborhoods and is not in character to surrounding developments.* Redevelopment will contribute to the desired character of downtown and communities. The plan will include infill guidelines to ensure that future development is compatible with existing neighborhoods and downtown and communities. *The future land use plan maps currently appear to propose land uses (particularly with regard to bulk and scale) well outside the “desired character” voiced by survey respondents. It doesn’t appear that community preferences are guiding the Plan maps.*

Policy 2.2d: Promote conservation in Natural Resource Priority and Conservation Focus Areas (designated on the Future Land Use

Plan)

Theme 1, Promote Stewardship of Wildlife Habitat and other Environmentally Sensitive Areas and Resources, promotes conservation of natural resources. (See Theme 1, Stewardship).

Steering development to designated areas furthers the protection of these critical areas.

'Promote' is weak language.

Principle 2.3—Preserve and enhance communities through appropriate physical design and scale of development

Why is this Important?

Economic forces and the desire to steer development into the town and existing communities and mixed-use centers can lead to bigger buildings.

Redevelopment and infill must occur **in a measured and deliberate way** so it does not detract from existing neighborhoods. Clear guidelines and regulations must establish parameters of developing, carefully allowing additional development in certain areas targeted for redevelopment, and preserving a lower profile of development in the locations identified for preservation.

The language in this principle needs to be significantly more objective and consistent. Approving "bigger buildings", whether or not in a "measured way", still results in the same outcome – a town largely characterized by significant changes in physical character, which a majority of the community did not voice support for. Current development in Town has nothing to do with "smart growth" or "tradeoffs" and protecting areas in the County – it simply has to do with development intensification in the Town of Jackson, and in a "decision-making vacuum". Approval of four-story luxury hotels has nothing to do with "scraping development options off" in the County. To pretend that it is, is not accurate or constructive. Future redevelopment truly needs to be about tradeoffs.

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Policy 2.3a: The scale and design of new development must fit the existing context—bulk, scale, and general design features

The goals of this Plan call for **careful redevelopment** in town and communities. Such development must fit the scale of context of **nearby** (*adjacent*) development, whether urban, suburban, or

rural, to ensure predictability and compatibility with existing neighborhoods and **communities**.

Define "communities." Do you mean "existing development nodes?"

As new development occurs it must fit the scale, massing, and general appearance called for in the sub area plans, rather than the community or neighborhood changing to fit the development. (Basic design features include building height, setbacks, relationship to street and sidewalks, general window and façade treatment, general architectural style, and landscaping). Infill development should be compatible with surrounding neighborhoods and **the town and county will work with neighborhoods to define appropriate projects and compatibility.** *When will this "details discussion" happen?* Another consideration should

include the identification of appropriate

transitions between land uses and developments of varying intensities, and incorporation of roadway, park, open space, and trail/pedestrian connections. New design standards and guidelines for neighborhoods and communities will guide development.

What does "careful redevelopment" mean? It should be clarified, as these types of terms do not lend to greater predictability about a collective community vision.

(Note: The land use plan chapters for the county and town will contain design principles, to be developed under separate cover.)

Principle 2.4—Recognize the importance of civic spaces and social functions as a part of maintaining a sense of community

Why is This Important?

As our communities mature, it is important to enhance character and heritage by focusing on maintaining our historic areas and downtowns, creating and maintaining public places, and supporting cultural events.

Citizens should continue to have opportunities for cultural exchange, recreation, and learning.

Well designed public spaces are widely recognized for their benefits in communities and for people's social interaction, including: attracting business investment and tourism, providing cultural opportunities, reducing crime and improving public safety, increasing use of transit, and improving overall health when people are able to walk and be outdoors. (from the

Project for Public Spaces: www.pps.org).

Policy 2.4a: Maintain and improve attractive public spaces

The town and county will continue to promote high quality design of public spaces, including creating attractive gateways, preserving views, and providing attractive public right-of-way landscaping. New developments in the Town of Jackson and county mixed-use centers should contribute to quality public spaces—including but not limited to sidewalks and walkways, parks, outdoor squares, and landscaped areas.

Policy 2.4b: Promote attractive, inviting places and civic structures that support local gathering

Public spaces are the building blocks of a thriving community. The town and county will support and reinforce the social aspects of community-building, such as community services and facilities, gathering places, and other non-physical features. Outdoor public spaces such

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as squares or plazas and civic centers, should encourage social interaction and foster a distinct sense of place and meet the needs of a variety of people, including youth, families, young children and seniors. They should also include amenities that provide comfort and relaxation in all seasons and relate to businesses and activities around it. Jackson's public spaces and civic facilities should be interesting, memorable, and reinforce our sense of community. Trails and walkways should connect public spaces as destinations for bicyclists and pedestrians.

Principle 2.5—Preserve historic structures and sites

Why is This Important?

Historic preservation as a local, state, and national movement has matured over the past few decades and has been proven to be a sound economic development strategy and it helps to conserve resources.

At the same time, economic and demographic changes have sometimes diminished the cultural heritage of communities through a process of steady attrition.

Jackson Hole has a great opportunity to promote heritage tourism that shares with the visiting public and local citizens the colorful western history of the community, which could be a distinct addition to the resort and recreational activities of Teton County, broadens visitors' experience, and provides a source of pride for local citizens and businesses.

Some local efforts are underway and should be the foundation for future preservation efforts, including work of the Teton County Historic Preservation Board.

It is important to raise public awareness about the benefits of preservation of historic buildings, sites, structures and cultural landscapes.

What about the preservation of the relationship between the built and natural environments in Jackson Hole? As stated in the 94 Plan, the idea to preserve Jackson Hole as a small town with rural character was a tribute to the preservation of heritage and what draws people to the “last of the old west”. The idea of preserving modest building scales seems to have been dropped. Are there any locations where only these scales will be permitted? Unfortunately, as the overall context is degraded, the value of specific historic sites is likely to shift.

Policy 2.5a: Identify and preserve historically-significant structures and sites in the town and county

Establish and support existing local historic districts to meaningfully preserve historically-significant buildings and sites. Define criteria to identify historic buildings.

Policy 2.5b: Support the work of Historic Preservation Board

The Teton County Historic Preservation Board (TCHPB) has several on-going programs that include identifying historic properties, nominating the most significant structures for National Register designation. The county and town will promote the Historic Preservation Board in its efforts to document and preserve historic buildings and sites. Teton County Commissioners established the TCHPB which has established a Historic Landmark program and funded the stabilization of several structures, small archeological excavations, and surveys of historic buildings. This board has sponsored nominations of local buildings to the National Register and attempts to rescue historically significant structures from demolition.

Policy 2.5c: Enhance preservation education, outreach, and awareness beyond current levels

The Teton County Historic Preservation Board and the Jackson Hole Historical Society and Museum undertake many programs to inform the public about the community’s historic features and history. This education is critical to garner public support for historic preservation; without public awareness historic preservation efforts tend to fail.

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Policy 2.5d: *Support reuse* of existing structures as an alternative to redevelopment

The county and town will *explore* incentives and tools to promote reuse of structures to promote energy conservation. *Given the rate of redevelopment (and demolitions) anticipated to occur, it is critical to take strong steps to incentivize reuse of structures. “Support reuse” and “explore” are relatively weak language. Require recycling of construction waste and reuse of demolition waste.*

Principle 2.6—Maintain the level of service currently provided

Why is this Important?

Sustaining Jackson Hole effort identified a statement of ideal for, “every Teton County resident... to

receive all services the community deems appropriate, delivered at exactly the time needed...”

The availability and phasing of infrastructure and public services in the region affects the safety and quality of life for residents and determines the appropriate locations for higher level of development.

Developments with town-levels of density should be directed to the town or *communities* ?, so that public facilities and services can be delivered effectively.

New development should not diminish the level of service that current residents and taxpayers receive.

Policy 2.6a: Provide infrastructure and public services in an efficient, equitable manner

Project the infrastructure and public facilities needed for the build out and future development pattern, and develop Capital Improvement Plans and development requirements to ensure the facilities and services are provided concurrently with development. Create, update, and fund

Capital Improvement Plans in the town and county. *These goals need to be compatible with sustainable growth and green building. Infrastructure either can be done to save energy or to further drain the already scarce resources of the valley.*

Policy 2.6b: Ensure development will pay its fair share of the cost to provide necessary facilities and services

The town and county will update the system of fees and requirements that assess cost of public facilities and service needs generated by new development. New developments may necessitate new demands for services and facilities, and the development should provide a fair share toward their costs to avoid impacting existing residents. Regulations will be clear and predictable and should not increase costs for workforce housing projects. *This is a great goal, but what steps will be made, and in what priority, to estimate various fiscal impacts of development. Different people will define “fair share” differently. The extent to which new developments are required to pay the actual costs of developing is a central piece of “managing growth responsibly”. In order for a “fair share” to be covered, the impacts analysis should be comprehensive and reflective of market realities. It is critical that new development pay its way so that taxpayers are not continuously forced to subsidize ongoing development. If the costs are not met by the developer, they do not disappear; they are simply passed on to the taxpayer.*

Despite arguments that development would not occur if developers were required to pay their “fair share”, it is critical that if development occurs, it should be required to pay its true costs.

Policy 2.6c: New development will not reduce level of service quality for current residents or tax payers

New development will not reduce the levels of service established in Theme 7, Efficient and Quality Community Facilities and Infrastructure.

Principle 2.7—Continue intergovernmental coordination to achieve growth management

Why is This Important?

The cornerstone of this Comprehensive Plan is continued coordination between local governments—the town and county in particular—and other state and federal agencies with shared interests in the region.

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The Town of Jackson and Teton County first prepared a Comprehensive Plan together beginning in 1991, and their governing boards meet monthly to discuss issues of joint concern.

The agencies are making a strong commitment to continue working together to achieve mutually-agreeable objectives.

Coordination is especially critical to address issues that do not stop at political boundaries, such as transportation, development patterns and growth, open space and resource protection, energy consumption, economic development, and efficient provision of necessary facilities and services. *This principle is, as stated, a “cornerstone” or basis for an effective comprehensive plan. Without effective coordination between the Town and County, key goals of the planning effort will never be realized.*

Policy 2.7a: Continue coordination between the town and county to address issues of mutual concern, including growth management

This Plan recognizes that the county and town are two jurisdictions with a single economy and common environment. The county and town will continue coordinated efforts to implement this Plan’s principles and policies to address issues related to:

Growth and development (including annexation criteria),

Workforce housing,
Transportation,
Open space and trails,
Natural resource conservation, *wildlife and wildlife habitat protection needs to be emphasized*
and
Other issues.

Policy 2.7b: Coordinate with state and federal agencies to implement this Plan

The town and county will continue to coordinate with state and federal government and their various agencies to implement the aims of this Plan and shared interests.

Policy 2.7c: Do not make land use decisions for revenue purposes

Commercial sales tax is a major revenue source for both local governments, and these funds are distributed on a per capita basis; however, the town and county should undertake local land use planning based on the goals of this Plan rather than to capture greater revenue. *Great goal. Interestingly, the land use plan maps show geographic expansion of commercial development. If not for revenue purposes, and given the shortage in workforce housing, why would commercial expansion be preferred? Commercial development potential should be reduced.*

Policy 2.7d: Adopt and use annexation criteria to guide appropriate Jackson expansion

The Town of Jackson will consider annexation of properties if they meet the following criteria:

The property is **a logical extension of town, ??**

The property could be adequately served by utilities, police, fire, and road maintenance,

The property is not in a designate Natural Resource priority area,

All public improvements off-site and on-site will be constructed and financed in accordance with town standards.

Designation within the priority area is determined by the availability of wildlife data. To date, wildlife related research is not conducted in or in close proximity to Town. Research should be conducted in Town, particularly given the lack of baseline data to inform land-use decisions. Research should be prioritized in “interface areas” where federal and local boundaries meet and riparian areas.

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Suggested Strategies (Theme 2—Growth Management)

(Note: The planning team will work with the community to complete the strategies sections during the next phase of work as they relate to policies. Strategies are included in this draft for discussion purposes.)

Theme 2 Suggested Strategies

Amend LDRs and zoning to be consistent with the Future

Land Use Plan - This is probably the highest priority implementation strategy to ensure this Plan will be

implemented! - *This is also why it is so critical to understand what is being proposed in the Future Land Use Plan. The Plan needs to be the right one. If these “maps” are supposed to provide enhanced predictability, it seems essential that details of these Land Use Plans are very clear. They can’t provide predictability without detail.*

Concurrency Management System – system ensures that adequate public facilities and services needed to support growth and protect the environment are available when the service demands of development occur. This should include periodic evaluation of service levels and land use trends.

...to ensure that financial planning remains ahead of the present for concurrency to be evaluated. ???

Finance Mechanisms - Mechanisms to finance necessary public services? Requirements for new development to pay for costs of services.

Capital facilities planning – Refine or develop ongoing Capital Improvements Program (CIP) to ensure development approvals are contingent on capacity of existing and planned facilities to support growth and facilities planning to be consistent with this Plan.

Development referrals - Continue process with referral agencies to review development proposals where adjacent to public lands or where development will create demands for services the agency provides.

Stimulus Investments - Public investments in targeted redevelopment areas (e.g., sidewalks, street improvements, utility upgrades, transit improvements, pedestrian amenities, such as lighting, benches) to spark redevelopment and provision of housing.

Remove regulatory barriers - Evaluate town regulations that constrain infill and redevelopment (e.g., parking requirements, setbacks, lot coverage)

Plan monitoring system with indicators (from the chapters of this Plan). At the very least, over time the county and town should monitor the rate of growth (population and housing units), ratio of new housing to commercial and resort building, and level of service of infrastructure (e.g., transportation).

Plan Monitoring and Update - Re-evaluate the plan every two --- start page 38 --- to five years.

Joint Efforts and Intergovernmental Cooperation - Town and county each dedicate staff positions to the implementation of this Plan. These positions do not share current planning assignments or regular application reviews. Continued intergovernmental contract to coordinate planning and growth management

Form a team of staff members from town and county to

jointly implement the strategies of this Plan. Establish a town/county work program for a consolidated effort by the joint planning team. The two Planning & Zoning Commissions meet semi-annually to monitor and direct the progress in implementing this Plan.

Consolidation of Government Functions or Services - Consider consolidation of governments or governmental functions and revenue sharing of commercial sales tax to remove motivation for land use planning for revenue purposes.

Land for Future Civic Uses and Buildings - Allow funding and purchase of land for civic buildings.

Possible Indicators (Theme 2—Growth Management)

Possible indicators to monitor how well the community is achieving the goals of this theme include:

1. Total housing units and population (if measurable) (Census, residential building permits)
2. Number of acres of land developed/vacant lands remaining (County and town building permits, annual)
3. Number of acres of land converted to development (County and town building permits, annual)
4. New development units in town and in county communities (County and town building permits)
5. Per capita government expenditures (Current and constant dollars)
6. Inventory of services provided by non-profit organizations
7. Number of strategies of this Plan accomplished

SUMMARY OF COMMENTS on June 2008 Draft “Themes & Policies”
THEME THREE
Develop a Comprehensive, Integrated Transportation Strategy

Big Picture:

This theme falls short in adequately linking transportation and wildlife issues. While the “statement of ideal” mentions the need for “safe, unimpeded movement of wildlife”, the remainder of the language lacks adequate discussion and recognition of key issues (particularly as they relate to the two top community priorities – stewardship of wildlife and responsible growth). In general, this theme needs to directly address the linkages between transportation and wildlife population viability, particularly in terms of connectivity and fragmentation. It needs to address fundamental questions, such as: How do major transportation routes (and potential expansions) affect wildlife movements throughout the valley? This current draft doesn’t provide strong policies that work to address these critical and very real challenges.

Also, as we move forward, it is critical to adopt policies that are tied to current conditions in Teton County. In a nutshell, recognition of the real consequences of the current “exceeding of traffic capacity” is critical. The “themes and policies” states: “The traffic generated by present populations of residents and visitors is exceeding the capacity of existing roads and intersections. Future traffic volumes anticipated from continuing auto- dominated travel behavior and dispersed development patterns will far exceed the available road capacity.” These facts alone should strongly influence land-use decisions in Jackson Hole in the years to come.

This theme should specifically address the role of controlling the overall rate of growth (in terms of managing traffic demands and infrastructure capacity). Road (or multimodal) costs and funding sources need to be more adequately considered.

This theme should address scenic character and wildlife issues in an objective way. Road widening will have significant impacts on scenery and the highly valued attribute of Jackson Hole as a small mountain town that provides a high quality of life and visitor experience. Our community should not concentrate and facilitate excessive increases in development potential if it further increases the chances of road widening, given the known impacts that wide road crossings can have on certain wildlife species. Importantly, our community did not voice support for additional road creation and expansion.

Key Issues:

- In order to reduce anticipated transportation demand, this theme should more strongly emphasize policies that limit overall development potential. Limiting overall development potential is a feasible, cost-effective and proactive policy alternative that should be applied.
- Traffic modeling report uses different numbers/data than presented in other reports and statements. Numbers should be consistent across all reports, or variations should be explained.
- Mitigation policies to limit trip generation are positive. That said, it is critical to remember that the degree of vehicle trip reduction (overall) will largely depend on the degree of development intensification that is permitted.
- In terms of incorporating street improvements, fiscal obligations must be balanced with other community priorities.
- Seasonal differences for the use of non-motorized alternative transportation should be recognized.
- Wildlife issues are insufficiently addressed. Transportation infrastructure strongly impacts wildlife. This should be at the center of all transportation policies (not just policy 3.4e).
- Congested roadways (including widening, increases in traffic lights, etc.) will impact the rural character of Jackson, affecting both quality of life and visitor experience.
- Stronger language (in term of pathway design) is essential. Pathways should be configured to maximize the benefits of open space for both wildlife and people in new developments.
- Prioritization should be given to pathways that have greater potential as essential alternative transportation routes than those primarily for recreation. It is critical to examine factors that distinguish alternative transportation-based pathways from recreation-based pathways.

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Develop a Comprehensive, Integrated Transportation Strategy (Theme 3)

Statement of Ideal

Allow residents and visitors to travel safely, efficiently, and economically, shifting away from auto-dependence and increasing choices and opportunities for transit use, walking, and bicycling. The transportation system allows for viable populations for native species, the preservation of scenic vistas, and **safe, unimpeded movement of wildlife**.

What does the theme address?

This theme will guide the town and county as they make transportation policy decisions. The focus of this theme is on developing a transportation system that **meets the mobility and accessibility needs of residents and visitors** in ways consistent with the character of this community as expressed in this Plan. *(Given the statement of ideal, and to link this theme with the community's top priority, transportation policies should be required to address the "movement needs" of wildlife also.)*

This chapter recognizes the need to provide for the **mobility of residents and visitors**. *(What about safe unimpeded movement of wildlife?)* It also recognizes a need to provide this mobility within the context of other community goals contained within this Plan. To achieve this end, this theme examines methods of **managing traffic growth** by shifting auto-dependence. Transit, pathway, and sidewalk system improvements with complementary land use patterns are identified as appropriate means for shifting trips from the automobile to transit, walking, and bicycling. To accomplish this result, the Town of Jackson, Teton County, and Wyoming Department of Transportation (WYDOT) must lead in developing and supporting the facilities necessary for these shifts.

Finally, this theme recognizes that the convenience, affordability, and availability of the automobile in today's society limit the traffic reductions that can be achieved by these shifts. As a result, roadway expansions will still be required in some cases, but decisions must be balanced with environmental and community considerations.

Where is this theme a priority?

Future transportation roadway improvements of countywide significance (identified on page 45) will appear on the Future Land Use Plan or a separate map. In

addition, the Pathways Plan, as updated from time to time, will guide pathways, and START plans will guide decisions about future transit. (Note: The planning team is currently working with WYDOT to prepare models of the Future Land Use Plan to understand where needs for road and other improvements exist.) *Traffic modeling report uses different numbers/data than presented in other reports and statements. Numbers should be consistent across all reports, or variations should be explained. Inconsistent numbers are confusing for the public.*

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Summary of this Theme's Topics

This theme addresses the following topics:

Coordinated approach to land use and transportation planning;
Provide for all modes of travel, including transit, walking, bicycles, and vehicles;
Add capacity to roads and streets only where needed, with consideration of “complete streets” that address all modes **off** travel and **considers impacts** on wildlife and the environment;
Ensure road capacity for emergency responders; and
Provide for a consistent funding mechanism to meet the community’s current and future transportation needs. *“Considers impacts” is weak language. Policies should be required to first, prevent, and second, mitigate impacts on wildlife. This theme should address the linkages between rates of growth and traffic demands/infrastructure capacity. This theme should address character issues in an objective way. Road widening will have significant impacts on scenery and the highly valued attribute of Jackson Hole as a small mountain town that provides a high quality of life.*

How does the theme relate to core values?

Environment: Air quality and natural environment quality, *wildlife viability* -

Community: mobility and economic viability, health and safety

Guiding Principles

The following guiding principles support these objectives:

Principle 3.1—Maximize the benefits of coordinated land use and transportation planning and decision-making

Why is This Important?

The Town, County, and WYDOT recognize that further population and commercial growth will occur

in Teton County. A main component of this Plan is recognition of the relationships between future

land development patterns and transportation needs. Three key elements of this relationship included

in this Plan are:

1. Maximizing the efficiency of necessary vehicular travel by concentrating a certain amount of residential development in the Town of Jackson.
2. Shifting the need for and maximizing the efficiency of necessary vehicular travel by creating small, concentrated communities in the County (“centers”), thereby bringing housing, jobs,

and other common travel destinations closer together.

3. Reducing anticipated transportation demand by limiting the overall amount of residential development in the County. *Where is this represented in the Plan or Future Land Use Plan Maps? Where else in the Plan is this element of development potential addressed? It needs to be addressed.*

In addition:

Improving mobility within the town and county will require an enhanced acknowledgement of the relationships between land use and transportation and focusing on balancing these relationships within the community.

Considering transportation impacts when making land use decisions will help ensure that the road system and transit system will expand as the community expands, and will be able to support the region at acceptable levels of service. *Who defines "acceptable"? Also, both the community preferences for transportation infrastructure and the fiscal and environmental costs of increased transportation capacity should influence the degree to which the "community expands" and not vice-versa as implied above.*

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Policy 3.1a: Design new development and redevelopment to limit trip generation and achieve walkable communities

Promote mixed-use development patterns as a means of reducing vehicle-trips and to achieve a more efficient land use pattern, and link centers, schools, neighborhoods, parks, and other destinations in communities with a continuous pedestrian network and access to transit facilities. *This is a good "smart growth" approach, but in a context as unique as Jackson Hole, numbers matter. The degree of vehicle trip reduction (overall) will depend on the degree of development intensification that is permitted. For example, if 10 units are allowed on a property where only one unit currently exists, even with significant limited trip generation per unit, the net outcome will still be a dramatic increase in vehicle trips overall, and increased congestion.*

In spite of serious efforts on the part of Town and County to increase bike paths and bus service since the 94 Plan, car trips per household have still increased. In terms of estimating potentials for vehicle trip reduction, there needs to be some acknowledgment of limited non-motorized uses during winter months. Many of these uses will vary by season.

Policy 3.1b: Design new development and redevelopment to support transit usage

New development and redevelopment in Jackson will incorporate design features that support transit usage, such as:

- Locating buildings along the street frontage with transit stops located close to the front door;
- Maximum block lengths (e.g., 600 feet) in areas where they have not already been established, to ensure pedestrian access and connectivity;
- Streetscape amenities such as street trees, benches, cross walks, and decorative paving to enhance the pedestrian environment; and
- Clear pedestrian routes within and between development areas and transit facilities.

Locating most new county development in community mixed-use centers within reasonable walking distance from transit stations will also help support transit usage.

As with most design features, moderation in integrating these features into development can be critical. With integration of these features, urban characteristics are enhanced.

Policy 3.1c: Focus most new residential development, particularly workforce housing, in Jackson and contiguous areas ?, to increase

opportunities for alternative travel modes *Define “contiguous areas.”*

By focusing residential development in town, housing opportunities will be provided in close proximity to employment centers and along primary travel corridors. *Resort districts are also major employment centers. Adequate transit to these locations is critical.*

Policy 3.1d: Promote interconnectivity of neighborhood and subdivision streets

The town and county will require an interconnected street system within and between neighborhoods and subdivisions to allow for efficient transit circulation as well as direct bicycle and pedestrian connections. Dead-end and cul-de-sac streets should only be used where required by topographic conditions.

Principle 3.2—Plan a multi-modal transportation system that supports transit, walking, bicycling, and personal vehicle travel

Why is This Important?

Building a transportation network that supports the diverse travel needs and patterns is critical to the

future of Teton County. On a daily basis trips are made by residents, visitors, teenagers, adults, and

seniors. Likewise, trips are made for work, shopping and recreation using all forms of transportation.

Planning the future transportation system with a multi-modal approach ensures the “quality of life”

identified in this Plan can be achieved.

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The primary transportation facilities supporting residential, commercial, and industrial areas are roads, because Teton County’s land use patterns over the past few decades, as with many mountain communities in the United States, evolved in part due to the availability and convenience of the automobile.

The traffic generated by present populations of residents and visitors is exceeding the capacity of existing roads and intersections. Future traffic volumes anticipated from continuing auto-dominated travel behavior and dispersed development patterns will far exceed the available road capacity. *(Recognition of the real consequences of the current “exceeding of capacity” is critical. These facts alone should strongly influence land-use decisions in Jackson Hole in the years to come.)*

Alternative modes of transportation are necessary to counter this trend and shifting a larger percentage of travel from the automobile to other modes is an objective of this Plan.

For this shift to occur, facilities are required to accommodate each transportation mode. The street and roadway corridors in this community provide the main base network on which all modes travel.

Road projects should not be considered only from the perspective of benefits to motorists, rather all modes need to be considered.

It is important to realize that the automobile is the primary mode of transportation in our region. To achieve the desired modal shifts, the roadway system must function at an adequate level. A congested roadway system will not enhance transit ridership, as riders will not like endure lengthy transit trips. Also, congested roadways result in corridors that are not conducive to walking and bicycling. *Again, numbers matter. Increased residential and commercial potential will result in increased congestion.*

Policy 3.2a: Incorporate “complete streets” principles into all town street designs and applicable county road designs

The county and town will design and implement streets that safely accommodate all users of

the public right-of-way including: pedestrians, bicyclists, drivers and passengers of transit vehicles. Pedestrians, bicyclists, motorists and transit riders of all ages and abilities must be able to safely move along and across a “complete street” and have separation from vehicle exhaust when possible. *Is “all” necessary? Priorities should be identified and fiscal obligations must be balanced with other community priorities. There are other factors that determine “safe accommodation of travelers” in addition to specific infrastructure. Auto-based traffic volume is an example. Also, how will this policy affect maintenance requirements?*

Policy 3.2b: Pursue “complete streets” principles in all WYDOT road designs

The town and county will work with WYDOT to incorporate “complete streets” design principles in all state highway-designed and funded roads.

Policy 3.2c: Pursue a comprehensive valley-wide pathway system to increase transportation choices for residents and visitors

The town, county, and WYDOT will continue to support and implement the development of a system of non-motorized pathways based on the current Pathways Master Plan.

These different modes (pathways, etc.) should be integrated in a way that will not impede wildlife movements nor disturb environmentally sensitive areas.

Policy 3.2d: Complete Jackson’s sidewalk system to maximize safety and ease of pedestrian movement

The town will identify gaps and deficiencies in its sidewalk system and establish priorities and funding mechanisms for completing the system. New developments and redevelopment projects will contribute to building a connected sidewalk system and ensure that sidewalks are safe.

Who identifies these gaps? For example, why is the Redmond corridor identified as a key priority for sidewalk enhancement?

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Policy 3.2e: Extend and enhance transit service to major employment, housing, commerce, and recreation locations or centers

The town and county will coordinate with START transit system to plan for transit service to Teton Village, Wilson, South Park, Town Square, Grand Teton National Park, and other centers. Implement Transit Development Plan - *Great goal, but who will fund this? To what extent will “new development” that drives the need for enhanced transit options fund these programs?*

Policy 3.2f: Provide transportation options for emergency service delivery and egress

Principle 3.3—Provide for a consistent funding mechanism to meet the community’s current and future transportation needs

Why is This Important?

Transportation funding for maintenance and capital improvement projects is projected to significantly decline at the federal and state level over the next decade. However, the demand for improved transportation facilitates is increasing. To achieve the transportation objectives in this Plan it is critical to:

Identify multiple public and private funding sources from non-traditional programs,
Develop a consistent and sustainable funding source to fund and promote alternatives such as

transit, bicycle, and pedestrian facilities that get vehicles off the road. *(Lower development potential also gets “vehicles off the road.”)* (A range of financial resources are available to the Town and County for implementation of this Plan, including general fund sources already in place, but also including sources currently not established.)

Involve the private sector (employers, resorts, developers, retail shops, etc.), which also has a major role to play in ensuring the mobility of their employees and customers and thereby ensuring their own long-term viability. *Clarify “involve”.*

Recognize the extent of our region’s transportation system now reaches to other counties, both within Wyoming and to adjacent states and coordinate with communities beyond our jurisdiction to find future solutions needs comprehensively and responsively. *This recognition is critical. Commercial development potential in Jackson Hole (i.e. job creation) has, and will continue to have, tremendous impacts on commuting/traffic demands in the region.*

Policy 3.3a: Establish a long-term, sustainable, reliable and equitable funding mechanism for long range local and regional transit and multi-modal planning

The town and county will work with WYDOT and other state, federal, and regional partners to identify and implement a stable, long-term funding mechanism to meet the transportation needs of the community. *How will land-use decisions be affected by this funding capacity?*

Principle 3.4—Provide a safe and interconnected roadway network that is **balanced with all community goals**

Why is This Important?

Although this Plan promotes strong alternative modes and demand management elements, there will be a need to add capacity to the Teton County roads and streets network as the region grows. It will be important to:

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Identify and recommending additions and expansions to roadways that include consideration of pedestrians, bicycles, and bus transit. *WHAT ABOUT WILDLIFE? How can this principle promote balance “with all community goals” without strong emphasis on the impacts of increased road capacity on wildlife?*

Provide alternative routes by **constructing new corridors** and increasing the capacity of the existing system by adding lanes and improving intersections are two forms of roadway expansions that will increase roadway capacity. *?? The public did not favor new road construction. Also, new roads would fragment wildlife habitat and impact scenic vistas.*

Consider character and design in implementation of these projects and including significant improvements to the pedestrian, bicycle, and transit environments to achieve targeted modal shifts.

Policy 3.4a: Continue to work with WYDOT to balance the need to widen state highways or provide new connectors with “Complete Street” objectives

The town and county will continue to work with WYDOT to ensure that improvements to the state highway system to widen roads or provide additional connectors (i.e., with more than one route for destinations) also accommodate **pedestrians, bicyclists, and transit users** to the maximum extent possible. *And wildlife*

Policy 3.4b: Evaluate **pedestrian, bicycle, and transit connections when planning roadway corridors, and incorporate them when possible *and wildlife corridors***
Pedestrian, bicycle, and transit facilities shall be evaluated and incorporated into the planning

of new or enhanced travel corridors to the maximum extent possible.

Policy 3.4c: Consider roadway widening to be a viable option only after detailed analysis of alternatives and future multimodal transportation demand

While this Plan recognizes that roadway widening may be warranted in some circumstances, the town and county will only approve such action **after careful consideration of alternatives** to determine if future transportation demands can be met without roadway widening. *Reduced development potential overall is a feasible, cost-effective and proactive alternative that should always be applied.*

Policy 3.4d: Establish a Level of Service D (at intersections) as a standard for tolerating congestion and travel delays and for determining road upgrades

The town and county will establish a Level of Service D at intersections as a means for determining when improvements or other mitigation measures are required.

Policy 3.4e: Evaluate the impacts of roadways and other transportation improvements on wildlife corridors, and incorporate crossings

where appropriate – *This policy should be at the center of all transportation policies. Our community should not concentrate and facilitate excessive increases in development potential in the valley if it increases the chances of road widening, given the known impacts that wide road crossing can have on certain wildlife species.*

Roadway and transportation project improvements will be evaluated for their impact on identified or known wildlife migration corridors, and appropriate mitigation measures such as wildlife crossings (i.e., bridge design to accommodate wildlife underpass) **should** be incorporated into project design. *“Will” needs to replace “should”.*

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Potential Road Projects

The following roadway projects are suggested as priorities for detailed evaluation and “Complete Street” analysis. The roadway projects were selected based on the influence each area has on the network and issues that have emerged since the previous Plan update was completed (2003).

1. Indian Springs connector between Highway 22 and South Park Loop Road.
2. Upgrade Snow King – Maple Way as an parallel east/west corridor (as determined in the 2001 Maple Way/ Snow King Design Charrette)
3. Reconstruct the Highway 22/89/26 intersection (the “Y”) to improve all modes of travel and serve as a community gateway.
4. Pursue a multi-lane roadway with WYDOT on Highway 22 between town and Highway 390 that provides trail connections, wildlife overpass, and dual bridges across the Snake River.
5. Redesign Highway 390 from Highway 22 to Teton Village based on “Complete Street” design.

Also, Work with WYDOT to transfer ownership/responsibility of Highway 390 to Teton County so that design standards can be more flexible.

On-going traffic modeling has demonstrated the need for these projects.

Suggested Strategies (Theme 3—Transportation)

Note: The planning team will flesh out this section more during the next phase of work.

Suggested strategies include:

Theme 3 Suggested Strategies

Amend Street Standards – Complete Streets - Implement standards to address a “complete streets” program. Develop a “complete streets” toolkit for developers to use when preparing plans in the development approval process.

Shared Approach – Complete Streets - Work with WYDOT’s Planning, Design, and Policy Division to implement a shared vision for complete streets. **Consider hiring a trip reduction coordinator.** *Is this the most cost-effective way to meet community goals?*

Reconstruct Streets to be “Complete” - Prioritize and reconstruct “incomplete” streets with enhancements for all modes. This includes specific projects that address motor vehicle traffic delay **at major intersections.** *Good priority.*

Implement Transit Development Plan - Work within the timeline identified in the Transit Development Plan to increase bus service to key destinations and replace existing

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buses with a “green” fleet of vehicles. Coordinate with National Park Service and the airport to provide transit to the park (i.e., Moose, Jenny Lake, town connections) and airport.

Implement Trails Master Plan - Work within the timeline identified in the Trails Master Plan to implement the proposed trail network.

Regional Transportation Authority - Form a Regional Transportation Authority with taxing authority to address multimodal travel demands. To adequately address the transportation needs identified by the community, a multi-county cross-state RTA may be required to plan, fund, construct, and address regional travel needs.

Leverage Transportation Funding - Use available local and WYDOT capital project costs to leverage state and national funding programs for non-motorized travel.

Rights-of-Way for Private Roads - Allow creation of public rights of way as an alternative to private roads

Possible Indicators (Theme 3—Transportation)

1. Travel time between centers
2. Resident vehicle miles traveled – home based work trips per capita
3. Miles of pathways constructed
4. Miles of bicycle lanes constructed
5. Transit boardings & alightings
6. Modal shift analysis (every two years)

7. Conduct travel time surveys between centers on bicycle, bus, and automobile and replicate the surveys annually to track progress

And, analysis of wildlife-vehicle collisions and mitigation programs –

In general, this theme/chapter should directly address the linkages between transportation and wildlife population viability, particularly in terms of connectivity and fragmentation. How do major transportation routes (and potential expansions) affect wildlife movements throughout the valley?

Also, pathways should be configured to maximize the benefits of open space for both wildlife and people in new developments. Pathways should be configured in a way to minimize fragmentation of open space and/or potential wildlife habitat.

When implementing the Pathways Master Plan, prioritization should be given to pathways that have greater potential as essential alternative transportation routes than those primarily for recreation. While system-wide connectivity of pathways should be a top goal, it is critical to examine factors that distinguish alternative transportation-based pathways from recreation-based pathways. This is particularly important in the assessment of traffic demands (trip reduction factors, etc.) in new development applications.

***SUMMARY OF COMMENTS on June 2008 Draft “Themes & Policies”
THEME FOUR
Uphold Jackson as “Heart of the Region”***

Big Picture:

This “theme” in particular lacks policies that clearly speak to the unique context of Jackson as a gateway community. In a nutshell, this theme fails to provide increased predictability because it includes language that is far too subjective, vague and inconsistent. Not only are the “Themes and Policies” vague in terms of the direction of redevelopment in Town, but the Future Land Use Plan Maps for the Town currently lack the specificity necessary to make targeted, constructive comments. The concept of “mixed use” is appropriate, but whether the concept is applied correctly within the context of Jackson is only answered through an understanding of details. The level of detail that has been provided to date gets us nowhere near increased predictability nor an ability to evaluate consequences of what is being proposed.

This section implies that “economic forces” could inevitably shape the form of redevelopment in the Town of Jackson. The Plan should not imply this. The Plan should acknowledge that community vision should *proactively* shape development. Our community should not simply react to external market forces; market forces will not protect what is rare or unique about Jackson Hole, including its irreplaceable wildlife. In order to sustain long-term economic viability, our community’s vision should shape development. If we protect what we have, which is becoming increasingly rare, our long-term economic well-being will be sustained. Unfortunately, the Plan doesn’t provide strong direction in terms of identifying elements of physical character that are rare or that contribute to the Town’s “charm.” Without adequate definition of what we are trying to protect as part of the “heart” of the community, how could we possibly succeed in protecting it?

Key Issues:

- Significantly more work needs to be done to identify how the Town can redevelop without losing essential elements of its character. Without clear definitions and boundaries for certain development types, incremental degradation is likely. To many, unacceptable degradation is already happening.
- Do citizens, elected officials, and/or planning staff perceive recent developments in Town as representative of “protecting and enhancing Jackson’s character”? Answers to this question are likely not consistent. This inconsistency reinforces the inherent challenges that come along with the Plan’s subjective guidelines.
- The “themes and policies” state that the Future Land Use Plan Map will provide greater detail to complement this “theme.” When will this greater detail be introduced into the public process?
- The Plan states that “opportunities and challenges” are created as a result of higher densities, but outlines only the “opportunities.” It fails to provide an objective summary of “challenges”, which include: increased crime, elevated noise, diminished “dark skies”, a gradual loss of a sense of community, reduced sun exposure, lowered air quality, traffic congestion and parking deficiencies, reduced scenic views, tax increases, and all the on-the-ground challenges associated with an increasingly urban area in a northern, high-altitude climate.
- The Plan doesn’t provide a realistic analysis of potential consequences associated with different forms of redevelopment. For example, how will increased building heights and larger buildings affect sun exposure, overall energy efficiency, ice and snow maintenance, adjacent property owners, etc.?
- The Plan calls for a vital mixed-use “core”, but doesn’t define “core” in terms of geographic scope and appropriate development potential. At some point, details must be provided.
- The concept of community character has been largely dropped. The 1994 Plan included strong language regarding physical character of the built environment and how it affected overall character. Why remove it?
- Highly subjective terms need to be better defined, including: “carefully promote mixed-use development”, “highest level of design standards”, “stable neighborhoods”, “compatible in scale and use”, “appropriately scaled”, “add to the quality of the area”, and “enhance gateways”, etc.
- The Town’s wildlife issues have not been addressed. There doesn’t seem to be any mention of Karns Meadow, Flat Creek, Cache Creek, or the important deer migration corridor that crosses Broadway, etc. Jackson Hole Wildlife Foundation has identified a major vehicle-wildlife collision hotspot along this corridor, which is within Town limits. Wildlife-related issues should not be ignored in Town.
- Off-site impacts resulting in significantly increased densities in Town have not been addressed, including valley-wide consequences on traffic capacity and human activity-related impacts on wildlife.
- This theme assumes a boost to economic viability, but does so without any research or analysis of associated fiscal impacts.
- As Town development is shaped, the important issues are in the details (total amount, form and type).

Uphold Jackson as “Heart of the Region”

(Theme 4)

Statement of Ideal

Residents and visitors will continue to rely on Jackson as the center of the region and primary location for jobs, housing, shopping, educational, and cultural and arts activities.

What does the theme address?

“Jackson is the historical and community hub for the region, where people live, work and play.” (Town Council’s current “Statement of Strategic Intent”)

The concept of Jackson as the “heart of the region” refers to a planning strategy that recognizes and plans for the concentration of development, particularly workforce housing and commercial services, within the Town of Jackson and immediately adjoining area. This theme is key to reducing vehicle trip reduction and conserving natural areas and wildlife habitat in the region. The “heart” idea is also an emotional, cultural, and values-driven concept that refers to the role that the town plays as the region’s center. Jackson always has been the nucleus of the area as Teton County’s population slowly grew outward from the center of town. Maintaining town as the nucleus of the region is a major theme of this Plan, and steering development into the town helps implement many principles of this Plan. But it also is crucial that the character and charm of Jackson be protected and enhanced, for they too create the heart of the region. The redevelopment of town must be managed to produce great public spaces and pedestrian-friendly streets; result in architecture and site design that contributes to the community; and preserve cultural and historic features that retain our regional heritage.

Will this Plan retain some of the strong language of the 94 Plan that described “character”. This draft does not appear to attempt to define the character or “rarity” of Jackson. Without this definition, how will it be “protected and enhanced”? On a practical level, do planning staff and elected officials perceive recent developments in Town as representative of protecting and enhancing Jackson’s unique gateway community character? In the November 2007 public workshop on development character, it would have been helpful to provide examples of (all) local developments, and then request public feedback on tangible, local examples. It would have been a good way to assess current policies (Design Review Committee, etc.) that supposedly work to shape development in a way that protects character and that contributes to the community. It appears to many members of the public that the current process is failing, as current practices do not uphold the vision of the 94 Comprehensive Plan.

Significantly more work needs to be done (details need to be identified) to evaluate how the Town of Jackson can redevelop without losing its character. Certainly some areas are more or less appropriate for intensification. To date, and as the 94 Plan predicted and gave warning, economic pressures have begun to increase demands for larger, “more efficient” structures. In a nutshell, it’s important to spell out consequences of decisions, such as the loss of unique character – Without detailed boundaries that designate quantitative, specific scales of development, a long-term balance will not be achieved. Economic pressures alone should not dictate the nature of redevelopment in Jackson – the voices of the citizens who call it home and the millions of visitors who travel far to visit a small town in one of the most amazing places on earth should as well.

This theme addresses the broad role and function of Jackson in the region rather than detailed design characteristics. The Jackson Framework Plan and Future Land Use Plan (draft under separate cover) provide greater design and neighborhood and district level detail to complement this theme. *To date, detail has not been provided. If the information that has been provided so far in the public process is supposed to represent this “detail”, it is insufficient. Increased predictability, a goal of this process, will only result from an understanding of proposed “details.”*

Where is this theme a priority?

The Town of Jackson Future Land Use Plan depicts how the town will continue to be the civic, cultural, and historic center of activity with a mixed-use core and healthy neighborhoods.

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Summary of this Theme’s Topics

This theme addresses the following topics:

Recognizing and accommodating Jackson as the population center;
Continuing to support Jackson’s role as civic, cultural, and historic center of activity;
Maintaining a vital retail/mixed-use core that provides regional services;
Fostering healthy and stable neighborhoods;
Focusing on a vibrant public realm with public gathering places; and
Providing town transportation network with complete streets and focus on transit.

How does the theme relate to core values?

Environment: Ability to conserve natural areas and lands and wildlife habitat, air quality,
Community: Economic viability (i.e., development decisions are made for revenue purposes and assumed economic viability?) stable neighborhoods, quality public spaces, historic preservation

Core values should include “wildlife,” not just “areas and wildlife habitat”. Town has wildlife and wildlife habitat. As we’ve stated before, it is important to understand that increases in density (residential and commercial) in Town will have effects on wildlife at the valley-wide level (as well as localized effects in Town.) For example, an ecologically sensitive riparian area could be “protected” in the County, but if 8,000+ new people that reside in the Town go to this “undeveloped” area to recreate (many with dogs), wildlife at the valley level will be strongly impacted. This also points to why it is critical to explore potentials for indirect and cumulative effects of development, rather than just direct effects.

What assumptions were made to determine “economic viability”? Economic viability for whom? Given that this Plan appears to not include a fiscal impacts analysis or any type of assessment of what the proposed Plan directs in terms of long-term fiscal benefits and costs to the community, what is the basis? Study after study demonstrates that growth very rarely pays for itself.

Guiding Principles

The following guiding principles support these objectives:

Principle 4.1—Maintain the Town of Jackson as the population center of the region

Why is This Important?

A core concept of this Plan is to direct most future town-level development into town, and to a lesser degree, the outlying communities. To provide workers with housing opportunities, intensification of development in **certain districts** (*Which ones?*) within the town over time is a goal. These goals are important because:

The Town of Jackson always has been the population center of the Valley, around which other small communities have evolved in the outlying areas. Approximately 48% of the county's population is located in the two square miles of town ,

This concentration of population creates **opportunities and challenges**, including a vibrant and active downtown with many activities and cultural events, enjoyable neighborhoods in which to live, work and play with services and recreational activities in close proximity, and wonderful places for an active public to meet. *Interestingly, only the “opportunities” are listed. To be objective, at least a few of the potential challenges associated with concentrations of populations should be listed (such as increased crime, elevated noise, diminished “dark skies”, a gradual loss of a sense of community, reduced sun exposure, lowered air quality, traffic congestion and parking deficiencies, reduced scenic views, tax increases, and all the on-the-ground challenges associated with an increasingly urban area in a northern, high-altitude climate. For example, how will increased building heights affect sun exposure, and therefore energy efficiency, ice maintenance, etc.? It is critical that the real consequences (associated with different forms of redevelopment) are objectively spelled out.*

Economic forces have the town on the verge of a major phase of redevelopment and infill. *Elaborate. Yes, land prices are high. But the types of redevelopment, in particular planned mixed-use developments, that the Town promotes and endorses contribute to the escalation of land prices. Economic forces alone should not dictate the form of redevelopment. Refer to the Plan's policy “do not make land use decisions for revenue purposes.”*

The challenge is to positively manage changes to maintain the character and charm of the town.

Town is the most appropriate location for housing for a diverse population—including seniors and families with children, because of proximity of medical services and schools and jobs, availability of transit and walkability.

Concentrating much of future development in the town also will help prevent a sprawling pattern of development that degrades the natural resources of the region.

The 1994 Plan Transportation chapter (2002) called for increasing the amount of residential development by approximately **1,200 units** strategically located within the town near the largest job center to reduce overall commuter trips between town and the surrounding counties. **This goal holds true.** *Clarify – Is this the number that is still being proposed? What about commercial development potential?*

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Policy 4.1a: Redevelopment and infill **should enhance Jackson as an enjoyable place to live** *“Should” isn't good enough. THIS IS JACKSON HOLE!!! Redevelopment must occur in a way that it **will** enhance...*

Town contains many **pleasant** neighborhoods and living opportunities, and future development should reinforce neighborhoods of the town. Design guidelines and sub area plans will steer the physical development of town in targeted areas **while preserve its physical**

character. *Define attributes that make neighborhoods “pleasant” in order to protect them. Also, as an example of current policy, it is clear that the proposed Mills hotel will not preserve the physical character of that part of town.*

Policy 4.1b: Emphasize a variety of housing types, including deed-restricted housing, to accommodate a diversity of households in Jackson *Why “emphasize” and not “require”?*

The town currently has the greatest diversity of housing and the most workforce housing in the county. As the regional population center, maintaining this diversity of housing types and styles (e.g., single family homes, duplexes, condos, lofts, and apartments) and the inventory of workforce housing, including deed restricted housing is critical. (See also Policy 5.2a, workforce housing.) *Maintenance of adequate proportions of types is critical, not just “diversity.”*

Principle 4.2—Continue to plan for Jackson as the civic and cultural heart of the region

Why is This Important?

Historically, the Town of Jackson has served as the cultural and social hub for the region and Teton County.

It is the primary location for municipal and county governments as well as regional headquarters for many state and federal agencies.

It is also a major tourist **destination** and a “gateway” to the national parks and Bridger-Teton National Forest.

Tourism and communities and resorts have **gradually** grown. ??

The aim of this Plan is to maintain and enhance the important role of Jackson as the regional center for tourism, government offices, and as an organized gateway to the nation’s parks and forests. *What about the long-term effects of shifting lodging types to high-end luxury hotels? How will this affect a large portion of the families that comprise the tourism base? For whom will the “destination” be, and how will this affect the “civic and cultural heart” of the region?*

Policy 4.2a: Make public investments in strategic locations

Continue to invest in public facilities such as government buildings, parks, recreation, trails, workforce housing, arts and cultural facilities, in locations in town that enhance the town as a civic and cultural hub. *This policy is very subjective and vague and has no connection to Jackson conditions.*

Policy 4.2b: Continue traditions and community events

Continue to sponsor and foster community events in the Jackson downtown that retain the character of the region. Examples of community events and traditions that occur in downtown are: Old West Days; art gallery walk; Old Bill’s Fun Run; art fairs; Arts Festival; Easter egg hunt on town square; lighting of the square for Christmas; the shoot out; elk antler auction; July 4th parade; July 4th fireworks; outdoor concerts at Snow King; the Hill Climb snow mobile competition; rodeo; county fair. The town square is a major visitation site for visitors. New to downtown are the concerts and events at the new Community Center for the Arts. (See Theme 7, Arts and Culture section.)

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Policy 4.2c: Recognize and enhance town recreational opportunities

Continue maintaining the parks and working to connect town to the regional pathway network. Emphasize the connections between town and the surrounding recreational opportunities on federal land (National Elk Refuge, Cache Creek, Snow King Mountain).

Stewardship of these public lands should be emphasized. Along with these opportunities, particularly for drastically increased numbers of people, come many management challenges.

This should be recognized.

Policy 4.2d: Facilitate town educational opportunities

Coordinate to maintain neighborhood schools and other facilities for life-long learning that are important to the community. Educational facilities should be part of mixed-use developments. *(Should there be a base size?)*

Principle 4.3—Maintain a vital retail/mixed-use core in

Jackson *Given the “core” depicted in the Future Land Use Plan Map for the Town, it is easy to see that the concept of “core” is likely to mean very different things to different people (in terms of geographic scope and appropriate development potential). For example, does “core” entail geographic areas where recent developments have been proposed – everywhere from Sagebrush Motel to North Cache, etc.?*

Why is This Important?

Jackson’s downtown is the retail and business center of the region, where most shopping and jobs are located in a centralized, compact area near the population center. *(Other than restaurants, there are nearly no “local services.”)*

Sales taxes provide significant revenue for operating the community.

Throughout the planning process, participants have strongly expressed their support for the concept of a strong town core and housing downtown. Town should continue to be the commercial center providing community-wide services to the population and visitors and a large part of the economic strength of the town is the unique town square and character of the surrounding buildings that form the center of town. *This is a long sentence.*

The Town Square park is a perfect example of a great public space and preserving it and the character of the surrounding block faces is a goal of this Plan. The commercial area that encompasses the very center of town define will experience major redevelopment in the next several

years and managing these changes to sustain and enhance the commercial role will sustain an economic engine that finances many civic functions. *What happened to preservation of character? Research points to character preservation as a long-term economic contributor and “quality of life” contributor..* The Jackson Framework Plan and land use chapter address important design issues for the town square and the downtown area immediately surrounding the square. *When will this be released? Define “immediately surrounding.”*

Policy 4.3a: Protect the image and function of Town Square

Town Square is Jackson’s major tourism draw and visitor retail center. It is also the area that has historically evolved over time and evokes the greatest amount of sentiment and concern over architecture, scale, and community character. The town square area will have the highest levels of design standards to guide future development, uses, and scale of development. *All of Jackson Hole should have the highest levels of design standards. Again, who sets these standards? THIS IS JACKSON HOLE!!*

Policy 4.3b: Continue to promote downtown as a retail and business center

The downtown area immediately surrounding the town square area is also important from an economic standpoint and town image and character for visitors and tourists. The town will continue to support the Downtown as a mixed-use district that is important for civic functions, retail, businesses, and housing. The Town Framework Plan addresses design and scale. ??
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Policy 4.3c: Promote mixed-use redevelopment in designated districts within Jackson

The Jackson Framework Plan and Land Use Plan *WHEN WILL THE PUBLIC SEE THIS?*
identifies areas for future mixed-use

redevelopment opportunities for residents to work, live, and play all within one neighborhood or district, such as near the “Y” or south of downtown along Cache corridor. The mixed-use areas should emphasize pedestrian comfort and safety and should include and support connections to nearby neighborhoods. The town will **carefully promote** mixed-use development with an emphasis on workforce residential, civic functions (such as schools), and commercial in these locations. (Note: the Town Framework Plan will address design issues.)

What is “carefully promote?” Also, clarify if “mixed use” as a concept is to be applied to each and every individual redevelopment project, or if the goal is to encourage a mix of uses in a general area. These are very different.

Principle 4.4—Foster **healthy neighborhoods in Jackson**

Why is This Important?

Jackson residents value their neighborhoods and are concerned about seeing too much change too quickly. As parts of town redevelop and see infill over time, this Plan also acknowledges that many neighborhoods will **remain stable in terms of their scale, image, and uses.**

It is critical that the general public understand what is meant by “stable neighborhoods.” First, many of these neighborhoods have very different housing types already within those areas. Which of these types are intended to remain “stable”? Or, is it the current proportion/mix of types that is intended to remain stable? Second, in many of these “stable areas”, current underlying zoning would allow very different types of developments (scale, image, etc.) that one would see on the ground today. Therefore, does the Plan propose to keep current zoning stable or current “scales and image” stable? This should be clarified within the current public process.

Preserving neighborhoods can help maintain an existing inventory of workforce housing and keep workers near the region’s major employment center.

Policy 4.4a: **Preserve stable neighborhoods**

The town will undertake programs targeted towards enhancement and **stabilization** of established neighborhoods that may include upkeep and preservation of older housing stock. Design standards and guidelines will guide infill and redevelopment projects and encourage housing diversity and rehabilitation. (See the Framework plan map for identification of neighborhoods and reference to neighborhood planning policy above.)

Clarify “stabilization”.

Policy 4.4b: **Promote **compatible infill that fits Jackson’s neighborhoods****

Infill should be **compatible in scale and use with existing stable neighborhoods** and districts. Key considerations should include the identification of appropriate transitions between land uses and developments of varying intensities, and incorporation of roadway, park, open space, and trail/pedestrian connections that enhance the quality of residential experiences.

If the goal of the Plan is to increase predictability, terms such as “compatibility” need to be better defined.

Policy 4.4c: **Prepare focused neighborhood plans for areas of potential change**

Neighborhood planning is a means of drilling into a greater level of detail to address focused area needs than what a comprehensive plan can provide. Certain parts of town may need additional focus and planning and a greater detail than what this Comprehensive plan can provide. Several candidate areas include:

The area around the Fairgrounds

The designated “Y redevelopment” area

What about other areas proposed for significant changes?

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Principle 4.5—Create vibrant, attractive public places in Town

Why is This Important?

Jackson and Teton County enjoy the luxury of being located in a natural (*national?*) treasure of scenic

beauty. Three million tourists are drawn to the Valley every year to experience the beauty and enjoy the activities and ambiance.

The town functions as a gateway to the national parks and forests and serves as hub for the region's tourism economy. Managing the physical development of the community to compliment the natural scenery is a major focus of the town and county.

The stewardship of the area's natural assets should include building the manmade elements that **add to the quality of the area**. The gateways to town, public places and corridors throughout the community are important features in establishing the region's image and commercial success. *How does hillside development and increased building heights in gateway areas (as proposed in the future land use plan map) "add to the quality of the area" or provide a positive transition between the surrounding landscape and the Town?*

Policy 4.5a: Enhance town gateways

The town framework plan addresses the three major gateways for town and calls for **visual upgrades** in both the public realm and on private property. *Who defines "visual upgrades"? Land use broadly described to-date arguably does not "enhance" gateways.*

Policy 4.5b: Enhance pedestrian corridors

The town framework plan addresses pedestrian connections (e.g., between the town square area and Snow King that connects the two major downtown attractions) and calls for enhancements to the pedestrian quality of the community.

Policy 4.5c: Provide high quality parks and recreation

The surrounding national parks and forests can suggest that community parks are less important, ?? however green infrastructure and parks play a critical role in creating a great community. As redevelopment and infill occurs in town, community parks will become increasingly important to provide open spaces and recreational activities. (See Theme 7, Parks and Recreation.)

Policy 4.5d: Design public places that fit Jackson and are safe and inviting to pedestrians

Emphasize quality design for public spaces—streets, civic buildings, and other public spaces—that fits the town's western heritage and character and contributes to quality visitor experiences. Public spaces will be designed for pedestrians and should include wide sidewalks or boardwalks, shade trees and snow structures, benches, lighting, public art, landscaped public spaces such as plazas, ground level retail (with opportunities for outdoor restaurant seating), **appropriately scaled parking lots or garages**, and other design features to make them vibrant and inviting. *Who defines "appropriately scaled"?*

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Principle 4.6—Provide a town transportation network that promotes easy accessibility and choices of travel modes

Why is This Important?

As town continues to infill and redevelop, emphasizing mobility throughout the community becomes increasingly important. —Maximizing opportunities for transit, walking and biking will help the town function as well as

sustain the high quality of life. *(The level of development potential also strongly influences the town's ability to provide a high quality of life and visitor experience.)*

A cornerstone to the transportation system is increasing choices residents and visitors have for traveling around the community, and minimizing the reliance on the automobile.

(See also Theme 3 Transportation.)

Policy 4.6a: Provide pedestrian connections

Mixed-use developments should be designed to allow for a continuous, safe, and inviting pedestrian system. Pedestrian safety as well as links to transit will be an integral part of town.

Policy 4.6b: Ensure streets have complement of bike-ways, sidewalks, paths, and transit

Ensure all future new and redesigned streets contain a full complement of bike-ways, sidewalks, paths, and transit. Where relevant they should contain transit facilities. Fully develop a safe and integrated pedestrian system.

Policy 4.6c: Continue and expand the free Town Shuttle

The ongoing growth in ridership of the Town Shuttle demonstrates the desire of visitors and residents to use transit services. Increasing the frequency of this service is critical in the town's success as a commercial center.

Suggested Strategies (Theme 4—Jackson as Heart)

(Note: The planning team will work with the community to complete the strategies sections during the next phase of work as they relate to policies. Strategies are included in this draft for discussion purposes.)

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Theme 4 Suggested Strategies

R

LDR Consistency - Amend LDRs to be consistent with Future Land Use for Town of Jackson

Neighborhood Planning - Establish neighborhood planning program. – *When will this occur?*

Town CIP for Enhancement Projects - Establish a Capital Improvement Program for gateways, corridors, public investment projects to improve Jackson districts and neighborhoods.

Transit System - Increase frequency of free town transit
Funding and identify needs to complete the sidewalk network throughout town.

Small Area Plans - Develop small area plan for the greater "Y" area.

Pedestrian Corridor Plan(s) - Develop small area plans for:
(a) the greater "Y" area, (b) the Fairgrounds.

Design Guideline Updates - Amend the LDRs and update the design guidelines to provide more specificity, anticipating remodeling of town square buildings within existing character, reflecting goals of this Plan and sub area planning effort.

Corridor Design Plans – Develop a corridor plan for a great pedestrian connection between town square area and Snow King; consider plans for additional corridors

Possible Indicators (Theme 4—Jackson as Heart)

Possible indicators to monitor how well the community is achieving the goals of this theme include:

1. Number of annual community events
2. Number of workforce housing units built in Jackson
3. Number of housing units retained in Jackson
4. Number and type of civic improvement projects (e.g., gateways, parks)
5. Number of blocks that receive sidewalk construction that completes the network
6. Frequency of town shuttle service
7. Number of neighborhood plans completed (including a small area plan for the “Y” area)
8. Number projects completed and consistency with overall goals of this Plan and sub area plans.
9. **Sustained and/or increased commercial sales tax revenue AND FISCAL COSTS of DEVELOPMENT??** *How does this relate to policy 2.7c “Do not make land use decisions for revenue purposes”? Development intensification itself shouldn’t drive the need for “enhancements” and “improvements” throughout the Town. This would be self-defeating. For example, there are many roads in parts of town that are currently quite safe for pedestrian and bike travel. However, when development in these areas intensifies, it is only then that such “improvements” or “pedestrian corridors” will be necessary.*
10. **(note: Determine a quantitative way to evaluate design of infill and redevelopment projects.) This is very important; it must be a top priority!!!**

In general, these indicators should be more comprehensive and reflective of the linkages between themes, rather than particular to one theme. For example, “Jackson as Heart” should also have indicators for wildlife-related issues. In general, given the values component of this theme, indicators on resident quality of life and visitor quality of experience will be important. In general, indicators for how the comprehensive plan addresses top priorities will be more essential than isolated indicators that are not directly linked to the Plan’s fundamental goals.

Crime rates, fiscal impacts, etc. should also be considered as indicators of success/failure.

SUMMARY OF COMMENTS on June 2008 Draft “Themes & Policies”
THEME FIVE
Meet Our Community’s Housing Needs

Big Picture:

This “theme” provides a positive conceptual goal to house workforce locally, but doesn’t necessarily lay out details that are critical in understanding how such a goal could predictably direct land development regulations and land-use decisions. This is not constructive. Housing goals must be comprehensively addressed within broader community priorities – protecting wildlife and managing growth responsibly. Why? It’s pretty safe to say that the demand for such housing will always exceed the supply. In order to effectively address housing needs, we have to think in the long-term. This will require us to sort through some difficult questions and issues. Ultimately, it’s critical to acknowledge that a community can’t grow itself out of growth-related problems, such as workforce housing shortages. In order to effectively address this issue, our community must commit to addressing both the “demand for” and “supply of” workforce housing. Issues of capacity must be recognized.

At the heart of this theme is establishing a quantitative goal for maintaining 65% of the workforce as residents in the community. Given the high cost of housing, the accelerating pace of low-income job creation, and an imbalance between commercial and residential development potential, our community is increasingly challenged to address housing needs. While some elements of housing demand are assumed to be “out of our control”, it is critical to recognize that many key factors are within our control. If we are strategic in our land-use decisions, overall pressures can be lessened. For example, we can limit not only resort development, but also other forms of commercial development. Policies that direct the conversion of some commercial development potential to residential development potential could also be effective. Policies that direct the reduction of excessive commercial development need to be included.

In general, it is problematic to identify a quantitative goal (to meet a certain target) without any understanding of the target. If you have a policy to maintain at least 65% of the workforce as residents, it is critical to simultaneously identify an estimated number (range at a minimum) for total workforce based on commercial potential. This idea of an estimated total workforce is absent. This is why data on residential and commercial buildout ranges and a clear vision of an “end state” is so critical. **How can we have a policy to house 65% of a target (total workforce potential) when we haven’t identified the target (total workforce potential)?** As an example of such a policy for a different theme of the Plan, how effective would it be to have a policy to “conserve 40% of historical moose winter range in Teton County” if we haven’t identified an estimated historical range? One would need baseline data (numbers of acres, etc.) to identify a target, quantitative conservation goal. It is helpful and desirable to have quantitative goals, but in order to predictably direct land-use strategies in the long-term, it is essential to have an adequate and strategic understanding of the overall target. Again, we recognize that the calculations of “exact numbers” are difficult, but believe that an analysis based on probable ranges is feasible and essential.

Key Issues:

- **“Housing needs” needs to be clarified in terms of ownership versus rental opportunity.** This is a very important issue, and one that must be addressed at the “big picture” level.
- It’s unclear how both regulatory measures and incentives (to produce workforce housing) will be utilized in a way that still ensures overall predictability in buildout. How will housing backlog be addressed?
- The current draft has several inconsistencies in regard to future resort development. Policy language needs to be clear, such as “No new resort developments will be approved and no existing resorts will expand.”
- Terminology needs to be clear and strong. For example, “Require” needs to replace “promote” in principle 5.4, “Promote workforce housing as part of redevelopment and infill.”
- In many cases, “will” must replace “should” in the policy language. Language is too weak.
- The community did not voice support for four-story buildings. However, Policy 5.6b includes the use of “mid-to high-rise apartments”. This language should be removed. This language appears to be an artifact of a “boiler-plate” document.
- Criteria for developments to be located “near services” should clearly emphasize “near existing services.”
- In general, the theme doesn’t always reflect an objective analysis of the potential impacts of increased development intensities within the context of other community priorities. For example, the language broadly states, “maintaining a resident workforce and social diversity strengthens the integrity of our community and benefits the environment.” However, the truth of these assumptions lies in the details. For example, when not kept in check with comprehensive community goals, it can trigger actions that harm the environment in the long-term. Local housing production alone will not reduce commuting rates.
- Commercial development potential needs to be addressed. New development should be fully responsible for the housing demand it generates. Also, overall job generation could affect commuting rates.

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Meet Our Community's Diverse Housing Needs (Theme 5)

Statement of Ideal

Meet the **housing needs** of at least 65% of our community's workforce in Teton County, Wyoming.

Clarify "housing needs" in terms of ownership versus rental opportunity. This is an important issue that must be discussed at the "big picture" level.

What does the theme address?

Jackson and Teton County have long been known for their social and economic diversity, as a community of residents who have diverse backgrounds and incomes. However, this characteristic of the community is in jeopardy **due to steadily rising housing prices** *(and other factors such as a rising number of low-income jobs)* that force many **middle class households** *(low and middle income)* out of the community and into neighboring counties.

Maintaining

a resident workforce and social diversity strengthens the integrity of our community and **benefits the environment**. *(Why is this mentioned here? Is there an assumed reduction in commuting? When not kept in check with overriding community goals, it can trigger actions that harm the environment in the long-term.)* This Plan includes strategies to promote workforce housing so Jackson and Teton County can maintain a stable and socially diverse population. The magnitude and complexity of the workforce housing issue calls for a multi-faceted approach, involving the private sector, non-profit agencies, local government, employers and residents. This also increases community acceptance, as the burden of providing housing is shared across many parts of the **community to avoid disproportionate impact on any single segment**. *New developments that disproportionately worsen the housing shortage should pay the true costs that they place upon the community.*

Summary of this Theme's Topics

This theme addresses the following topics:

Maintain the community's middle class and a stable resident workforce;

Establish a target for housing programs; *Clarify "target".*

Promote housing as part of town redevelopment;

Increase predictability for neighbors, developers and the community regarding location *(and amount)* of workforce housing *in the long-term*; and

Provide a diversity of housing types.

Where is this theme a priority?

The Future Land Use Plan depicts locations for mixed-use development and town-level housing. Workforce housing is

priority development type in designated locations (Town of Jackson and county mixed-use centers) outside of **Natural Resource Priority areas**, as identified in Principle 2.2 of this Plan. *Again, natural resource priority areas versus NRO should be clarified.*

What is Workforce Housing?

"Workforce housing" means housing that can be **afforded** (*purchase and/or rental?*) by and is intended to meet the **needs** of our workforce (such as police officers, fire fighters, teachers, nurses and medical technicians, office workers, service employees,)

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How does it relate to core values?

Environment:

Development in appropriate locations (close to jobs, services) reduces air quality impacts

Density can be used to protect open space (less sprawl)

Greater percentage of workforce housed locally reduces commuting needs (*Reduced commercial potential/lower job creation potential and conversion of commercial potential to residential potential also reduces "commuting needs"*)

Community:

More diverse community, better social fabric

Maintains traditional small-town feel and character - *How does this maintain "small-town feel"?*

Enhanced community vitality

Guiding Principles

The following guiding principles support this theme:

Principle 5.1—Maintain the community's middle class and a stable resident workforce

Why is this Important?

The community's housing goals serve dual purposes: social and economic (*Above "environment" was also listed as a purpose.*) A large portion of the community's workforce occupies houses they purchased when the prices were much lower.

When

they retire or move away their replacement employees will not be able to afford these existing houses.

Further, as land values increase, gentrification will replace many existing homes with larger and more

expensive houses, and affordable residential units within commercial properties in town will be replaced with more expensive market rate units during redevelopment. In addition to economic factors, the working middle class provides a more sustainable population. **Many of these community**

members volunteer for public events and non-profit agencies, serve on boards and committees, join

local places of worship, and participate in local government. *We agree, but to be objective, many*

community members that volunteer and contribute are retired or “second home-owners.” It is also important to recognize the contributions that these individuals provide to the community. It is questionably beneficial to differentiate the contributions of the “working middle class” versus other community members. All contribute and add to community vitality. Maintaining social diversity and a resident middle class is crucial to carrying forward this goal to be a community. Other reasons this principle is important are:

The high cost of housing (*accelerating pace of low-income job creation and imbalance between commercial and residential potential are also contributing factors*) in Jackson and Teton County has caused many workers to move to surrounding communities. Between 1990 and 2000, the number of workers commuting to jobs in Teton County increased from 14% to 20% of the county’s workforce, and the number increased to 32% in 2005. This has an adverse impact on our air quality, and increases pressure to add roadway capacity to accommodate commuters.

Comparing the median income in the community to the median home price is a common measure of housing affordability. In 2008, the median priced home costs about 1,800% of the median income.

Another measure of affordability is the number of housing units available within affordable price ranges. Some market rate housing was affordable to workers in the early 1990’s, but the availability of these units has been steadily declining. The housing market essentially provides no opportunities for wage and salary earners to own a home. Deed restricted housing units are the only opportunity local workers **have to live in the community.** (*or only opportunity to own a home?*)

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Policy 5.1a: Preserve existing stock that currently houses the workforce

Producing new workforce housing is both financially and politically difficult. The town and county **will work to maintain** the existing inventory of workforce housing. *Why not “will maintain”?*

Policy 5.1b: Promote a comprehensive strategy of diverse regulatory and programmatic initiatives to produce new workforce housing

New housing will be needed as the community grows, the demand for employee services increases, and **some of the existing inventory is lost** (*this is in conflict with the above policy*) from the pool of affordable housing.

Approaches should include:

Maintaining updated housing requirements on new development;

Facilitating the efforts of the Teton County Housing Authority, Jackson Hole Community Housing Trust and Habitat for Humanity; and

Providing funding from the Special Purpose Excise Tax (SPET).

This needs to be more specific. The use of both regulation and flexible incentives (often excessively flexible) should be better defined to ensure increased predictability in development decisions. Regulatory measures tend to provide more predictable returns. Will incentives be used to address “catch up” only?

Principle 5.2—Establish a quantitative goal for maintaining 65% of the workforce as residents in the community

Why is this Important?

A resident workforce **maintains a higher level of commitment and involvement in the community.** (*Higher than what? – Clarify*) As

the workforce leaves the community and the reliance on commuters grows, the level of service for businesses diminishes and becomes less reliable, and level of community involvement is reduced.

Peer mountain resort community research suggests that when less than 60% of the workforce resides in the community **a tipping point** is reached. (Teton County Housing Authority). When this point occurs, the community has a greater sense of resort and less of a sense of a community. A long standing goal of Jackson and Teton County is to be a community first and a resort second, and maintaining a significant resident workforce is critical to sustaining this goal. *We agree, but it is also important to acknowledge that there are “tipping points” when a “small town” community loses the attributes that a “small, rural town” characteristically holds. The “big picture” of Jackson as a small western town should not be lost.*

Policy 5.2a: Maintain at least 65% of the workforce as community residents

Adopt the **numerical goal of 65%** of the workforce as community residents.

*This is a good conceptual goal that few are likely to debate. However, on a practical land-use planning level, what does the goal suggest for implementation strategies? If you have a policy to maintain at least 65% of the workforce as residents, it is critical to simultaneously identify an estimated number (range at a minimum) for total workforce based on commercial potential. This is why data on residential and commercial buildout ranges and a clear vision of an “end state” is so critical. **How can we have a policy to house 65% of a target (total workforce potential) when we haven’t identified the target (total workforce potential)?** As an example of such a policy for a different theme of the Plan, how effective would it be to have a policy to “conserve 40% of historical moose winter range in Teton County” if we haven’t identified an estimated historical range? One would need baseline data (numbers of acres, etc.) to identify a target, quantitative conservation goal. It is helpful and desirable to have quantitative goals, but in order to predictably direct land-use strategies in the long-term, it is essential to have an adequate and strategic understanding of the overall target.*

Again, we recognize that the calculations of “exact numbers” are difficult, but believe that an analysis based on probable ranges is feasible and essential.

Policy 5.2b: Maintain updated commercial housing mitigation requirements

Adopt and regularly update the employee housing mitigation requirements to ensure commercial development **fully mitigates** its demand for employee housing. *Different people may have different interpretations of “fully mitigates.” Does it mean “meeting a certain percentage of need” or does it mean “providing for all the demands that it generates”? Anything less than “providing for all demands” will incrementally affect our ability to reach a 65% goal.*

Policy 5.2c: Facilitate efforts by commercial development to voluntarily provide accessory workforce housing units

Evaluate land development regulations to remove unessential obstacles to providing accessory residences as part of commercial development. The town and county should pro-actively reconcile conflicting regulations that can impede the provision of accessory residential units with commercial development.

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Policy 5.2d: Limit additional resort developments

Maintain resort development to currently approved master plans, in order to curb demand for workforce housing related to resort uses. *This policy is inconsistent with policy 6.1a “do not approve new planned resorts.” “Limit additional developments”, “maintain resort development...” and “do not approve new planned resorts” all refer to future policies associated*

with resort zoning; policy language needs to be consistent. Language needs to be clear, such as “No new resort developments will be approved and no existing resorts will expand.”

Principle 5.3—Continue a comprehensive housing approach that includes mandatory requirements, incentives and pro-active initiatives

Why is this Important?

Existing workforce housing in the community has been produced by a combination of approaches.

Among the workforce housing units produced through 2006, about half resulted from the housing requirements placed on developers. Another 22% were produced from incentives allowed in the county and town Land Development Regulations. The remaining units were produced by pro-active

initiatives of the local housing agencies and other groups in the community. Mandatory requirements

placed on new development are based on the increased need for workforce housing that is caused by

a new development. But the community has accumulated a large backlog of demand for workforce

housing over the years that is not attributable to new development. The diverse causes for housing

demand call for both mandatory requirements and incentives to produce workforce housing.

Other

reasons this principle is important are:

Incentives (such as allowing additional floor area or an increase in residential density) will not generate a sufficient amount of housing, but they make a significant contribution.

Legal constraints prevent local government from requiring new development to provide housing to help meet an existing backlog of demand. Meeting this backlog, or catching up, is a role for incentives and various community initiatives. **The amount of workforce housing needed to fully catch up is not advocated** or realistic but expresses the need for multiple approaches.

Current mandatory housing requirements focus on households earning 120% of median income or less, yet most workers with higher incomes are unable to enter the local housing market. These are unrelated. “Most workers” do not have “higher incomes.” See findings of the 2007 Housing Needs Assessment. The number of households who earn too much to qualify for deed restricted housing

but too little to afford market rate housing represents an **important** segment of the community’s middle class. *Define “important”. Is this meant to imply “significant” in terms of percentage or in terms of importance in jobs held?*

Policy 5.3a: Maintain and regularly update mandatory housing requirements

Workforce housing requirements must be carefully **monitored and refined as needed as conditions in the community change over time.** – *How does this relate to “predictable buildout”? – What “conditions” will we allow to be created? We should simultaneously adopt policies that work to reduce the demand for workforce housing as we adopt policies to increase the supply of housing. Through these combined policies, the gap, in terms of “housing demand” versus “housing availability” will be lessened. There are always unforeseen circumstances, but we need to be very strategic about land use decisions given the rate at which they can accelerate housing demands. Policies need to be proactive and comprehensive, not reactive.*

Policy 5.3b: Pursue all available funding opportunities for workforce housing.

Funding examples to pursue include:

Tax credit program;

Grants and dedicated revenue streams such as the fifth cent sales tax;

Bonding;

A mill on the property tax rate, and;

A real estate transfer tax

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Policy 5.3c: Allow a broader workforce population to qualify for deed restricted housing

Broadening the range of incomes that are eligible for deed restricted housing is important to a sustainable population, but should be done while maintaining a uniform effort to provide workforce housing across all income categories. *Proportionate to percentage of total workforce in need or proportionate across categories?* Revise housing guidelines and regulations to expand the range of incomes that are eligible for deed restricted housing.

Policy 5.3d: Permit higher densities of housing in appropriate locations to increase the supply of workforce housing

Permit higher densities of housing in areas identified for increased housing, provided that increased densities are targeted for dedicated workforce, rather than market-rate, housing. - *While we address the “supply” side of workforce housing, there should also be a political will to address the “demand side”. Not only should we permit higher densities of housing in clearly designated areas, we should also reduce commercial potential (or convert commercial potential to residential potential) in other areas. We should adopt policies that work toward common goals efficiently and that do not work to undermine effectiveness of overarching goals.*

Policy 5.3e: Promote financing programs that minimize or eliminate the subsidy for deed restricted housing for higher income workers

Work with local lenders to explore a local lending pool, shared appreciation mortgages, interest buy downs and other strategies.

Principle 5.4—Promote workforce housing as part of redevelopment and infill “Promote” should be “require.”

Why is this Important?

The Town of Jackson is beginning a major phase of redevelopment as numerous small scale and dated buildings will be demolished and replaced with larger, modern mixed-use structures.

Define “numerous.” What kind of balance will be provided so that not all buildings totally shift in scale? Extremely

high land values have created financial incentives for redevelopment, and the many buildings constructed decades ago provide the opportunities for new development. Also, as development opportunities diminish in the unincorporated county, greater development pressures will turn toward

town, further fueling the redevelopment forces. Economic forces and many available properties make

redevelopment inevitable and the community is faced with the challenge of guiding this reconstruction

and infill. This redevelopment creates both a need and an opportunity for workforce housing.

But, the nature of redevelopment should be defined and guided by a community vision – not economic forces. Why does there appear to be an assumption that economic forces should override other factors in the land use planning direction of the Town? And, how does economically-driven redevelopment impact small-rural town character?

Other

reasons this principle is important are:

Commercial uses and high-end market rate housing that will be included in redevelopment

projects will need workers, and these new developments should off-set the newly created needs. *Clarify.*

Much of the existing and planned workforce housing has been produced as part of large scale developments in the unincorporated county, but opportunities for such developments are extremely limited.

The redevelopment of town will provide the majority of the new development in the coming years, shifting from the county to the town the opportunity to generate workforce housing via new development.

Redevelopment and infill efforts should include an increased emphasis on rental housing as well as ownership housing. *There are too many “should”s and not enough “will”s. Define “off-set”.*

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Policy 5.4a: Ensure workforce housing is incorporated in redevelopment and infill areas of town.

Establish a mix of workforce and market housing that mitigates the increased need for employee housing created by the development, as well as taking advantage of the opportunities to provide additional workforce housing. *Fully mitigates?*

Policy 5.4b: Prevent net loss of housing units during redevelopment

Redevelopment should not lead to net loss of housing units due the redevelopment of properties that have pre-existing accessory housing units.

Principle 5.5—Increase predictability for neighbors and developers about future workforce housing development locations and entitlement approvals

Why is this Important?

Recently, workforce housing proposals have been very divisive for the community, for immediate neighbors, and for developers. Obtaining local government approvals typically is long and difficult,

adding expenses to the development of workforce housing. The community and local officials are

faced with difficult decisions of conflicting values and goals with seemingly no room for compromise.

This process for providing housing and making land use decisions serves no one well and an improved and more predictable system is needed. Other reasons this principle is important are:

This Plan will provide both developers and neighborhood residents a level of certainty about the types and amount of development that can occur in various locations.

Debates about workforce housing developments repeatedly reargue the balancing of community goals and reasons why a proposed location is inappropriate for the proposed density. Current housing policies and procedures outline general criteria for selecting locations for workforce housing, but a clearer statement will provide improved certainty for everyone.

Policy 5.5a: Locate workforce housing in town and communities, identified through this Plan and its criteria *Define “communities”.*

This Plan promotes placing workforce housing in appropriate locations, as identified in the town’s framework plan and the county land use plan. Other criteria include:

Workforce housing should occur in the Town of Jackson or county communities, not in remote rural areas of the county;

Workforce housing should be designed as part of mixed-use developments or within neighborhoods, if it meets certain infill and redevelopment criteria so it is in

scale (as determined by the town's framework plan or neighborhood planning efforts);

It **should** not create impacts on identified natural resource areas; and

It **should** have access to transit, proximity to community facilities, and shopping and services.

"Will" needs to replace "should."

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Policy 5.5b: Workforce housing developments will be **consistent with other aspects of this Plan, including overall build out and protection of natural resource areas**

The appropriate levels of density established for workforce housing areas should not increase the overall build out potential for Teton County. Workforce housing areas should not encroach onto **critical natural resource areas** (as defined in Theme 1 of this plan). *This hasn't been defined.*

Principle 5.6—Provide a diversity of neighborhoods and housing types

Why is this Important?

In order to provide a true range of housing choices for our diverse workforce, a variety of housing types (rental, condominium ownership, town home, and single family) **should** be considered.

Ensuring

a variety of housing types in neighborhoods helps provide housing for the workforce as well as provides for a diverse population. A balanced strategy for housing diversity will also include techniques **to protect the patterns of stable neighborhoods.**

Policy 5.6a: The town and communities will include a diverse mix of housing types and neighborhood choices to support the needs of all residents

Town and county communities over time should continue to provide a variety of residential uses ranging from low density neighborhoods to mixed-use and workforce housing. Some higher density districts, designed well, will allow residents and visitors to take advantage of a pedestrian-oriented environment, and accommodate varying needs within our community.

Policy 5.6b: Provide criteria for high density housing location and amenities

High-density housing, including mid- to **high-rise apartments**, condominiums, and town homes, **should be located near transit**, retail, and mixed-use developments (**ideally** within walking or cycling distance) as well as being located near connected streets for optimal accessibility. High-density residential developments **should** also include features, such as a central courtyard, recreational facilities, or other outdoor community gathering spaces, to enhance its attractiveness and livability.

Define "high-rise apartments". The public provided clear direction on preferences for four-story buildings – the majority in all surveys did not support them. "Mid-to high-rise apartments" should not be included.

(Clarify "near transit." Does this mean existing transit?)

Policy 5.6c: New neighborhoods will be located **near services and will have amenities** *Define "amenities." "Near services" should be "near existing services."*

Ensure new neighborhoods are located **near** services, jobs, and schools (**ideally within walking or cycling distance**) to reduce dependence on automobile use. New neighborhoods **should** contain neighborhood parks, recreation areas, playgrounds, sidewalks on both sides of streets and roadways, off-street trails, and other amenities.

Policy 5.6d: Preserve stable neighborhoods

Identify and preserve stable neighborhoods and their patterns and housing stock. *Each and every individual development has a potential to incrementally alter neighborhood “patterns.” As discussed in Theme Four, “stable” needs to be adequately defined to ensure predictability.*

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Suggested Strategies (Theme 5—Diverse Housing Needs)

Examples of techniques to be explored include: purchasing existing homes; purchasing life estates with

the unit becoming workforce housing in the future; providing reverse mortgages with the unit becoming workforce housing in the future; establishing mitigation requirements that apply when existing homes are replaced.

Theme 5 Strategies

Programs to prevent loss of housing - No net loss policy; life estates; reverse mortgages; mitigation for consolidations or replacements of existing homes.

Middle Class/

Workforce

Requirements in LDRs – Establish mandatory requirements for deed restricted housing. Reconcile conflicting LDRs; remove **unessential** barriers All - *Who defines “unessential?”*

Long-term funding sources: consider 2nd cent (7th cent), real estate transfer tax, lodging tax, and/or mill on property tax All
Density Incentives for workforce housing - through increased density and floor area All

Identify **specific locations and densities** for housing; establish **density range (Future Land Use Plan)** **Limit job inducing commercial growth through plan and LDRs.** – *Why isn't this a stated “big picture” policy in this section??*

Funding source for workforce housing program
administration – establish funding source for ongoing program administration and monitoring, such as administration fee at time of workforce housing unit sale
All

Land Banking: Secure land for future workforce housing requirements. All

Possible Indicators (Theme 5—Diverse Housing Needs)

Possible indicators to monitor how well the community is achieving the goals of this theme include:

1. 65% of the workforce will be housed as community residents, **monitor number of workforce housing units and % of workforce** *Monitor how often?*
2. Ratio of commercial square footage to residential units.
3. Ratio of resort/lodging accommodations to residential units.

4. No net loss of workforce housing through redevelopment.
5. Relative cost housing

As themes are better linked in the new draft, it will also be important to incorporate indicators that monitor the effectiveness of addressing community priorities in an integrated way (rather than in isolation, as the above indicators reflect.)

SUMMARY OF COMMENTS on June 2008 Draft “Themes & Policies”
THEME SIX
Provide for a Diverse and Balanced Community and Economy

Big Picture:

This section strongly underemphasizes the role of wildlife and natural resources as essential components of our community identity and economy. The summary of the “theme’s topics” do not even mention conservation, wildlife or natural resources. Natural resources are the “economic backbone” of the region.

This section needs significant changes in language, specifically regarding the importance of natural resources. Perhaps evident in this theme more than any other, there is a general lack of linking different theme issues. Perhaps this is yet to come, but one of the main objectives of this entire planning process was to view community priorities in an integrated way, not in isolation. This document still appears to view themes in isolation. This document also fails to prioritize themes or provide an overarching foundation from which all these are evaluated. Strategic conservation of wildlife and natural resources is central to a land-use planning approach that works to protect our community culture and economy. Why has this been overlooked?

This section also includes a number of vague policies, such as “limit commercial development consistent with the Future Land Use Plan and as a percentage of mixed-use development.” When will we know how much commercial development the Land Use Plans are proposing? “Limit” will mean very different things to different people. Another example is “Commercial and mixed-use development will be sensitive to existing context and design.” This language should also state that quantitative guidelines are essential in defining this “sensitivity.”

Resort-related policies need to be clear. For example, suggested strategies state, “No additional Planned Resort approvals and no expansion of current plans, except to provide employee housing.” Suggestions need to be clear. Would expansion be allowed if some element of the expansion included employee housing, or would expansion be restricted to the form of employee housing units only?

Overall, particularly given its focus on “balance”, this section needs to clearly connect themes. To date, it doesn’t. Both our community and economy will drastically suffer if our wildlife resources are impacted. This fact should be very clear in this theme.

Key Issues:

- In general, there is some overlap with issues addressed in other themes, primarily with those in Theme Two. Perhaps the issues would be clearer overall if the two are addressed more collectively. Or, if you feel there is a strong advantage in separating them, their purposes should be more clearly defined and distinguished.
- Identify the importance of wildlife and natural resource protection for our community and economy.
- This theme repeatedly includes policy language about community balance, but it consistently doesn’t mention conservation or wildlife. For example, Principle 6.2 states, “Balance economic development with workforce housing and community needs.” The principle language should include “wildlife and conservation.”
- This theme needs major work!

Provide for a Diverse and Balanced Community and Economy (Theme 6)

Statement of Ideal

The region will balance its commercial, resort and housing growth, and limit commercial growth that creates additional housing demand and allow for continued viable populations of *all native* species. It will actively support viable local business and support efforts to sustain an agricultural economy. *All resort language needs to be consistent in this document.*

What does the theme address?

The intent of this Plan is to create conditions for a sustainable economy and community that reflect the unique small-town, Western commercial character of Jackson, the wildlife and natural resource values of our residents and visitors, and the outdoor recreational opportunities of Teton County. A sustainable economy is one that is healthy and strong across multiple sectors and that is in balance with other objectives of this Plan for housing and stewardship of the environment. One of the fundamental concepts of this theme is the concept of “community first; resort second” and striving for better balance between economic development and other community needs, including workforce housing. – *and protection of our wildlife and natural resources. The community’s top priority should be mentioned.*

Future actions will recognize the changing trends in the local, regional, national, and global economy (*and climate*) that are affecting the west and the lifestyle choices of its current and future residents. Outdoor-based recreation and tourism will remain an important part of the community’s economy, but tourism is no longer the primary economic “backbone”. *Define the “backbone.” Natural resources are the backbone on which other industries thrive..* This Plan supports maintaining diverse retail, tourism, professional and government, resource, and other sectors to provide quality jobs to residents and maintain a dependable tax base to support services and infrastructure. It also encourages supporting existing and new local businesses that fit Jackson Hole and Teton County and that make it unique. – *What about commitment to environmental stewardship - as not only an ethical obligation, but also an economic strategy?*

Summary of this Theme’s Topics

This theme addresses the following topics:

- Maintain Teton County and Jackson as a “community first and resort second”,

- Balance economic development and workforce housing and community needs (sustainable community), and

- Support diverse economic sectors that fit the region and community.

What about CONSERVATION? NATURAL RESOURCES? All of the above should be measured in relation to their impact on the “backbone” of the region – our natural resources.

Where is this theme a priority?

The Future Land Use Plan depicts locations for commercial, office

and mixed-use development and future housing. Balancing development in designated locations outside of Natural Resource Priority areas and Conservation Focus Areas is a priority of this plan. *Again, define...*

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How does the theme relate to core values?

Environment: Limited commercial growth, predictable growth locations, greening businesses ? ?

Community: Locally owned businesses, housing needs, agricultural viability

How can natural resources not be mentioned in a discussion about a balanced community and economy in Jackson Hole?

Guiding Principles

The following guiding principles support these objectives:

Principle 6.1—Maintain Jackson and Teton County as community first and resort second

Why is This Important?

The 1994 Plan promoted the idea of “remaining a community first and a resort second,” and calls for a balance between resort development and the community.

The sense of community has always contributed to the quality of life in Jackson Hole and continues to be valued characteristic in the face of pressures that are forcing change. *We do have the capacity to manage these pressures so that the change that occurs is positive for our community and ecosystem.*

Since 1994, the community structure has shifted a great deal due to discovery of the community as a highly desired, amenity-rich place, with shifting housing costs and commuting patterns, and five approved resort master plans with over 9,500 projected lodging/residential units.

Despite the resort approvals (anticipated in 1994), the ratio of housing to lodging has grown in favor of housing and the community housing stock is growing faster than lodging growth. However, the housing that has been built has served a recreating, lifestyle population rather than local workers.

To support the idea of a balanced community, this principle suggests that the county and town will not approve additional resorts, will monitor residential growth, and will place additional emphasis and resources on addressing workforce housing and transportation needs. *What about conservation efforts and improving development standards to protect natural resources? The policy language in this Plan is all about development!! “Monitor” residential growth is weak language. Why monitor? Spell it out.*

Policy 6.1a: Do not approve new Planned Resorts

The Future Land Use Plan designates locations where existing planned resorts have approved master plans (including Teton Village, J.H. Golf & Tennis, Snow King (in Jackson), Snake River Canyon Ranch (formerly Astoria Hot Springs), and Grand Targhee). The county and town will not approve additional planned resorts that are not designated on the Future Land Use Plan.

What about expansion? As stated in the previous section, all policies regarding resorts need to be consistent.

Policy 6.1b: Limit new lodging to the Lodging Overlay District and existing Planned Resorts

New lodging and short-term rentals will only occur in the Lodging Overlay and the existing Planned Resorts.

Policy 6.1c: Provide opportunities to develop workforce housing to keep pace with demands of approved resorts

Providing strategies and incentives that focus on increasing employee housing in existing resorts is a critical policy. Planned resorts are major generators of jobs and demand for workforce housing. Key to **the** achieving the community goal of housing 65% of the workforce is the need for resorts to house a substantial portion of their employees through employee housing. *How will these needs be met with already approved master plans? Where will the burden fall?*

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Policy 6.1d: Maintain and support opportunities for new small locally owned businesses and neighborhood businesses

Maintaining local ownership of businesses is a key element of sustaining a community and its neighborhoods. Promoting businesses that share with visitors and residents the unique amenities and qualities of Jackson Hole is important in maintaining the community's character, particularly businesses that promote the non-consumptive enjoyment of the area's outdoor amenities and the community's western heritage, and provide services to nearby neighborhoods. **As the community grows and enjoys greater affluence**, land prices, rents and other economic forces increasingly challenge the sustainability of locally owned businesses, making it necessary for the town and county to seek tools to support small businesses. *Define "greater affluence". How are community expansion and affluence linked?*

Policy 6.1e: Seek ways to facilitate viability of unique locally owned and operated businesses in Downtown Jackson

(Discuss whether to introduce forward-thinking ideas of assisting or subsidizing locally owned businesses, especially on the town square, such as through affordable ground leases. This may still be worth discussing and exploring additional strategies.)

Principle 6.2—Balance economic development with workforce housing and community needs

Why is This Important?

Theme 5 addressed housing and reasons why workforce housing is an important component of a balanced community. Housing is also linked to other themes, such as transportation and economic vitality and sustainability. *What about wildlife habitat protection and conservation?*

Analysis of zoning and buildout suggests that the town, in particular, has much greater capacity for non-residential commercial development than it does for housing—further increasing the imbalance between commercial development and housing.

Some rebalancing will be necessary through the Future Land Use Plan and future zoning (*How has "rebalancing" been applied in the Future Land Use Plan?*) to

Limiting further commercial development to certain locations and then monitor the balance to ensure commercial development will not outpace the community's ability to resolve housing needs, or conflict with other goals, such as wildlife habitat protection.

This Plan strives to balance the economy and social needs in the context of a **healthy Environment**. *The context should include viable wildlife populations.*

Policy 6.2a: Balance quantity of housing, workforce housing, commercial development, resorts, and civic uses (*What about conservation?*)

The town and county will use the Future Land Use Plan and policies of this Plan as the main tools for guiding decisions about development and growth. *and conservation? Where is the planning analysis?* The Future Land Use Plan

provides for a diverse and integrated mix of uses, including a balance of mixed-use and non-residential areas, and locations for housing. The town and county will continue to **actively monitor the levels of new development** - *Has this ever been done?* and reserve or reallocate

lands for future commercial, industrial, and residential areas, as necessary to ensure that an adequate amount of housing for the workforce is provided in pace with job growth, and that job growth does not further “tip the scales” to create additional demand for housing. The town and county will monitor trends in the community using indicators (see Sustainability chapter) to determine if the community as a whole is achieving a more balanced community and land use pattern and meeting its housing goals. *And goals to protect wildlife and wildlife habitat?*

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Policy 6.2b: Limit commercial development consistent with the Future Land Use Plan and as a percentage of mixed-use developments

Commercial and mixed-use areas are important destinations for the town, communities, and region. Commercial and mixed-use is designated on the Future Land Use Plan map in such a way to be central and limit further proliferation of strip commercial development and sprawl. The town and county will approve commercial development only where it appears on the Future Land Use Plan—as either straight commercial or mixed-use category. In addition, the plan and LDRs will aim to limit commercial growth as a percent of total square footage allowed in mixed-use development projects. *Elaborate. Why is limited commercial development so important?*

“Limit” will mean different things to different people. How much?

Policy 6.2c: The Future Land Use Plan identifies suitable locations for light industry and business

The Future Land Use Plan identifies areas suitable for light industry and business. The town and county will only approve light industry where it is designated on the Future Land Use Plan. (Note: The plan may need to identify other areas and add additional criteria to site light industry, even though the 1994 Plan says the County has criteria.)

Policy 6.2d: Encourage mixed-use development with commercial and housing as identified on the Future Land Use Plan (in what proportions?)

Recently geographic modeling of the town indicates it has far more commercial zoning than will be needed to accommodate 20+ years of growth, considering the ratio of residential to commercial zoning. The Future Land Use Plan will allow mixed-use development and encourage desirable increased amount of residential in targeted areas, such as the greater “Y” area. Mixed-use categories will establish minimum and maximum types of residential and non-residential to ensure adequate amounts of housing are built. *When will it be clear what it being proposed?*

Policy 6.2f: Allow small neighborhood-serving commercial if it meets locational and design criteria

This Plan supports local convenience commercial services in proximity of residential developments and in small communities (e.g., Buffalo Valley) if it meets criteria. (Note: Need to establish criteria to ensure compatibility with existing neighborhoods and in small communities and to guide LDR revisions. To be added to next draft of Future Land Use Plan chapter.) Some of the 1994 Plan “Business Conservation” businesses are long-time owners and long-established businesses. This Plan proposes to continue to allow the commercial non-conforming Business Conservation businesses as “non-conforming uses”.

These criteria are critical. Who determines these criteria? Depending on the nature of “neighborhood-serving commercial”, it could actually work against smart planning. In some cases, commercial expansion can also be characterized as sprawl. With this policy, the “devil is in the details.”

Policy 6.2g: Commercial and mixed-use development will be sensitive to existing context and design

The town and county will continue to require quality commercial and mixed-use developments with an appearance that fits the quality of the environment and western character. The “Town

of Jackson” section of this Plan addresses scale, building massing, design character and the fabric of neighborhoods. The town will encourage continued redevelopment of these places as rich, vibrant mixed-use areas through a combination of design guidelines and standards, and possibly incentives. **Commercial and mixed-use areas should be strongly pedestrian oriented, provide ample winter solar exposure and wind protection and summer shade** and use architecture that is inviting and comfortable for pedestrians.

Define “sensitive.” Based on current decision-making, it is clear that that word means very different things to different people. Many recent developments have not been sensitive to the existing context of Jackson.

How do some of the currently proposed building scales “provide ample winter solar exposure”?
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Principle 6.3—Continue to support diverse economic sectors that fit the region and community

Why is This Important?

Jackson Hole and the region’s economic base is becoming more vital and diverse economic base in recent years—shifting from a predominantly tourism-based economy to a variety of sectors.

The economy is enviably strong but is totally dependent on service jobs that tend to be lower paying. *Are our current land-use decisions reinforcing this dependence?*

Diverse economic sectors provide quality jobs and a dependable tax-base.

Challenges include maintaining local businesses and balancing future commercial and retail growth with workforce housing, and supporting agriculture as part of the diverse mix. *What about the natural resources and character of Jackson hole?*

Over time it will be important to be sure that **no one business sector over-dominates.** *Clarify.*

Policy 6.3a: Continue to support businesses that are unique and enhance our “sense of community”

Enhance the vitality of businesses that are unique to Jackson and county communities that enhance our sense of community and identity and maintain a local economic base. Support maintenance and expansion of locally-owned businesses that create not only economic, but also environmental and social benefits.

Policy 6.3b: Promote “Green” businesses

The town and county will promote stewardship of resources and the environment and conservation of resources by business and industry. Promote sustainable business practices that reduce water and energy consumption. *“Promote” is weak language.*

Policy 6.3c: Voluntarily preserve the agricultural economy, western heritage, and character of Alta as well as Buffalo Valley and Kelly

The county will continue to provide for and remove obstacles to agriculture through its codes and regulations and recognize the community’s heritage and western character by seeking ways to support remaining farms and ranches, such as through education and recognition of historical events and practices of ranching. Agricultural use provides an effective means of conserving large intact lands. As the community pursues reduced density in many outlying areas and the preservation of open space, the proper management of the open lands can be supplemented with active agriculture.

Teton County has, in part, a western heritage of farming and ranching. Agriculture was the economic base of Jackson Hole’s original settlers, and that heritage is an important part of the community’s character. Farmland and ranchland is also important for environmental quality in Alta, Buffalo Valley, and Kelly, and other locations in the Snake River Valley.

Policy 6.3d: Diversify economic sectors by attracting higher paying jobs and non-service sector jobs

(Discuss this policy further in the community. The community occasionally discusses the idea of diversifying the economy by attracting higher paying jobs and non-service sector jobs. The

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economy is enviably strong but totally dependent on low paying service jobs. Seeking to diversify may be an unneeded growth stimulus.) *Why do we need additional commercial growth potential?*

Suggested Strategies (Theme 6—Balanced Community)

(Note: The planning team will work with the community to complete the strategies sections during the next phase of work as they relate to policies. Strategies are included in this draft for discussion purposes.)

Theme 6 Suggested Strategies

Use Indicators - Refine and implement indicators of sustainability for decision-making and to monitor plan progress on “balanced community”. Indicators should address the environment and community (social and economic aspects).

Adopt and Use Future Land Use Plan/Amend LDRs - Use the Future Land Use Plan as guide for development locations and quantities. Amend the LDRs to be consistent with directions of the Future Land Use Plan.

Amend LRDs - Modify zoning districts for town to promote workforce residential units in certain commercially zoned areas of town.

No Planned Resorts - No additional Planned Resort approvals and no expansion of current plans, except to provide employee housing. *Clarify what this means. Would expansion be allowed if some element of the expansion included employee housing, or would expansion be restricted to the form of employee housing units only?*

Modify Discretionary Zoning Options - Modify or remove discretionary development options that allow increased commercial development, such as the Planned Mixed Use Development (PMUD), and focus on incentives for housing. *Discretionary options that allow increased commercial development are not appropriate.*

Building Green Program and Codes – Establish programs to recognize “green” businesses and promote energy conservation. Develop a Green Building code.

Agriculture Conservation Programs – Develop program to help conserve viable agriculture and agricultural lands, including possible purchase of development rights to

leverage land trust activities.

Possible Indicators (Theme 6—Balanced Community)

Possible indicators to monitor how well the community is achieving the goals of this theme include:

comments below duplicate Theme 5

1. Ratio of commercial square footage to residential units.
2. Ratio of resort/lodging accommodations to residential units.

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3. Ratio of protected acres of open space to residential units. *???? Wildlife population viability*
4. Agricultural lands and operating ranches in Alta.
5. Number (or %) of businesses practicing green business practices and number of buildings meeting green building standards.

Again, indicators need to reflect theme goals in a more integrated way.

SUMMARY OF COMMENTS on June 2008 Draft “Themes & Policies”
THEME SEVEN
Provide Efficient and Quality Community Facilities and Infrastructure

Big Picture:

As the Planning team outlined, this theme is still in a very rough draft form. It is clear that concrete data for the proposed Plan (buildout range, commercial square footage range, fiscal costs, etc.) are essential to evaluate this theme. As this critical information is clearly provided, the Conservation Alliance will make more substantive comments.

Key Issues:

- In several cases, policy language states that new development should not occur in a manner that increases taxpayers’ cost to services (water and sewer, new schools, and parks, etc.) This is a noble fiscal goal. However, multiple fiscal impact studies prove that growth rarely pays for itself. In short, revenues raised from new developments rarely cover the costs to service them. To ensure that this goal is reached, what fiscal impact/costs of growth models will you use to assess conditions in Jackson/Teton County?

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Provide Efficient and Quality Community Facilities and Infrastructure (Theme 7)

Statement of Ideal

Residents will receive all services the community deems appropriate, delivered at the right time and without waste, in a safe atmosphere. Jackson Hole will be a community with widely-recognized year-round arts, learning, and cultural activities.

In general, this theme needs a lot of work. It is clear that concrete data is essential to evaluate this theme, which to date is not available. As this critical information is provided, the Conservation Alliance will make more substantive comments.

What does this theme address?

Residents and businesses in Jackson and county communities rely on essential utilities and services, such as fire protection and emergency medical treatment, water and sewer delivered efficiently at the right time. The town and county also recognize that the social components, such as schools and educational facilities, libraries, arts and culture, social services, and shared events and activities (community spirit), are important aspects of community desirability and livability. Residents and visitors should continue to have access to essential as well as quality of life services and facilities that build on and **reinforce attributes our unique, safe, and healthy** communities. The levels of service (LOS) for all of the services/facilities, and the number of new facilities or expanded services needed to maintain LOS as the community develops according to the Future Land Use Plan. (Note: The agency heads are key to providing the necessary information, which will also help the planning team refine the Future Land Use Plan.)

Summary of this Theme's Topics

This theme addresses the following topics:

- Adequate facilities and services
- Water and sewer utility
- Solid waste
- Fire Protection and Emergency Medical Treatment (EMT) services
- Schools
- Parks and recreation
- Hospital
- Library
- Arts and culture
- Human social services

This chapter will carry forward the intent of the "Community Facilities" chapter of the 1994 Plan (Chapter 7). We are requesting information from the relevant departments and agencies so we can include the following types of policies:

Where is this theme a priority?

Where the Future Land Use Plan indicates locations of town and **communities**, providing efficient

and quality facilities and infrastructure is a priority.

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1. General goal(s) for the utility or facility as future growth in the community occurs (i.e., the guiding principle).
 2. Relevant policy direction related to that goal to help the town and county make wise land use and growth decisions and avoid adverse affects on the facility or utility service levels. *Natural environment?* This might include level of service standards that should help guide development decisions (if they exist), or suggestions to develop level of service standards or locational criteria for facilities and utilities.
 3. References to relevant functional plans that will provide the detailed facility and utility information.
- (Note: we recognize that utilities or function plans, such as for parks, will contain far more detail than the comprehensive plan will; the comprehensive plan will reference those more detailed plans.)

It would also be helpful to include:

Suggested strategies related to a particular topic and actions that will help achieve the goals (e.g., require land dedication).

Measurable indicators (to town and county can determine if it is meeting this Plan's goals.) (e.g., measure of park land compared to population).

How does the theme relate to core values?

Environment: Growth management

Community: Essential services, educational and health related services, planned neighborhoods, **fiscal health** *Do you intend to conduct a fiscal costs of growth analysis?*

Guiding Principles

The following guiding principles support these objectives:

Principle 7.1—Provide adequate public facilities and services for current and future residents in a fiscally responsible manner

Why is this important?

Placeholder - add

Policy 7.1a: Establish and Maintain Level of Service Standards

Establish adequate level of service and land dedication standards (i.e., for roads, water and sewer, stormwater, fire protection, police protection, parks, and schools). The town and county will coordinate with service providers and other governmental organizations that provide services to community residents to ensure that existing and new developments have adequate services, and that existing public facilities are properly maintained to serve the needs of current and future residents. Develop level of service standards for: fire and EMT, police, parks and recreation, public water and wastewater, solid waste and recycling, library, schools, other public buildings, and transportation. The level of service is defined as the optimum level of service desired from a service provider, which may be different from the current LOS.

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Policy 7.1b: Ensure Concurrent Utilities and Facilities

The town and county and developers will ensure that adequate public facilities are in place or planned for within a reasonable time of the start of a new development (including streets, schools, fire protection, water and sewer, and other services and utilities).

Principle 7.2—Provide adequate water and sewer facilities to meet current and future community needs

Why is this Important?

Ensuring adequate water and sewer service is an essential matter of health and safety for Teton County and Jackson residents. The county and town will continue to ensure that existing customers have high quality services.

New development should not occur in locations or a manner that increases taxpayers' cost to provide water and sewer or that creates unhealthy conditions. *This is a noble fiscal goal. However, multiple fiscal impact studies prove this is rarely the case. What fiscal impact/costs of growth models will you be using to ensure this goal is reached?*

Placeholder for additional utility department input. Will add information about thresholds and capacity to serve additional units and specific locations. **THIS IS CRITICAL.**

Policy x.x. Maintain an adequate level of service for current water and sewer treatment customers

Placeholder - add

Policy x.x. New town-level development will only occur where it can be served with municipal water and sewer and will pay for costs of extending service

Placeholder - add

Principle 7.3—Provide solid waste services while reducing solid waste demand

Why is this Important?

Placeholder

Principle 7.4—Continue to provide adequate law enforcement Level of Service to meet community needs

Why is this Important?

Ensuring adequate staffing and response time for law enforcement is an essential matter of safety and welfare for Teton County and Jackson residents. As traffic increases and as development occurs, the county and town will take measures to ensure that law enforcement continues at a high level of service.

New development should not occur in locations or a manner that increases taxpayers' cost to serve it or creates unsafe conditions. *What fiscal impact/costs of growth models will you be using to ensure this goal is reached?*

Placeholder for police and sheriff policy and level of service input

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Policy x.x. Maintain an adequate level of service and response time for law enforcement

Note: will add goals for response times and quality of service—to be obtained from appropriate departments.

Policy x.x. New building should follow principles in Crime Prevention Through Environmental Design (CPTED) handbook

CPTED principles can be applied easily and inexpensive to building or remodeling and include: (1) natural surveillance, by using features that maximize visibility of people, parking areas and building entrances; doors and windows that look out on to streets and parking areas; pedestrian-friendly sidewalks and streets; front porches; and adequate nighttime

lighting, (2) Territorial reinforcement, with features that define property lines and distinguish private spaces from public spaces using landscaping plantings, pavement design, etc., (3) Natural access control (4) target security, with features such as locks and hinges that prohibit entry, (5) support for neighborhood activities and community surveillance.

Principle 7.5—Continue to provide adequate fire protection and Emergency Medical Services (EMS) Level of Service to provide for community safety and welfare

Why is this Important?

Ensuring adequate response times is an essential matter of health, safety, and welfare (sometimes life or death) for Teton County and Jackson residents. As traffic increases and as development occurs, the county and town will take measures to ensure that emergency services continue to provide adequate response times.

New development should not occur in locations that increases taxpayers' cost to serve it.

Policy x.x. Maintain an adequate level of service and response time for fire protection and Emergency Medical Services (EMS)

(Note: will add goals for response times and quality of service—to be obtained from appropriate departments.)

Principle 7.6—Coordinate to facilitate schools and facilities that meet community life-long educational needs

(Will add revised wording for principal and policy as necessary.)

Why is this Important?

Ensuring adequate schools is a matter of community welfare and quality of life for residents.

If centrally located, neighborhood schools can be accessible by walking, biking, or transit—reducing vehicle miles travel, and increasing safety for students.

Co-locating schools with parks and other civic facilities can increase opportunities for shared facilities and decrease amount of travel between activities.

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The county and town will work with the school district to maintain current schools and ensure that new development is consistent with school district plans and to encourage joint planning with town and county and WYDOT and other agencies for siting new facilities to coordinate with land use and roads.

New development should not increase taxpayers' costs to provide new schools.

What fiscal impact/costs of growth models will you be using to ensure this goal is reached?

Day cares, preschools, and other such facilities should be located near parks and playgrounds.

Other?

Policy x.x: Plan for centrally located school and support high quality school system

The town and county will coordinate with the school district to ensure that new schools are centrally located in neighborhoods (e.g., schools generally should be co-located with parks, trails, and other recreation facilities to provide combined utilization of parks and transportation).)

(Strategies might include: investigate a fee system or land dedication requirements, locating future schools according to certain criteria, size requirements for middle/high school and elementary schools)

Principle 7.7—Provide quality local parks and

recreational facilities to meet current and future community needs

Why is this Important?

Ensuring parks and recreation areas within neighborhoods and communities is a matter of community health and quality of life for residents, and they decrease pressure on public lands outside the community.

If centrally located with schools, parks can be accessible by walking, biking, or transit, providing opportunities to healthy lifestyles.

Co-locating parks and schools can increase opportunities for shared facilities.

New development should not increase taxpayers' costs to provide new parks.

What fiscal impact/costs of growth models will you be using to ensure this goal is reached?

Other? (Discuss possible addition of teen activity center)

Policy x.x: Provide local parks and recreation facilities in the Town of Jackson and communities

Parks and Recreation plan will guide specific locations and levels of development for parks and recreation in the Town and County.

To be added

Principle 7.8—Facilitate local medical facilities in providing excellent medical care to meet the region's health care needs

Why is this Important?

--- start page 75---

Placeholder for hospital policy and level of service input

Principle 7.9—Facilitate high quality library services for current and future community needs

Why is this Important?

Placeholder for library policy and level of service input

Policy x.x. Maintain current level of service for Teton County libraries
(placeholder)

Note: will add goals quality of service—to be obtained from library.

Principle 7.10—Continue to coordinate with arts and culture and private organizations to facilitate world-class community arts and culture

Why is this Important?

Placeholder

Principle 7.11—Coordinate with multiple organization to facilitate adequate health and human services to all residents of Jackson Hole

Why is this Important?

Placeholder

Suggested Strategies (Theme 7—Community Facilities)

Jackson/Teton County - Draft Themes and Policies - Comments

General Comments


(For paper version: This comment form is also available on-line (www.jacksontetonplan.com), with unlimited room to write comments.) To answer these questions, please review the document entitled "Draft Plan Themes and Policies." (June 1, 2008)

The following information is optional.

Name:

Primary Address:

City/Town:

State: 

ZIP/Postal Code:

Country:

Phone Number:

★ Please provide e-mail address.

Email Address:

Do you have general comments about the Plan Themes and Policies document?

☒ Yes

☐ No

Please provide your comments here:

The Jackson Hole Chamber of Commerce strongly supports workforce housing as an integral theme and leading priority of the Jackson and Teton County comprehensive plan. To truly maintain a community first, resort second approach, workforce housing must be given the same priority that other themes receive in the comprehensive plan. Other themes, such as preserving wildlife and scenic corridors, and enough workforce housing to sustain our community, can be met by embracing a balanced approach to preservation and development that reflects effective choices for determining the locations to meet these themes. It is the hope of the Jackson Hole Chamber of Commerce that Jackson and Teton County officials consider all viewpoints in their decision making to arrive at the optimum comprehensive plan. The Jackson Hole Chamber of Commerce, with its diverse membership and member viewpoints, supports a comprehensive plan that establishes a balance among themes including enough workforce housing to create and maintain a sustainable and highly functional community.

Do you have comments about the "Guide to the Plan Update" or "Linking Themes/Sustainability" Chapters? (pages 6 to 14)?

☒ Yes

☐ No

Please provide your comments here:

Page 9: CHANGE the third sentence in the third paragraph under "What is a 'Sustainable' Jackson/Teton County" to read " . . . and threatens to erode the functioning and sense of community and social diversity that characterize a sustainable community." CHANGE the last sentence on page 9 to read "Given these trends and local issues, Jackson and Teton County are recognizing that it's social, economic, and environmental 'elements' are linked into a triple bottom line, and that . . ."

Jackson/Teton County - Draft Themes and Policies - Comments

Theme 1: Promote Stewardship of Wildlife Habitat...

Do you agree with the "Statement of Ideal" for Theme 1, which states: "Maintain viable populations of native species ("species of concern") and preserve scenic vistas, and use resources in the most efficient way possible"?

☐

Generally agree

☐

Neutral

☐

Generally disagree

Please provide comments here:

Do you agree with the Principles and Policies for Theme 1: "Promote Stewardship of Wildlife Habitat and other Environmentally Sensitive Areas and Resources"? (Note: Please review pages 15 to 23 to provide your feedback.)

	Generally agree	Neutral	Generally disagree
Pr 1.1--Wildlife habitat, natural systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.2--Watersheds, streams, rivers, wetlands	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.3--Clean water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.4--Scenic and dark night skies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.5--Hillsides	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.6--Air quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.7--Restricted development in hazard areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.8--Agricultural resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.9--Public access to public lands	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.10--Sustainable use of resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 1.11--Energy efficiency/reduce greenhouse gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide your comments about Theme 1 here. (Note: Reference specific principle and policy numbers where possible or suggest new principles/policies.)

Do you have comments about the "Suggested Strategies" or "Indicators" for Theme 1? (pages 24 to 27)

☐

Yes

☐

No

Please provide your comments here:

Jackson/Teton County - Draft Themes and Policies - Comments

Theme 2: Manage Growth Responsibly

Do you agree with the "Statement of Ideal" for Theme 2, which states: "Use lands in a way that meets needs of residents and visitors, while allowing for viable populations of all native species and the preservation of scenic vistas. Limit growth to that specified by this Plan--directing most new growth into the town and communities."

☐ Generally agree ☐ Neutral ☐ Generally disagree

Please provide your comments here:

Do you agree with the Principles and Policies for Theme 2: "Manage Growth Responsibly"? (Note: Please review pages 28 to 36 to provide your feedback.)

	Generally agree	Neutral	Generally disagree
Pr 2.1--Predictable development and conservation pattern	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 2.2--Town of Jackson/mixed-use centers appropriate locations for town-level development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 2.3--Preserve and enhance communities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 2.4--Civic spaces/social functions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 2.5--Historic structures and sites	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 2.6--Current level of service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 2.7--Intergovernmental coordination--growth management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide your comments about Theme 2 here. (Note: Reference specific principle and policy numbers where possible, or suggest new principles/policies.)

Do you have comments about the "Suggested Strategies" or "Indicators" for Theme 2? (pages 37 to 38)

☐ Yes ☐ No

Please provide your comments here

Jackson/Teton County - Draft Themes and Policies - Comments

Theme 3: Develop a Comprehensive, Integrated Transportation Strategy

Do you agree with the "Statement of Ideal" for Theme 3, which states, "Allow residents and visitors to travel safely, efficiently, and economically, shifting away from auto-dependence and increasing choices and opportunities for transit use, walking, and bicycling. The transportation system allows for viable populations of native species, the preservation of scenic vistas, and safe, unimpeded movement of wildlife"?

☐

Generally agree

☐

Neutral

☐

Generally disagree

Please provide your comments here:

Do you agree with the Principles and Policies for Theme 3: "Develop a Comprehensive, integrated Transportation Strategy"? (Note: Please review pages 39 to 45 to provide your feedback.)

	Generally agree	Neutral	Generally disagree
Pr 3.1--Coordinated land use and transportation planning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 3.2--Multi-modal transportation system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 3.3--Consistent funding mechanism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 3.4--Safe and interconnected roadway network/balanced with community goals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide your comments about Theme 3 here. (Note: Reference specific principle and policy numbers where possible, or suggest new principles/policies.)

Do you have comments about the "Suggested Strategies" or "Indicators" for Theme 3? (pages 45 to 46)

☐

Yes

☐

No

Please provide your comments here:

Jackson/Teton County - Draft Themes and Policies - Comments

Theme 4: Uphold Jackson as "Heart of the Region"

Do you agree with the "Statement of Ideal" for Theme 4, which states: "Residents and visitors will continue to rely on Jackson as the center of the region and primary location for jobs, housing, shopping, educational, and cultural and arts activities"?

☐

Generally agree

☐

Neutral

☐

Generally disagree

Please provide your comments here:

Do you agree with the Principles and Policies for Theme 4: "Uphold Jackson as 'Heart of the Region'"?
(Note: Please review pages 47 to 53 to provide your feedback.)

	Generally agree	Neutral	Generally disagree
Pr 4.1--Town of Jackson as population center of the region	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 4.2--Jackson as civic and cultural heart	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 4.3--Vital retail/mixed-use core in Jackson	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 4.4--Healthy neighborhoods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 4.5--Vibrant, attractive public places	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 4.6--Town transportation network w/ accessibility and choices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide your comments about Theme 4 here. (Note: Reference specific principle and policy numbers where possible, or suggest new principles/policies.)

Do you have comments about the "Suggested Strategies" or "Indicators" for Theme 4? (pages 53 to 54)

☐

Yes

☐

No

Please provide your comments here:

Jackson/Teton County - Draft Themes and Policies - Comments

Theme 5: Meet Our Community's Diverse Housing Needs"

Do you agree with the "Statement of Ideal" for Theme 5, which states: "Meet the housing needs of at least 65% of our community's workforce in Teton County, Wyoming"?

☒ Generally agree ☐ Neutral ☐ Generally disagree

Please provide your comments here:

Page 55: The percentage of 65% of the community workforce is the minimum, not optimum, for a viable, functioning community to survive. CHANGE the third line under "Summary of this Theme's Topics" to read "Give priority to workforce housing as part of town redevelopment; ", not "Promote housing . . ."

Page 56: CHANGE the third bullet under "Environment" to end with "and associated carbon emissions." CHANGE the third bullet under "Community" to end with "and volunteering." CHANGE the second paragraph check marked f th b tt t d ith" h % i d ff d bl " CHANGE th l t t i th l t

Do you agree with the Principles and Policies for Theme 5: "Meet Our Community's Diverse Housing Needs"? (Note: Please review pages 55 to 62 to provide your feedback.)

	Generally agree	Neutral	Generally disagree
Pr 5.1--Maintain community's middle class and stable resident workforce	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 5.2--Quantitative goal for maintaining 65% of resident workforce	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 5.3--Comprehensive housing approach	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 5.4--Workforce housing as part of redevelopment and infill	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 5.5--Predictability about locations/process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 5.6--Diversity of neighborhoods and housing types	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide your comments here. (Note: Reference specific principle and policy numbers where possible, or suggest new principles/policies.)

GENERAL COMMENTS: Principle 5.1 - a definition of our community's "middle class" should be provided. Principles 5.3 and 5.6 - Diversity of housing types and a comprehensive approach should include rentals as well as ownership units. Principle 5.4 - the percentage of offset of newly created needs from redevelopment projects should be quantified in the comprehensive plan.

Do you have comments about the "Suggested Strategies" or "Indicators" for Theme 5? (page 62)

☒ Yes ☐ No

Please provide your comments here:

Suggested Strategies: CHANGE the last sentence segment in the sentence for Programs to prevent loss of housing" to read "offset and mitigation for consolidations or replacements of existing homes." Add the following Strategy: "Equity Sharing: Promote employer-employee equity sharing of workforce housing" Add the following Strategy: "Convert commercial lodging to workforce housing - through public and private partnerships"

P ibl l di t Ch th fi t ibl i di t t d "A i i f 65% f th kf "

Jackson/Teton County - Draft Themes and Policies - Comments

Theme 6: Provide for a Diverse and Balanced Community and Economy

Do you agree with the "Statement of Ideal" for Theme 6, which states: "The region will balance its commercial, resort, and housing growth, and limit commercial growth that creates additional housing demand to allow for continued viable populations of species. It will actively support viable local business and support efforts to sustain an agricultural economy."

☒ Generally agree ☐ Neutral ☐ Generally disagree

Please provide your comments here:

Do you agree with the Principles and Policies for Theme 6: "Provide for a Diverse and Balanced Community and Economy"? (Note: Please review pages 63 to 68 to provide your feedback.)

	Generally agree	Neutral	Generally disagree
Pr 6.1--Jackson and Teton County as community first and resort second	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 6.2--Balanced economic development with workforce housing and community needs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pr 6.3--Diverse economic sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide your comments here. (Note: Reference specific principle and policy numbers where possible, or suggest new principles/policies.)

Without commensurate proportional workforce housing, increased commercial growth may further increase the percentage of workforce that resides outside of Teton County, and heightens the trend towards Jackson and Teton County being a resort first and community second.

Do you have comments about the "Suggested Strategies" or "Indicators" for Theme 6? (page 68)

☐ Yes ☐ No

Please provide your comments here:

Jackson/Teton County - Draft Themes and Policies - Comments

Theme 7: Provide Efficient and Quality Community Facilities and Infrastructure...

Note: The principles and policies are incomplete for this theme. Please provide your general comments. You will have opportunities to review draft policies later in the summer.

Do you agree with the "Statement of Ideal" for Theme 7, which states: "Residents will receive all services the community deems appropriate, delivered at the right time and without waste, in a safe atmosphere. Jackson Hole will be a community with widely-recognized year-round arts, learning, and cultural activities."



Generally agree



Neutral



Generally disagree

Please provide your comments here:

Do you have other general comments about services, facilities, and infrastructure that you would like to see incorporated into the principles and policies of this theme?



Yes



No

Please provide your comments here:

August 11, 2008

Teton County Board of County Commissioners
Teton County Planning Commission
Town of Jackson Town Council
Town of Jackson Planning and Zoning Commission

To whom it may concern:

This memo has been drafted to provide preliminary comment on the draft Jackson Teton County Comprehensive Plan from the perspective of the Jackson Hole Community Housing Trust.

The Housing Trust is a private non-profit organization dedicated to enriching community character, encouraging social and economic diversity, and preserving the unique qualities of our valley by building and advocating for affordable home ownership. The Housing Trust was established in 1992 and in that time we have facilitated the construction or acquisition of 99 permanently deed restricted homes. In the next few years, we plan to build another 70 affordable homes for dedicated members of our workforce.

While past efforts have achieved solid results and have provided affordable homes for our local workforce, it is clear that much more affordable housing will be needed to keep the community vibrant and the local economy healthy in the years to come.

Linking Themes

The provision of housing opportunities and mixed-use neighborhoods is the most prominent thread linking themes in the draft Comprehensive Plan. The following quote on page 9 summarizes the link between sustainable community and affordable housing:

“The value of creating a sustainable community in Jackson and Teton County stresses the need to maintain the community’s middle class in the face of profound forces that are increasing housing prices.”

Chapter Four speaks to the importance of keeping the Town of Jackson as the heart of our community. Chapter Six identifies the opportunity that exists within the Town of Jackson to shift zoning from commercial, which is in over supply, to a diverse array of residential housing opportunities, which are in short supply. This approach will also help build neighborhood and community while fostering the development of local, convenience commercial as the residential base increases in the Town. In this chapter, policies 6.2a and 6.2d connect affordable housing with the concept of Jackson as the heart of our community. On page 10, the importance of linking the themes is stressed.

“Our core value is that Jackson and Teton County will minimize the footprint of development and conserve the natural environment, while striking a sustainable balance of community values – social and economic.

Using this plan means recognizing the locations where certain policies are priorities, and not using the policies in a piecemeal way. No one policy should be taken out of context; each theme and corresponding policy needs to be considered as they relate to the future Land Use Plan and balancing environment and community priorities.”

Meet Our Community’s Diverse Housing Need

Chapter Five presents an excellent outline of concrete actions that can be enabled through the Comprehensive Plan. It is a credit to those who drafted the plan that principles and policies related to housing and specifically, affordable housing, are so complete and well thought out. Simply put, it is the view of the Jackson Hole Community Housing Trust that if all the principles and policies in Chapter Five were followed, it is very likely the challenge of meeting the community’s diverse housing needs would be met.

An understanding that housing solutions involve all sectors of the community is demonstrated in the quote from the beginning of Chapter Five:

“The magnitude and complexity of the workforce housing issue calls for a multi-faceted approach, involving the private sector, non-profit agencies, local government, employers and residents. This also increases acceptance, as the burden of housing is shared across many parts of the community to avoid disproportionate impact on any single segment.”

Every principle and policy in Chapter Five, if pursued, will contribute to the affordable housing solution for Teton County. The Jackson Hole Community Housing Trust will gladly participate in setting some targets for the number and type of affordable housing units required. This work can and should be done in collaboration with the Teton County Housing Authority, Habitat for Humanity, local employers and residents so that a diverse, united group may identify appropriate zoning in existing neighborhoods.

We do have a few constructive suggestions for improving this chapter.

- The term “Workforce Housing” is extensively used in this document and is defined in a sidebar on page 55. However, use of this term is somewhat misleading. We would suggest that most references to the development of **“workforce housing”** in this section be replaced with simply **“housing”**. Policies 5.5a and 5.5b, are based on the primary principles of smart growth, and accordingly should apply to all housing development, not just workforce housing. Moreover, we caution against creating the impression that workforce housing must meet a different, more strenuous test than free market housing.
- Consider modifying 5.1a to read “Preserve existing **rental** stock that currently houses the workforce”. This suggestion is based on an understanding that it is likely financially impractical to convert existing free market housing into subsidized, deed restricted ownership housing, whereas the preservation of affordable **rental** housing appears to be a much more practical solution.

- Also, consider two additional bullets in Section 5.1b :
 - Identify a recurring, predictable revenue stream for the construction of affordable housing.
 - Create a 5-Year Strategic Housing Plan for Teton County coupled with an action plan that utilizes the strengths of all three housing organizations.

The housing challenges facing our community, and our collective response to the issues, will shape the future of Jackson Hole for generations to come. Innovative, collaborative, bold solutions will be necessary if we hope to secure a stable future for our community.

The Jackson Hole Community Housing Trust fully supports the Comprehensive Plan process and we look forward to providing further support and input as the process unfolds.

Sincerely,

Anne Cresswell, Executive Director
Jackson Hole Community Housing Trust