



April 20, 2009

Jackson/Teton County Comprehensive Plan Planning Team
c/o Jeff Daugherty, Tyler Sinclair, Alex Norton, Jeff Noffsinger
cc: Town Council, Board of County Commissioners, Town & County Planning Commissions
Re: Comp Plan Update - Public Input Regarding Support for Overall Limited Growth Potential

Dear Planning Team,

On behalf of the Jackson Hole Conservation Alliance, thank you for the opportunity to provide comments regarding the Comp Plan Update. We appreciate your continued efforts on what is inevitably a very complex planning exercise for our community. At a future date, we will provide comments specific to the new draft released on April 13. However, this correspondence directly addresses the planning team's repeated assertions that our community did not voice support for a "no growth scenario". The team's conclusion is particularly concerning given that it appears to be used as such a strong basis for the direction of the new draft.

The Conservation Alliance respectfully disagrees with this analysis of public comment regarding preferred overall development potential for Teton County and the Town of Jackson. Below are comments to clarify our position.

1. **"No Growth" Scenario versus "Least Growth" Scenario**

First, based on our review, the public has never been asked questions regarding a "no growth" scenario during this public process. The title of the (assumed) scenario was "Scenario D: Least Growth Focus," and questions regarding a rating of preferences for different scenarios (A-D), to our knowledge, were asked only at one public meeting (January 2008). Also, since "no growth" and "least growth" have different meanings and consequences, it is important to distinguish between the two concepts.

2. **Polling indicates strong community support for the "Least Growth" Scenario & Limiting Growth**

Inaccuracies in scenario wording aside, polling did not indicate "a lack of community support" for this scenario as has been described in community presentations. Our review of the different sources of public input data indicates strong community support for limiting overall growth.

Following are some examples of data and resources that have led us to this conclusion.

a. Public Meeting – St. John’s Episcopal Church, January 2008: Scenario Preferences

At the conclusion of the community presentation in January 2008, attendees were asked to rate their preferences for four scenarios.

%	Wildlife/ Conservation	Compact Centers & Housing	Jackson “Town as Heart”	Least Growth
Strongly like	50	21	40	40
like	32	21	34	13
neutral	5	9	12	11
dislike	7	19	12	17
Strongly dislike	6	30	2	19

Several conclusions can be drawn from this polling, particularly when looking at the assumptions of the various scenarios. However, in order to focus on the specific issue of this correspondence, the majority of the respondents (53%) either strongly liked or liked the “Least Growth” scenario. This is hardly “no support.” And, given a substantial level of neutrality, only 36% of the public disliked this scenario. (In fact, a higher percentage of the public (49%) disliked the “Compact Centers & Housing” scenario, which interestingly most strongly resembles the preferred land use pattern of the new draft.)

Notably, the “Wildlife/Conservation” scenario, which was either strongly liked or liked by 82% of respondents, was described as follows: “This scenario would result in lower potential growth in Teton County, with limited or no expansion of county nodes... No additional development would occur in the South Park area, beyond that allowable under current zoning.” While we recognize that a preferred scenario of the new draft may include different elements of various scenario descriptions, it appears misleading to imply that the public has voiced support for additional growth, rather than reduced or density-neutral land-use planning valley-wide. In general, to be successful, wildlife protection and habitat conservation would require “lower growth levels” as indicated in the “Wildlife/Conservation” scenario description.

b. Public Surveys – Public meeting, online, phone

Below are questions and responses from community polling that *most specifically* regard growth potentials.

- **Which goal do you think is higher priority for Jackson and Teton County?**

%	online	public meeting	phone
Limit overall growth in the valley	48.6	56.3	53.2
Build more deed restricted workforce/affordable housing	33.9	23.2	36.5
equally important	15.1	20	10.3

The highest percentage of respondents, in all cases, supports limiting overall growth as the higher priority.

- **Limit growth and development in the county overall, even if it reduces the ability to provide deed restricted workforce/affordable housing in the Valley.**

%	online	public meeting	phone
Strongly agree	27.3	40.7	20.4
agree	19.4	21.7	30.6
neutral	9.6	5.2	10.7
disagree	23.7	15.5	26.2
Strongly disagree	19.4	16.0	12.0

Across all surveys, more people agree with this concept than disagree.

- **Make zoning changes to eliminate all density bonus options (i.e., PUDs, ARUs,) to protect natural resources and rural character.**

%	online	public meeting	phone
Strongly agree	23.5	54.4	n/a
agree	21.3	15.4	
neutral	16.7	7.1	
disagree	18.3	11.5	
Strongly disagree	11.0	8.8	
Don't know	9.2	2.8	

A higher percentage of respondents support lowered development potential through the elimination of density bonus options.

- **The county's total buildout should be increased (e.g., allow more development overall) as an affordable housing strategy.**

%	online	Public meeting	phone
Strongly agree	10.9	8.7	13.9
agree	15.5	10.3	37.2
neutral	11.4	6.0	12.8
disagree	22.2	21.2	23.8
Strongly disagree	37.3	50.5	12.3
Don't know	2.8	3.3	

Few respondents agree with this statement in two surveys and 51% of respondents agree in the phone survey. Notably, only 8.7 – 13.9% of respondents “strongly agree”.

- **Set a restriction on the amount of annual growth allowed (e.g., 1 or 2% increase per year).**

%	online	public meeting	phone
Strongly agree	26.1	35.2	16.5
agree	27.9	23.3	31.5
neutral	16.4	3.8	13.3
disagree	16.9	18.9	28.7
Strongly disagree	8.4	17.6	10.0
Don't know	4.4	1.3	

Across all surveys, more respondents agree with this strategy than those that disagree.

- **Limit development overall in rural parts of Teton County and limit redevelopment of Jackson.**

%	online	public meeting	phone
Strongly agree	20.3	32.0	19.9
agree	20.8	21.7	40.9
neutral	11.6	4.6	9.6
disagree	28.9	21.7	20.2
Strongly disagree	16.2	18.6	9.4
Don't know	2.7	1.6	

A significantly larger average of respondents support this concept (51.9 versus 38.3) across three surveys. Specifically, 41.1, 53.7, 60.8% agree and 45.1, 40.3, 29.6% disagree. In all cases, more respondents "strongly agree" than "strongly disagree".

- **Increase the provision of deed-restricted workforce/affordable housing as a priority over additional commercial or resort development.**

%	online	public meeting	phone
Strongly agree	41.3	50.8	33.4
agree	31.5	26.4	37.6
neutral	10.3	7.3	12.2
disagree	7.7	4.7	11.1
Strongly disagree	7.2	10.4	5.7
Don't know	2.4	0.5	

Specific to commercial development potential, this polling suggests very low community support for additional commercial development (particularly within the context of workforce/affordable housing shortages).

c. Other Community Polling

A number of recent written comments and a recent community survey suggest similar findings to those in the Comp Plan Update polling. Below are a couple of examples:


- **Summary of Public Comment Received Outside of Formalized Comment Processes**
According to agenda documentation prepared for the September 2008 JIM meeting, which included a “summary of comments received outside of formalized comment processes”, buildout was a top category in terms of frequency of submission. This frequency suggests a strong public concern about growth potentials. Recognition of the importance of this topic was confirmed in the planning team’s October 2008 newspaper ad summarizing public comment. The ad stated, in the second bullet point, that “buildout should be clearly identified and provide guidance in policy creation.”
- **Teton County Citizen Survey - October 2006 - National Research Center**
The survey included the following relevant finding:
The rate of population growth in Teton County was viewed as “too fast” by 73% of respondents, while 2% thought it was “too slow.”

In summary, based on our review, a sampling of which we have presented in this memo, we question the planning team’s implication that citizens have voiced support for a new “growth-based” Comprehensive Plan. It appears that there is strong public support for limiting or reducing development potential; this support should be reflected in the foundation, direction, and language of the plan. If there is other data available, please let us know.

Many in our community strongly believe that the sustainability of Jackson Hole does not depend on continued expansion of development potential. As we have stated, and will continue to clarify in our future comments on the new draft, **our community’s top priority, to protect wildlife, will not be achieved through a focus on development pattern *alone*. We must be willing to address, in a meaningful way, how the *amount* of development (residential and commercial) will affect our ability to uphold community priorities. Ultimately, we cannot grow our way out of growth-related problems.**

Please contact us with any questions, and thank you again for your efforts.

Sincerely,



Franz Camenzind
Executive Director



Kristy Bruner
Community Planning Director