

July 24, 2015

Board of County Commissioners  
Jackson Town Council

RE: Alliance Comments on the 2015 Annual Indicator Report and FY 15-16 Implementation Program

Thank you for the opportunity to comment on the 2015 Annual Indicator Report and the FY15-16 Implementation Program.

#### FY15-16 Implementation Program

We are in support of the FY 15-16 Implementation Program and urge you to move forward with continued implementation of our Comprehensive Plan. Toward that end, we urge you to support the funding in the Implementation Program for updates to the Natural Resource Regulations and Wildlife Friendly Fencing (WFF). Please see our attached letter on the importance of updating the WFF provisions. We have worked with a diverse group of technical experts to draft state-of-the-art proposed improvements to these provisions, in order to help move this work element along. We are also preparing recommendations and best practices for your consideration as part of the Natural Resources Regulations update.

#### 2015 Annual Indicator Report

We thank staff for their hard work on compiling the draft Indicators Report. It's important for our community to consistently measure our progress toward our shared vision of a better future.

We have concerns about the build-out discussion in the Indicator Report and recommend you hit the pause button on this piece of the report. This pause will allow adequate time for the resolution of errors and differing interpretations of Comprehensive Plan policies.

The Annual Indicators Report is a measure of progress on benchmarks of

Comprehensive Plan implementation. It is not a policy document, and thus it is not an appropriate vehicle to correct math or methodology errors, or to interpret policy.

It has come to our attention in the District 2 staff report, this 2015 Indicator Report, and through meetings with staff, that staff has found errors in the data behind the 2009 Build Out Analysis, and that the build out numbers in Table 8 and Table 9 of Appendix B of the Comprehensive Plan may be incorrect.

In the District 2 staff report and the 2015 Indicator Report, staff recommended a way to correct these errors. We applaud their efforts to highlight this issue, and appreciate the hard work they have already put into fixing the mistake. However, we believe this issue warrants detailed review and discussion by our elected representatives.

Since this math and these numbers are crucial to how we allocate density and development potential in all the Town and County districts, we request that staff investigate the methodology that lead to the errors, publically explain how the errors occurred, and then make recommendations for resolving the errors. If needed, please support staff with additional resources such as a reconvening of the Build Out Task Force or retaining a consultant.

Once staff publishes corrected numbers, we would encourage you to update the Comprehensive Plan Appendix B with those correct numbers. This will keep the math clean and clear, and we will know what we are measuring against in the indicators reports and what we are planning for in all the Town and County districts. The Comprehensive Plan is the policy document where such information is retained, not the Annual Indicators Report.

Furthermore, the errors should be corrected consistent with Comprehensive Plan Policy 3.1.a: "Limit development potential to protect community character." We believe that the only appropriate way to

interpret Policy 3.1.a is that it limits development at the levels allowed under the 1994 LDRs. This is also backed up by language in the current Indicators Report: the goal for the Build out Indicator is “Less than 1994 levels” (pg. 3). We do not believe there is justification to significantly increase our build out goal beyond 1994 levels. For example, increasing our build out goal by another five million square feet of commercial development clearly goes beyond 1994 levels – and could also harm our community character and ecosystem.

We have attached this specific Comprehensive Plan policy language and Tables 8 and 9, for your convenience.

We are happy to help with the process of vetting the build out numbers methodology and data, and arriving at agreement as to how to move forward to implement our comprehensive plan.

Sincerely,



Mary W. Gibson  
Community Planning Director  
Jackson Hole Conservation Alliance

Cc: Alex Norton, Long Range Planner  
Tyler Sinclair, Planning Director