

September 9, 2020  
Jackson Town Council  
Teton County Board of County Commissioners



**RE: Changes to our Comprehensive Plan (Comp Plan)**

Dear Madam Chair, Mayor Muldoon, Commissioners, and Councilors,

Thank you for your commitment to the Growth Management Program / Comp Plan Update. The Growth Management Program was “triggered” when our community grew more than 5% since the 2012 Comp Plan adoption. We believe that the response to significant growth should not be *enabling yet more growth*, but rather taking even better care of our community members and ecosystem.

**Please keep these positive changes:**

- Ecosystem stewardship indicators and targets (1.G.S.1 & 1.G.S.2). Our community has invested significant time and resources into creating the [Housing Action Plan](#) and the [Integrated Transportation Plan](#) to implement the broader vision of our Comprehensive Plan. Both of these focused plans set out clear, measurable goals – 65% workforce housing and 11% less growth in vehicle miles traveled. But though ecosystem stewardship is one of the three common values, and it is at the core of our vision, *we have no ecosystem / conservation plan or goals*. So how can we know if we’re making progress or losing ground? We need clear goals and metrics, and a Conservation / Ecosystem Action Plan to outline a prioritized path forward.
- New climate goal and action plan (2.G.S.1 & 2.G.S.2). The International Panel on Climate Change reports that we have only 10 years to change our emissions trajectory and avoid catastrophic impacts. The town has adopted a goal to be Net Zero by 2030 – let’s reflect that goal in the county and the joint Comp Plan. And beyond that, let’s craft a climate action plan, hire staff to lead the effort, and report on progress annually.
- Staff ecologist (1.1.S.8). The [conservation community has long asked for](#) staff in local government that would see directly to our plan’s vision to “preserve and protect the area’s ecosystem” (whether an ecologist, conservation planner, or sustainability planner). We support creating a Town position focused on sustainability and climate goals and a County planning position focused on ecosystem / land stewardship / water quality. A staff member prepared to comment on the many projects coming at us (the Bridger-Teton National Forest Plan, transfer of the Bureau of Land Management parcels along the Snake River, implementation of the Wildlife Crossings Master Plan) and participate in the many coalitions (Clean Water Coalition, Systems of Conservation, etc.) would be of immediate value and impact.

**Protecting the wildlife, wild places, and community character of Jackson Hole.**

685 S. Cache St. • P.O. Box 2728 • Jackson, WY 83001 • (307) 733-9417 • [info@jhalliance.org](mailto:info@jhalliance.org) • [JHAlliance.org](http://JHAlliance.org)

- Transportation (7.2.S.3, 7.2.S.6, etc). Please prioritize investments in alternatives to traffic congestion by adding language such as “we and our partners will not build new roads or new lanes on existing roads *until after* we fully implement the transit/walk/bike strategies in the Integrated Transportation Plan and can measure the success of those efforts.” Please add strategies to hire a transportation director, prioritize the creation of an Regional Transportation Planning Organization (as [called for](#) by many local organizations), and create a comprehensive, integrated corridor plan for Highways 22 and 390 before WYDOT does it for us.

**Please make the plan better by making these changes:**

- Improve Northern South Park (3.3.S.5 & Subarea 5.6). We support a neighborhood plan that prioritizes a variety of housing types, with affordability for a range of incomes; permanently protected open space; best practices for climate and environmental sustainability; and encourages more transportation choices. Please add language directing establishment of a “hard border” / “green wall” south of town that would preventing continual sprawling development in coming decades. And to preserve the conservation goals originally outlined for Subarea 5.6, please add: *“The goal of the community is to link development with permanent open space conservation, by transferring development into the subarea from a Conservation or Preservation Subarea.”*
- “Uncheck” 3.1.S.2: explore tools for transferring development. We have not yet adequately explored these tools. If we want to move away from controversial, discretionary upzones toward predictable well-thought-out development of our Complete Neighborhoods, while respecting our vision to preserve and protect the area’s ecosystem and rural areas, we must explore true Transfer of Development Rights / Purchase of Development Rights programs. The Floor Area Option tool allows transfers between rural parcels and doesn’t serve its intended purpose of “conservation and stewardship.” And while we have the CN-PRD tool – specifically intended for Northern South Park development in exchange for rural land protection – large landowners aren’t using it. *Please add a strategy (add a 3.1.S.8) to explore a true TDR or PDR program, based on what works in peer communities.*
- Add a policy that upzones must either transfer development rights or achieve 100% affordable housing (add a new Policy 3.5). A rezone should not be a free ride to more development potential when other tools exist or could be created. Creating new density should only be considered when it doesn’t threaten our growth caps and when it supports our values of ecosystem stewardship, growth management, and quality of life. Newly-created development potential should either be permanently-affordable to local workers or offset with true conservation.
- Add a policy that infrastructure to support new development (transportation, water, and sewer, etc) should be planned before any new density is granted (add a

new Policy 3.2.g). Permitting new development without appropriate wastewater or transportation infrastructure will only pass the costs to taxpayers in the future, as we've seen with Hoback's contaminated water and the need for a Specific Purpose Excise Tax measure to fix Gregory Lane.

- Reference and explain the relationship between incentive tools and our growth caps (add a 3.1.S.7). Many of our community members don't understand the 2015 "transfer" of potential rural PRD incentives to town / Complete Neighborhoods or its connection to the "fill the box" workforce housing bonus in town. The Comp Plan should clearly state that once the ~2500 units are permitted, the town and county will remove the incentive tools, thus preserving our overall buildout cap. Additionally, please clarify that density transfers / incentives can be used for other community priorities such as conservation or historic preservation.
- Add a strategy to adopt bear-proof trash can requirements (add a 1.S.1.10). This was originally included in the natural resource update, which is on hold. Our continued inaction forces agencies to kill bears. We can do better.<sup>1</sup>
- Add a strategy to develop a river and levee management plan (add a 1.S.1.11). With the county set to acquire several Snake River BLM parcels, and with crucial cottonwood forests continuing to decline due to a lack of flooding in recent years,<sup>2</sup> we must proactively plan to protect the habitat around our Wild and Scenic River.
- Adopt a policy recognizing that state trust lands hold ecological value and should be managed with respect to their surroundings, to the extent practicable (add a Policy 1.1.k). State trust lands comprise more than 4,500 acres, with many large parcels located in rural areas or areas with immense ecological value. The state is currently [seeking development proposals](#) to generate the maximum revenue, and the legislation spurring this requires the state to consider our land use plan.
- Better address income inequality. We have the [greatest income inequality in the nation](#), and "if the community does not define how it wants to address income inequality, the inequality will define the community."<sup>3</sup> Our community needs to have frank and intentional conversations about equity, beyond just affordable housing. Please add a strategy to specifically address income inequality, inclusive engagement and representation of our whole community, Indigenous land acknowledgement, equity audits of our policies and programs, and other methods to advance equity and justice for all.

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<sup>1</sup> See "[Biologist: only hibernation abating black bear conflicts](#)," *Jackson Hole News & Guide*, Nov. 6, 2019.

<sup>2</sup> See the "[State of Wildlife](#)" that we commissioned local scientists to complete

<sup>3</sup> See page 21 of the *Comp Plan Seven Years Later: Are We On Track?* (Oct. 2019).

**Please remove these bad ideas:**

- Remove “Evaluate private land recreation needs and management to relieve the impact on public lands” (1.4.S.8). Recreation should be concentrated in areas where it already occurs and where resources are “hardened,” meaning they can sustain the use. Recreation has a broad definition in our LDRs,<sup>4</sup> and adding this policy could lead to exclusive mountain bike parks, zip lines, tennis courts, swimming pools, or venues for outdoor receptions expanded into more areas than they are currently allowed.
- Remove “Evaluate future active use of Karns Meadow” (4.4.S.6). The Town already commissioned an Environmental Assessment of Karns Meadow, which found that it is an “important bottleneck in the movement patterns of wildlife, particularly mule deer, moose and Trumpeter Swans, providing dark skies, cover habitat, nutritious forage and a riparian corridor with limited to no human disturbance during the fall, winter and spring” (p. 29). Karns Meadow will be a key component of the wildlife crossing on Broadway, and is part of the Wildlife Crossings Master Plan that 79% of voters supported on our latest SPET ballot. Changes in development and human use surrounding wildlife crossings will determine their effectiveness. We already know we should not encourage active use, especially in winter. This policy should instead encourage completion of a master plan for Karns Meadow that prioritizes wildlife and habitat protection.

Let’s use this opportunity to make our Comp Plan more actionable, and then invest in staff and resources to make this vision a reality.

Sincerely,



Brooke Sausser  
Community Planning Manager

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<sup>4</sup> See definitions for both “outdoor recreation” and “developed recreation”