

June 2, 2015

Board of County Commissioners

RE: Alliance Comments on the Planning Commission Recommended Draft of the Teton County Rural Area Land Development Regulations

Thank you for the opportunity to comment on Planning Commission recommended draft of the Teton County Rural Area Land Development Regulations (LDRs).

The Alliance believes we have a responsibility to write land use rules that align with our community's vision as articulated in the 2012 Jackson/Teton County Comprehensive Plan. This is a vision of a community with walkable neighborhoods surrounded by protected open space, working agricultural lands, and connected wildlife habitat. A community where at least two-thirds of our families that work here can affordably rent or purchase a safe and healthy home that meets their needs. A community where everyone has the freedom to safely and conveniently get where they need to go on foot, bike, or transit.

We thank staff and the Planning Commission for their hard work in developing a draft of the Teton County Rural LDRs that appears to take important steps toward this vision.

Here's the thing, due to limited analysis regarding expected on-the-ground impacts of these draft regulations, it's unclear if they will accomplish our community's vision and therefore **this draft needs significant improvements and operational details before adoption.**

First, it's unclear how well this draft will advance our community goal of a permanent protection of open space and wildlife habitat in the rural portions of the county. In order to achieve this goal and advance our community's vision, an improved draft of the Rural LDRs staff report should **provide analysis demonstrating how the tools would encourage transfer of development potential from rural to complete neighborhoods, and how the tools would achieve the permanent protection of open space and wildlife habitat in the**

rural portions of the county. There is currently little information showing how the proposed LDRs are likely to be used. Further, it is unclear what programs will put these mechanisms into place to allow for these incentives to be used to promote shifting development from rural areas to complete neighborhoods.

Before adopting the Rural LDRs, the County should develop and have in place a transfer of development potential program which effectively addresses:

- *Wildlife values* by encouraging or requiring density be transferred from higher valued wildlife habitat to lower valued wildlife habitat.
- *Establishment of zoning* in county complete neighborhood receiving areas, and zoning incentives, such as two tiered zoning (like what's being considered for District 2) to encourage sending and receiving property owners to conserve open space now, and not opt to wait for an up zone later.
- *A County open space conservation program* to acquire, hold, steward and manage the open space and wildlife habitat conservation easements generated by this density transfer program.
- *Analysis demonstrating the incentives to the provider of the open space conservation easement is compelling enough* to encourage sending property owners to voluntarily enter into easements for the protection of open space and wildlife habitat.

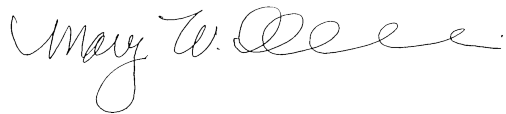
Second, since the update to the Rural LDRs is moving forward before an update to the Environmental LDRs, **it's critical not to make any changes in how the existing Natural Resource Overlay (NRO) and Environmental Assessment (EA) processes apply to resources and land at this time, based on zones or lot sizes or anything else.**

The existing NRO and EA are placeholders for protection of our natural resources and should stay in place until we as a community work together to update our environmental provisions to more effectively implement the goals of the comprehensive plan. In addition, there is no analysis demonstrating the consequences of changing the existing NRO and EA process and any changes should be based on facts and data illustrating on-

the-ground impacts so we can ensure these impacts advance our community's vision.

Thank you again for the opportunity to comment on the Planning Commission recommended draft of the Rural LDRs and please let us know if we can be of any assistance as you move forward with improving this draft.

Sincerely,



Mary W. Gibson
Community Planning Director
Jackson Hole Conservation Alliance

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