March 17, 2017

Dear Jackson Town Council and Teton County Board of Commissioners,

Thank you for the opportunity to comment on the 2017 Annual Indicator Report and FY 17-18 Comprehensive Plan Implementation Work Plan.

We commend Planning staff for the compilation of a well-crafted 2017 Indicator Report. This report provides a relatively thorough snapshot of our community’s progress toward advancing the Comprehensive Plan’s vision to, “Preserve and protect the area’s ecosystem in order to ensure a healthy environment, community and economy for current and future generations.”

In order to improve this report in future years and make it even more effective at measuring our community’s progress toward our shared vision of a better future, please consider:

- **Identifying specific quantitative and qualitative targets for permanently conserved land.** This would help our community both define our conservation goals and measure our progress toward these goals.

- **Adding an indicator measuring the amount of development encroachment in our natural resource protection zone, and undertake an immediate update of portions of the “Evaluation of the Natural Resource Overlay (NRO) in Teton County, Wyoming” report, prepared by of the Jackson Hole Conservation Alliance and the Conservation Research Center of Teton Science Schools.** This would help our community understand how well we’re advancing both Policy 1.1.a: Protect focal species habitat based on relative critical value, and Policy 1.1.b: Protect wildlife from the impacts of development. There is a baseline for this study, completed by the Alliance in 2008, and this should be updated concurrent with the updates to the Natural Resource Protection LDRs to better inform the effort.

- **Undertaking a cumulative impacts study for Teton County, now, to serve as a baseline for future year indicators and to inform the Natural Resource Protections update.** We strongly agree with Planning staff’s conclusion that, “The indicators shown above [in the Indicator Report] give us some insight into the health of our ecosystem, but they are by no means a comprehensive evaluation of the health of the Greater Yellowstone Ecosystem. A cumulative impacts study will help us understand the impacts of development and population growth on our ecosystem and help us develop indicators of ecosystem health.”

- **Convening a stakeholder taskforce of local experts who would deliver recommendations outlining the scope and strategy of a potential program to protect open spaces and improve habitat connectivity in Teton County.** This goes beyond Planning staff’s recommendation to have the Teton County Scenic Preserve Trust accept new easements to provide another option for...
conservation and allow the public to encourage easements in strategic natural resource and scenic resource locations.

The goal of this taskforce would be to deliver a habitat and open space conservation plan with recommendations for your consideration. This taskforce could use existing information, needs assessments, and spatial information to develop recommendations for such a program. Conceptually, this group could recommend some version of a program that leverages and complements existing private land conservation efforts and works innovatively to advance our Ecosystem Stewardship goals, within already adopted policies established in our Comprehensive Plan and existing regulations.

In regards to the FY 17-18 Comprehensive Plan Implementation Work Plan:

- **Please reaffirm your February decision following Planning staff’s recommendation to focus the FY 17-18 Work Plan on the Natural Resource LDRs Update, Housing Mitigation LDR Updates, and Town Zoning.** We strongly agree with Planning staff’s conclusion, “that public input, the election, and the indicator report all support these projects as community priorities.”

- **Given the scope of Snow King Mountain Resort’s Phase 2 Development Plan, please consider building in staff resources, and time in the planning work program schedule, for an update to the Snow King Resort Master Plan.** Specifically, since the Snow King Resort Master Plan for the public and private lands at the base of the ski area is seventeen years old and completely out of date, contains none of the proposed projects included in the Phase 2 Development Plan, and does not anticipate any sort of expansion of ski area facilities, please add to the five year work plan in the appropriate year, staff resources for an update to the Snow King Resort Master Plan to ensure it aligns with our community’s current vision of a better future, the Comprehensive Plan, and updated LDRs. It is geographically defined as part of District 2, and was left out of the District 2 LDRs update.

- **Please strongly consider hiring a team of people to coordinate implementation of the Integrated Transportation Plan (ITP) and advance our community’s transportation goals.** Last year the Alliance partnered with Teton Village Association ISD to convene an inter-jurisdictional working group with representatives from Bridger Teton National Forest, Friends of Pathways, Grand Teton National Park, Jackson Hole Airport, Jackson Hole Chamber of Commerce, Teton County, Teton County Sheriff’s Office, Town of Jackson, START Bus, and Yellowstone-Teton Clean Cities that met four times to generate a list of priorities for addressing summer traffic congestion that involve collaborative inter-jurisdictional partnerships, and recommendations for moving forward on the identified
priorities. The group unanimously agreed that having a team of people (which can start with the hiring of one individual) who focuses on working with all required jurisdictions to make ITP implementation a high priority would result in significant benefits in terms of reducing summer traffic congestion.

Finally, we strongly support the staff recommendation on the Growth Management Program, which is to use this year to evaluate the indicator-monitoring program itself, while finishing the implementations efforts identified, before stepping back to evaluate whether any change is needed to the community’s policies.

Thank you again for the opportunity to comment on the 2017 Annual Indicator Report and FY 17-18 Comprehensive Plan Implementation Work Plan. Please contact us if we can be of assistance or provide any additional information regarding any of these matters.

Respectfully,

Mary Gibson
Community Planning Director