



Teton County Planning Commission
Town of Jackson Planning Commission

March 7, 2019

RE: Comprehensive Plan Amendment Proposal for Hog Island

Dear Town & County Planning Commissioners,

Thank you for considering our comments regarding the proposed Comprehensive Plan amendment.

First, we commend the applicant and their team for bringing forward a proposal to meet a community need, and for engaging our community prior to required public hearings. We hope the input they heard will result in positive changes to their development proposals.

Second, we commend the Town & County Planning Directors for their deep and thoughtful treatment of the immediate and long-term consequences of these decisions. This staff report is exceptional in its clear background and context, its level of analysis, and its direct recommendations. In general, we support the analysis and recommendations. Please allow us to share our approach as well.

First: we do not support amending the Comprehensive Plan without extraordinarily good reasons. The Comp Plan was carefully crafted and based in years of community engagement. It presents a strong vision for protecting what we love about Jackson Hole: our ecosystem, our community, and our quality of life. The Comp Plan has a strong growth management framework and is our best bulwark against sprawl. We should only change it as part of a holistic county-wide smart growth strategy, and only when we know the changes will result in real benefit to the shared values outlined in the Plan.

Please start by establishing clarity on the rationale for this proposed amendment. We have heard two very different lines of reasoning: either (1) Hog Island is generally the right place for a lot of new housing; or (2) this amendment would enable a specific opportunity.

- (1) If Hog Island is the right and **strategic** place for more density, in general, than we don't need to talk about what projects might look like. However, the Planning Directors make a strong recommendation that Hog Island is not, in the abstract, the right place for more density. Also, this determination should come from the Growth Management Program update that you and our elected representatives are embarking on soon – you'll take a strategic and holistic look at how and where we should grow. *Please wait until that strategic update is complete before considering specific amendments.*
- (2) Even without believing that Hog Island is the strategic place for more density, one could make the case that this developer's interest (and recent actions of WYDOT, TCSD, etc) create a rare **opportunity** that we should not waste. In this case, we absolutely need to know, and agree on, what the developer intends to build. *We cannot support a Comp Plan amendment to enable a specific project unless we wholeheartedly support the project.*

While we would not support building a new suburban “bedroom community” in a rural area, as might be proposed in Hog Island, we could potentially support a proposal that sets a model for responsible planning and good community design.

Principles for this model include:

- Creating a true “*village*” among the network of villages around our community – in the context of a coherent valley-wide growth strategy
- Designing a *walkable neighborhood* with enough density to support a real “village center” with neighborhood services (like a market, transit center, neighborhood school, gym, community center, library, etc) so that residents don’t need to drive for their daily routines, and so it functions as a real community
- Fully identifying and protecting – and even enhancing – the most important on-site *wildlife habitat and wildlife movement permeability*
- Bringing in a significant amount of development rights from higher-value parcels (as identified by the new natural resource tier map) to offset the upzone – creating *real conservation value* (through existing incentive tools or a true transfer of development rights program)
- Including *ownership deed-restrictions* (not merely occupancy) so we can rest assured that this neighborhood will permanently allow *locals* to invest in our community for the long term (instead of just being affordable during the first sale, and then becoming high-cost rental stock owned by outside real estate investors).

We encourage potential developers to propose plans consistent with these principles, and we would welcome an in-depth discussion of truly responsible and forward-thinking planning.

Finally, if we amend the Comprehensive Plan to add new density in one location, we should simultaneously amend it to **remove density in another location to maintain parity** with the current Plan “buildout cap”.

Thank you for your consideration, and please use us as a resource as you engage in these important discussions regarding the future of our valley.

Sincerely,



Skye Schell
Executive Director
Jackson Hole Conservation Alliance