

Teton County Board of Commissioners
200 S. Willow Street
Jackson, WY 83001

February 24, 2023

Dear Commissioners:

The Northern South Park development could be the largest ever residential development in Teton County, with the potential to construct as many as 1,800 new residential units. We understand why so much of the focus and debate have been around issues of affordable and workforce housing. But as the Jackson Hole Climate Action Collective, an all-volunteer non-profit organization working towards a just and equitable climate future for Teton County and beyond, our primary concern is with climate impacts, which have received little attention with regard to this project to date.

The Comprehensive Plan prominently states a goal for our community at the beginning of Chapter 2 (Climate Sustainability): **“Emit less greenhouse gases than we did in 2012.”** Our fundamental request to this Board is to ensure these draft land development regulations advance—rather than detract from--achievement of this goal.

The Northern South Park Neighborhood Plan certainly advances important strategies for reducing climate and other impacts. The most important of these is that it increases density of development and situates it adjacent to Town of Jackson and its services with connections for active transportation (walking, biking) and transit to reduce motor vehicle trips, which comprise by far the largest amount of greenhouse gas emissions in Teton County (some 60%). But these strategies alone are not sufficient to reduce emissions below 2012 levels. Rather, they will undoubtedly further increase them. In 2022, county-wide greenhouse gas emissions were already more than 20% higher than in 2012. Furthermore, our land development regulations inadequately address matters of climate risk reduction and adaptation as temperatures in our region continue to increase.

We propose an amendment to the LDRs (see below) to require developers to analyze and address climate impacts and resilience. This is consistent with other requirements of developers related to traffic impacts, stormwater, etc.

In the end, reducing greenhouse gas emissions and addressing climate risks is not about achieving a number specified by a group of scientists and/or policymakers. It is about protecting our health, our quality of life, our ecosystem, and our economy. **The negative impacts of development undertaken without due consideration of climate impacts will be felt for decades.** You have an opportunity to make a real, positive difference here for our community and we urge you to take it.

Margie Lynch, Chairperson
Jackson Hole Climate Action Collective
www.jhclimateactioncollective.org

cc:

Ryan Hostetter
Chris Neubecker
Erik Kimball

I. Proposed LDR amendment:

4.5.1.C.3.a. Development Plan. Contents.

New subsection iv.

A development plan application for 25 or more residential units shall provide analysis of near and long-term project impacts on the surrounding environment and Teton County's greenhouse gas emissions and of the impacts of the environment on the development's buildings, infrastructure and landscaping including consideration of future climate risks and conditions. This analysis shall consider how changes in climate and environmental conditions will affect the proposed project's environmental impacts, including greenhouse gas emissions, the survivability, integrity, and safety of the proposed project and of its inhabitants, and ways by which to avoid, eliminate, or mitigate any adverse impacts including how the project will contribute to the Comprehensive Plan goal of emitting fewer greenhouse gases than in 2012.

For any impacts related to climate change that are identified, project proponents shall describe all immediate and long-term planning, design, construction, and maintenance strategies that will be employed to enhance resilience and to avoid, eliminate, or mitigate greenhouse gas emissions and any adverse impacts from climate change.

Current and future climate conditions over the design life of the development (minimum 50yrs) to be considered include, but are not limited to, higher and lower annual temperatures, more frequent and longer extreme heat and cold events, drought, wildfire smoke and associated air pollution, increased precipitation, more severe storm events and flooding, and increased greenhouse gas concentrations.