



# Valley Advocates for Responsible Development

February 19, 2021

Victor City Council  
10 S. Main St.  
Victor, ID 83455

## **Re: Draft Comprehensive Plan**

Dear Members of the Council:

We find that many of the goals, objectives, and policies of the draft Comprehensive Plan will further our mission of promoting open spaces, wild places, and vibrant towns in Teton Valley. We like the Dark Skies provisions and know of other communities that have made exemplary efforts in limiting excess outdoor lighting. We support the viewshed analysis that will be incorporated into the design of public spaces. The Trail Creek Greenway concept is exciting and we hope that it enjoys the success experienced by the Teton Creek Corridor Project in Driggs.

We have reviewed public comments submitted for the draft plan, and we are a bit confused about how the Comp Plan process resulted in a Future Land Use Map (FLUM) that seeks to increase the footprint of the city by about 40% when the city projects a growth rate of 8%. We appreciate the reduction in footprint recommended by the Planning & Zoning Commission, but fear that it still fails to link the plan's policies with the FLUM.

We understand most of these areas are within existing city boundaries, but the fact that so much land within the city core remains undeveloped raises the question of why the city should be actively seeking development at the city's edges. In other words, why isn't the city considering shrinking city boundaries in order to support its core? We note that the City of Driggs pursued a similar strategy in that city's newly adopted Comprehensive Plan. The Town of Jackson hasn't significantly adjusted its boundaries in 30 years, but has experienced voluminous infill, including thousands of new residential units. Jackson Hole has its issues, but a lack of vibrancy isn't one of them.

As far as we can tell, the draft FLUM seeks rapid development of these areas (proposed zone changes are designated as a 1-5 year "short-term" implementation priority) for the following reasons:

- "While there is room to grow and respond to the increasing demand for housing in the area, **many lots remain vacant due to continuously rising construction costs or land speculation.** This exacerbates the housing supply issue." (pp 10)

- “One of the key factors within this Comprehensive Plan is the addition of a growth management area and boundary, **identifying those areas in which it makes sense for the city to grow, in regards to utilities, habitat, resource areas, connections, etc.**” (pp 25)
- “Create a **soft edge** of residential neighborhoods, integrated with agriculture, open space, and recreation opportunities.” (pp 26)
- “**Encourage land use patterns that promote economic and social prosperity**, as well as efficiency in infrastructure and services.” (pp 26)

In our review of public comment, we note that preventing sprawl is a recurring theme. Urban Planning is a social science, and, in the context of a Comprehensive Plan, community values must be front and center in decision-making. If the public doesn't want sprawl, that is reason enough to stop sprawl.

The proposed FLUM is a plan for sprawl. The draft plan anticipates a 8% population increase in the next 5 years, while the footprint of the city is proposed to increase by about 40%. We don't find above-mentioned justifications for sprawl in the plan compelling. Specifically:

- **Speculation and Construction Costs.** The lure of cheap land at a city's edge is primarily why North American cities have sprawled in the post-war era and experience the deleterious effects of sprawl today. Cities that have successfully combated sprawl have drawn a hard line in the sand, which then channels development activity toward infill development. Ultimately, developers overcome the speculation and construction obstacles that lie in the way of successful infill development. Consider the Town of Jackson (TOJ), which has held tight boundaries since the early 90's. In the last eight years, TOJ has seen over 600 residential units developed or in the pipeline - nearly 200 of which are deed-restricted affordable - with no increase in physical footprint. TOJ and Teton County, Wyoming are now formulating a neighborhood plan for the Gill and Lockhart lands to the south of High School Road, which will include a no-build option for consideration. This is pursuant to the Northern South Park “trigger” in the Jackson-Teton County Comprehensive Plan, which requires the community to achieve an acceptable threshold of infill development before new lands are considered for city-level development. The plan will otherwise consider the amount of workforce housing needed and the neighborhood plan's availability to meet such needs. We find that the FLUM should benefit from this level of rigor before lands at the city's edge are considered for development.
- **Availability of Utilities.** Similar to the point above, the availability of utilities is typically the precursor to sprawl. The presence of existing or future utilities shouldn't override the will of the public. Moreover, developers that emerged during the boom-bust era of the late 2000's laid infrastructure for sprawling development that the City of Victor wisely de-annexed in order to support a core-first strategy. We recommend that the city not only continue - but bolster - this strategy of not sprawling toward utilities born from by bad decisions of the past.

- **Soft Edge vs. Hard Edge.** The desire for a “soft edge” is something that we have not found to be widely supported in public comment. In Driggs, the public clearly stated their preference for a hard edge in order to protect the surrounding countryside and to promote a vibrant core. We believe Victor residents want the same and that a hard edge strategy will work for Victor.
- **Economic and Social Prosperity.** Decades of research have indicated that that sprawl is counter to economic prosperity. [Strong Towns](#) has been particularly active in this arena, and has chronicled the economic success of communities that have resisted sprawl. Social prosperity, as we understand the term, is synonymous with livability. Sprawl has shown to have adverse effects on livability.

We ask that the City Council also consider the fact that Victor and Teton Valley lie within the Greater Yellowstone Ecosystem (GYE), the planet’s only intact ecosystem in a temperate climate zone. VARD believes we have a special duty to protect the GYE, and that our human footprint should be limited as much as possible. Teton County has been making great strides in overhauling their Land Use Code, and the county will likely embrace low-density, clustered zoning with enhanced wildlife protections. This will go beyond the county’s current rural-density zoning ordinance and Wildlife Habitat Overlay.

The draft Comprehensive Plan seeks to promote a “compact and livable city.” This is best achieved by drawing a hard line around the city’s footprint and welcoming the 36 new residents the city receives each year and inviting them to be part of the solution. The potential for infill only exists if the city holds the line on sprawl, as does successful stewardship of the GYE.

Finally, you received the alternative FLUM prepared by VARD on February 9th. We hope that you seriously consider it as a framework for formulating the adopted FLUM.

Respectfully submitted,



Shawn W. Hill  
Executive Director