

October 11, 2018

Teton County Planning Commission

**Re: AMD2018-0002, AMD2018-0003**

Dear Planning Commissioners,

Thank you for the opportunity to comment on the Land Development Regulation (LDR) text amendments before you that would extend operating hours and increase building size within Rural zones. We do not support these global text amendments. We believe they have the potential to negatively change the character of our rural areas as defined by the Comprehensive Plan by allowing for increased development and use.

The stated purpose of a text amendment is to “improve implementation of the Jackson/Teton County Comprehensive Plan.” These text amendments do not improve implementation of the plan, but rather clearly go against the vision set out for rural areas. As defined in the Comprehensive Plan, a rural area is a quiet area for agricultural uses, wildlife corridors and residents. Extending operating hours and expanding building size would change this characteristic with future non-conforming development.

Upon reviewing the Staff Reports, we agree with the findings of the planning staff and director that these text amendments do not improve implementation of the Comprehensive Plan, diminish the level of predictability and character within the R-1 and R-2 zones, and should be denied. We also support the detailed July 18 comments submitted by Andrew Salter for Friends of South Park.

It is important to consider these text amendments on their merits, and as they apply to all parcels in the Rural zones – not based on support or opposition to an impending application for a private school. We support staff’s cogent analysis that these amendments are not necessary for a school:

Functionally, there is not an insurmountable need that supports increased bulk and scale in the preservation subareas. There are admitted compromises in the breaking out of individual buildings within a campus; however, this does not functionally prohibit the development of a school, or other institutional use.

We have one key point that we did not see in other comments: the building size text amendment is poorly written and overly vague. The amendment would put the following language in our LDRs:

The following are individual buildings that are inherently large due to their use and may exceed 10,000 square feet but are not to exceed 30,000 square feet:

Barns

Gymnasiums  
Church assembly halls  
Performance halls  
Assisted living facilities  
Other similar uses that require large amounts of consolidated square footage

While the amendment purports to limit increased building size to specific “individual buildings,” the final line is essentially a blank check for *any* buildings that a future developer might want to build beyond 10,000 square feet – essentially, a 30,000 foot wide loophole in the LDRs. Please reject this vague and poorly-written language.

**Please recommend denial on both AMD2018-0002 and AMD2018-0003.**

Thank you for your consideration of our comments and please do not hesitate to contact me with any further questions.

Sincerely,



Leah Zamesnik  
Conservation Policy Manager  
Jackson Hole Conservation Alliance