

December 9, 2015

Dear Board of County Commissioners,

Thank you for the thoughtful and methodical process you have undertaken to ensure we get the Rural Land Development Regulations right. We greatly appreciated the extra time you allowed for key stakeholders to provide meaningful input and believe that this input, combined with your attentive improvements to the previous draft, have resulted in a much better, almost final product.

The Jackson Hole Conservation Alliance believes we have a responsibility to write land use rules that align with our community's vision as articulated in the 2012 Jackson / Teton County Comprehensive Plan. This is a vision of a community with walkable neighborhoods surrounded by protected open space, working agricultural lands, and connected wildlife habitat. A community where at least two-thirds of our diverse workforce can affordably rent or purchase a safe and healthy home that meets their family's needs. A community where everyone has the freedom to safely and conveniently get where they need to go on foot, bike, or transit.

The Board of County Commissioners Proposed Draft dated November 20, 2015 of the Teton County Rural Area Land Development Regulations (Rural LDRs) takes important steps toward advancing this vision, and **with three important improvements, the Alliance would support adoption.**

First, **please incorporate the final set of revisions articulated in the Conservation Easement Enhancement Redline**, submitted on behalf of an “informal working group” of conservation non-profits, planning consultants, property owners with extensive experience implementing conservation easements, and land development regulation experts, in which we participated. These revisions are critical to ensuring the Rural LDRs encourage the permanent protection of open space. Building on previous recommendations, these revisions have a singular focus: to encourage our valley's landowning families to permanently protect open space. They are simple improvements that will make our LDRs more conservation easement friendly and encourage, rather than discourage, the personal decisions of families in our valley to enter into conservation easements on their lands. In addition, **please incorporate the technical changes recommended by the Jackson Hole Land Trust regarding Section 7.3.**

Second, **please do not make any changes to the process by which we zone public lands when they come into private ownership.** Currently, public lands transferring into private ownership receive an R1 designation, which essentially serves as a holding zone until the County can undertake a robust public process to determine the appropriate zone for the property. The proposed change to Section A. 1.7.6 – Change of Jurisdiction – would eliminate this critical step and take the public out of this

Protecting the wildlife, wild places, and community character of Jackson Hole.

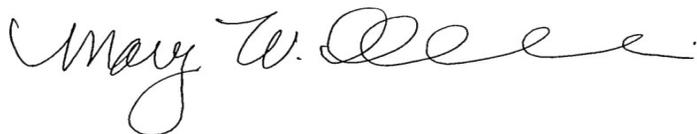
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important zoning process. There is no community benefit, policy justification, or Comprehensive Plan direction for this proposed change. Any zoning of public lands being transferred into private ownership should initially be zoned R1, and then there should be a robust public process to determine the new zoning.

Third, **please do not change the zoning process for Planned Resort Master Plans that expire or are revoked or abandoned.** Currently, when a Planned Resort Master Plan (PRMP) permit expires or is revoked or abandoned, the land use designation reverts to the zoning that existed prior to the adoption of the master plan. Analogous to the current process for zoning public lands being transferred into private ownership, the existing process for expiring PRMPs allows for a robust public process before the land is re-zoned. Similar to the proposed change for how we transfer public lands into private ownership, the proposed change to Division 4.3 would take the public out of this important re-zoning process. Just like the proposed change for how we transfer public lands into private ownership, there is no community benefit, policy justification, or Comprehensive Plan direction for this proposed change. Before any re-zone of an expired, revoked, or abandoned PRMP, the zoning should revert to what it was prior to the PRMP, and there should be a robust public process to determine what the new zoning should be in the future.

Thank you again for the thoughtful and methodical process you have undertaken to ensure we get the Rural LDRs right. We look forward to supporting adoption of the final Rural LDRs once you've made these three important improvements.

Sincerely



Mary W. Gibson
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Jackson Hole Conservation Alliance

Cc: Alex Norton, Long Range Planner
Tyler Sinclair, Planning Director