

September 16, 2015

Dear Board of County Commissioners,

Thank you for the delay in adoption of the draft Rural Land Development Regulations (LDRs) allowing the Alliance, along with our community's planning professionals, property owners, and conservation professionals, the opportunity to offer recommendations for improving the draft Rural LDRs. During the extra time you gave us, a group of us worked collaboratively and reached consensus on desirable revisions to improve the final product.

When conservation non profits, planning consultants, large property owners with extensive experience implementing easements, and LDR experts all come together and agree on how to improve our rural LDRs in regards to encouraging conservation easements, it is quite an extraordinary occurrence, and we would encourage you to keep this in mind as you review our joint recommendations.

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.

We support two sets of recommended revisions, which were developed with a singular focus – to encourage our valley's land owning families to permanently protect open space. We endorse the “Conservation Easement Enhancement Redline” revisions submitted by Bill Resor, on behalf of the informal stakeholder working group mentioned above, and **we support the redline revisions submitted by the Jackson Hole Land Trust.**

We recommend you incorporate the whole of both packages of revisions into the Rural LDRs. They are necessary to ensure the Rural LDRs encourage the permanent protection of 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. And they work together, as a whole package.

Permanent protection of open space is among the top policy objectives of our Comprehensive Plan, and these proposed revisions would help our community achieve that goal.

These revisions value all open space, regardless of whether or not it is primarily habitat or active ranch land, whether it is in a large tract, or smaller parcel. **Every undeveloped parcel in the Rural Zone is a candidate for permanent protection through conservation easements.**

To be consistent with this approach, **we should not throw out the natural resource protections on small sites as currently proposed**, as the relationship between quality of resource has less to do with site size and more to do with site location, and any resource values present or nearby. The gap between Rural LDR adoption and Natural Resource Overlay and the Environment Assessment LDR updates and adoption could stretch into the years, rather than months. Protection should be continuous and not lapse for a period of time. **Lapsed protection is an invitation to plunder resources to pave the way for future development while there are no rules in place.** Once a property owner eliminates the resource during the proposed protection gap, then there is nothing left to protect when protections are put back into place.

In summary, the changes suggested in the “Conservation Easement Enhancement Redline” and the Jackson Hole Land Trust redline would improve the Rural LDRs such that owners of eligible acreage may be attracted to protect land to benefit the community and the ecosystem in accordance with our Comprehensive Plan. **These improvements do not change the size of the bonuses the Board has agreed to**, they simply make the process more flexible, site-specific, and attractive to landowners by providing more certainty.

Please consider these important improvements as a package and add them in total to the final version of the Rural LDRs. By doing so, you will add to the County’s legacy the measurable success in more acreage conserved by more property owners for the benefit of the environment, our wildlife, and our community.

Sincerely,



Mary W. Gibson
Community Planning Director
Jackson Hole Conservation Alliance

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