

March 18, 2016

Dear Jackson Town Council and Teton County Board of Commissioners,

Thank you for the opportunity to comment on the FY16-17 Comprehensive Plan Implementation Work Plan.

First, we commend you and your staff for the progress you have made over the past year in implementing the Comprehensive Plan. The adoption of the Integrated Transportation Plan, the Housing Action Plan, and updated Rural land development regulations are significant accomplishments.

Second, we strongly agree with planning staff that it is crucial for the public, recommending bodies, and elected representatives to all participate in a continuous process on a predetermined schedule. We also agree with planning staff that it's important to focus and prioritize, as staff, the public, and your respective elected bodies cannot effectively engage in more than 3 projects at one time.

Third, we ask that you focus the FY16-17 Comprehensive Plan Implementation Work Plan on items that will most effectively achieve the Comprehensive Plan's vision to, "Preserve and protect the area's ecosystem in order to ensure a healthy environment, community and economy for current and future generations."

With continuity, focus, and a prioritization of items that advance the vision of the Comprehensive Plan in mind, we **respectfully request that the FY16-17 Comprehensive Plan Implementation Work Plan includes updates to both the Joint Natural Resource LDRs and the County Wildlife Friendly Fencing LDRs.** In addition, we respectfully request the work plan includes **time for planning staff to lead a stakeholder taskforce that would make recommendations about the scope of a potential program to protect open spaces and improve habitat connectivity in Teton County.**

Joint Natural Resource LDRs and the County Wildlife Friendly Fencing LDRs

In support of your work to implement the 2012 Jackson/Teton County Comprehensive Plan, with a focus on Section 1: Stewardship of wildlife, natural resources, and scenery, the Jackson Hole Conservation Alliance recently presented you with both extensive best practices and recommended improvements to the Natural Resource Protection Regulations, for Teton County and the Town of Jackson, WY, and detailed recommended improvements to fence regulations to improve wildlife safety for your consideration. Specifically, we presented you with:

- *Best Practices and Recommended Improvements to the Natural Resource Protection Regulations For Teton County and the Town of Jackson, Wyoming - A*

detailed and extensive research paper developed through numerous stakeholder interviews, a literature review, and model code research.

- *Summary Recommended Improvements to the Natural Resource Protection Regulations* - A brief, 3-page summary of the research paper including a recommended process for updating the Natural Resource Protection Regulations.
- *Recommended Wildlife Safer Fence Standards* - Detailed, specific, and field informed model code fence standards to reduce wildlife mortality.
- *Safer for Wildlife Fence Standards Cover Memo* - A brief memo explaining the problem of wildlife fence mortality, the process of developing the model code fence standards, and the policy basis and justification for the proposed code language. (Important note: these recommendations do not call for a change to the exemptions that agriculture enjoys from the existing fence standards, nor do they recommend those exemptions be modified to incorporate Wildlife Safer Fencing Standards. The only changes recommended have to do with non-agriculture fencing.)

All of these items are attached to this letter again for your convenience.

Adopted over two decades ago, our community's Natural Resource regulations are significantly out of date (none of us use Windows 95 anymore) and need to be updated and aligned with the vision of the 2012 Comprehensive Plan. In addition, the Comprehensive Plan Implementation Work Plan has included updating our Natural Resource Regulations as a priority for the past five years – now we should maintain this continuity and move forward on updating this priority.

It's also important to note that the process of updating our Natural Resource regulations can begin before the finalization of the County's project to map relative critical habitat value (the Focal Habitat Feature project). Existing data, maps, and reports provide a reasonable view of what final habitat maps may look like. These data can guide the beginnings of a Natural Resource Regulation update. As the update progresses, the Focal Habitat Feature project will be completed and at that time can be merged with the regulation rewrite.

Open Space and Habitat Connectivity Taskforce

We also respectfully request that you direct planning staff to lead a stakeholder taskforce that would make recommendations about the scope of a potential program to protect open spaces and improve habitat connectivity in Teton County.

Please see our attached letter, *Alliance Open Space and Habitat Work Plan Request 20160210*, for additional details regarding this request.

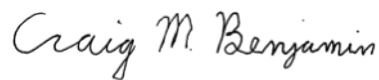
Additional Items

In addition to prioritizing updates to both the Joint Natural Resource LDRs and the

County Wildlife Friendly Fencing LDRs, and directing planning staff to lead a stakeholder taskforce that would make recommendations about the scope of a potential program to protect open spaces and improve habitat connectivity in Teton County, we also respectfully request that you proceed in FY16-17 as planned with the completion of Town District 2 zoning, and updates to the Joint Housing Mitigation LDRs and the Joint Wildland Urban Interface LDRs. Continuing as planned with these items would ensure continuity and align with the priorities of the Comprehensive Plan.

Finally, given the need to focus, maintain continuity, and prioritize items that advance the vision of the Comprehensive Plan, we respectfully request that you do not add items onto the work plan that would not align with these principles. Specifically, an update to newly proposed items, like Joint Industrial Zoning, should occur in the future, after priority items on which our community has been working for years have been completed.

Thank you again for the opportunity to comment on the FY16-17 Comprehensive Plan Implementation Work Plan, and for your hard work to advance the vision and values of our community.



Craig M. Benjamin
Executive Director
Jackson Hole Conservation Alliance