

March 1, 2019

Jackson Mayor and Town Council
Teton County Board of County Commissioners

Dear Mayor, Councilors, and Commissioners,

Thank you for the opportunity to provide comment as you review the FY20 Comprehensive Plan implementation workplan. We have three requests for your Joint Retreat discussion:

1. Please prioritize finishing the county natural resource protection updates, and please prioritize Town natural resource protections in 2020
2. Please bring back two staff positions: a natural resources/biology expert and a Teton County Scenic Preserve Trust coordinator
3. Please include time and money to for the county-wide cumulative impact study

1. Please prioritize natural resource protection LDRs

First, thank you for prioritizing the County natural resource LDRs update in recent years. We are glad to be a part of the natural resources stakeholder group (NRSG) and we appreciate your former planning staff's hard work. The stakeholder group has worked hard over two years to develop a new framework. Recognizing that the Planning Department likely won't have capacity in-house, please hire a consultant to both facilitate a few more NRSG meetings (confirm the map/regulations framework, then cover ground we have not yet gotten to: fencing, migrations, incentives, etc) and then draft the new code. The \$5,000 FY20 budget in the workplan seems inadequate for this scope of work. We would welcome the opportunity to help craft that scope, with our colleagues on the NRSG.

→ *Please include a substantive budget for consultants to help the NSRG get a new draft over the finish line in FY19-20.*

Improving the *Town* natural resource protections is also critical. Just two salient examples: bears get into unsecured garbage cans in Town and are killed, and polluted snow piles are pushed or melt into Flat Creek, degrading water quality. It doesn't have to be this way. We should prioritize updating the Town natural resource protections in quick succession to adopting the County LDRs. We are disappointed to see the Town natural resource LDRs scheduled for mid-2020. If we wait another year and a half to start this work, we could lose the momentum the natural resource stakeholder group has built up over the past years, and more bears could needlessly die.

→ *Please move this important effort up the priority list so that it begins as soon as County natural resource protections are updated and adopted.*

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

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2. Please hire additional natural resources staff

Many of NRSO colleagues have broad interest in the county hiring additional staff to implement the core of our Comprehensive Plan: “preserve and protect our area’s ecosystem.” We are grateful for the work that your staff already do on behalf of the ecosystem, and we know some planners have backgrounds in natural resource management / biology. However, there is no **position focused on natural resources** or conservation.

Additionally, there is no **staffing for the Teton County Scenic Preserve Trust** (TCSPT), which is an important public complement to the excellent private work of the Jackson Hole Land Trust. The 2018 and 2019 Indicator Reports identify TCSPT accepting new easements as a key “next step.” A new staff member would increase the County’s capacity to effectively administer and encourage new easements in locations of high wildlife habitat and scenic value.

The County had both of these positions until the Great Recession. We have been out of the recession for many years now, and our development market is very hot.

→ *Please bring back these positions and their capacity to protect our wildlife, their habitat, and the health of our ecosystem.*

3. Please initiate the cumulative impact study

The Comprehensive Plan outlines a strategy referred to as a “cumulative impact study” as defined in Policy 1.1.e and Strategy 1.1.S.3:

Policy 1.1.E: Understand the impacts of development on wildlife and natural resources - It is a goal of the community to better understand the impacts of development on wildlife. In complex situations, such as understanding impacts of individual developments on an entire ecosystem, science cannot provide precise answers in the timeframe of an individual project because baseline study and years of data are needed. **Through the Natural Resource Technical Advisory Board, the Town and County will gather the baseline information needed to create and implement a system to monitor the impacts of growth and development on wildlife, wildlife habitat, and wildlife mobility over time.** As we gain a greater understanding of our impact on wildlife, our protection measures should be updated to ensure we are maintaining healthy populations of all native species.

To quote the 2018 Indicator Report “Last year, this Report identified a need to conduct more research on the health of the Greater Yellowstone Ecosystem. This remains the case this year. A cumulative impacts study will help us better understand the impacts of

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development and population growth on our ecosystem, help us develop better indicators of ecosystem health, and indicate which natural resource protections have the most impact." The 2019 Indicator Report agrees: "Our community continues to ask for further research into the status of our ecosystem health. Suggestions for research include a cumulative impacts study and a carry[ing] capacity study, both looking at how humans in our area impact the health of the Greater Yellowstone Ecosystem."

For years, this study has stayed on the back burner, perhaps due to a lack of understanding of what it would actually entail. Therefore, **we recently worked with conservation partners to outline a methodology.** As a preliminary outline: first, update the county's Vegetation Map in 2019-2020. Then, measure change in the map over time – perhaps every six years – looking at land cover, impermeable surface, biodiversity, etc. Additionally, measure wildlife permeability through a method such as CircuitScape for multiple key species.

→ Please add the "Cumulative Impact Study" to the FY20-21 workplan under "LDR Updates and Studies." Please coordinate with the Teton Conservation District, as they could be an excellent project leader.

As is evident throughout the Comprehensive Plan, our community benefits from and deeply values our wildlife and open space. We believe prioritizing and funding County & Town natural resource LDRs, hiring additional natural resources staff, and creating a cumulative impact study will lead to even better protection of our area's ecosystem.

Please be in touch with any questions and consider us ready to help.



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