

*Below are comments Kristy Bruner, Alliance community planning director, verbally presented at the **May 17, 2011**, Teton Board of County Commissioners hearing regarding a request for a conditional use permit to allow 71 recreational park trailers (RPTs) at the Jackson Hole Campground on the Moose-Wilson Road.*

Thank you for the opportunity to comment. We recognize the complexity of the issues associated with this proposal and appreciate the work that has gone into reviewing the project.

Our primary concerns with the project, some of which you already voiced today, include:

1) The Land Development Regulation language on campgrounds is specific about providing sites to accommodate uses (as opposed to providing accommodations). Providing sites versus providing accommodations is an important difference. With this in mind, it would be helpful to get additional clarification, beyond what has been discussed today, as to why this was considered a change of operational characteristics and not a change in use. (This is important in terms of making sure the impacts that arise from developments are adequately mitigated.)

2) The use of LSR to measure development intensity of the project: This method of measurement seems to underestimate the full considerations of land use impacts that would be associated with the units that would essentially function as permanent structures on the ground year round. We're concerned that this very different interpretation for measuring development intensity could set a precedent for future projects.

The Zoning Compliance Verification under consideration directly addresses this measurement standard in the first question. This is very relevant for the conditional use permit application review. It's important to note that the ZCV does not just address issues of expansion.

3) The need to recognize seasonality as a key issue in your review and upholding the Natural Resources Overlay standards: Given the shift to a more intense year-round use, it doesn't appear that the review has adequately considered the potential impacts to wildlife. The waiving of the Environmental Assessment requirement is particularly critical given the scale of proposed use of the recreational park trailers on the site. Increasing intensity of use during the winter would likely have impacts on the quality of moose crucial range in the area, which our LDRs intend to protect. These impacts should be reviewed, and if applicable, mitigated in a meaningful way beyond simply shifting units and snow storage out of the NRO. This includes consideration of an appropriate number of RPT units.

To put this into perspective, it's highly unlikely that it would be deemed appropriate to waive an EA requirement, or refer to an EA that is four years old, in the case that a 71-unit lodging project inside the NRO came before the county (which this project closely resembles if units were open for winter use).

4) If RPTs are permitted on site, it seems more appropriate to restrict use to the BC zone only (and not the rural zone).

With those concerns in mind, we do not support the project as it is currently proposed, including the conditions as listed. Approving a project of this scale in which the land use impacts associated with it are not adequately considered is not a good route to take in terms of upholding the intent of the comp plan and LDRs.

Thank you.