



Jackson Hole Conservation Alliance  
(307) 733-9417 • [www.jhalliance.org](http://www.jhalliance.org)

October 27, 2011

To: Jennifer Anderson, Teton County Planning Department

RE: Proposed RPT regulation

Submitted via email

Dear Jennifer,

Thank you for the opportunity to comment on the proposed changes to Sections 2220.B.5.b, 23400, 2220.A.3.d, and 2220.D.5 with regard to Recreational Park Trailers (RPTs) in Teton County.

Generally speaking, we appreciate the effort to regulate RPTs as they were previously not covered in the Teton County Land Development Regulations. We are pleased to see this particular land use regulated into the future.

We do have a few questions and suggestions pertaining to the draft regulation released in October. First, if a property is within the Natural Resource Overlay or Scenic Resource Overlay, special restrictions on use, particularly in the winter, should be applied, such as a requirement for an Environmental Assessment. This should be spelled out in the regulation language.

Second, we have long been concerned about the seasonality of RPT use and the increase in the impact that keeping the units available for use year-round has. Instead of simply leaving the seasonality to the discretion of the Planning Director, we would appreciate some stricter standards to grant year-round use to ensure that wildlife are not being unduly impacted. Wildlife are particularly sensitive in the winter months and inhabited structures represent an entirely different set of obstacles for wildlife than empty campgrounds do. The impacts of RPT development and of year-round use should be reviewed and mitigated in a meaningful way. This includes consideration of an appropriate number of RPT units.

Third, we are supportive of the provision that stipulates that all RPTs should be under single ownership within a campground development.

Fourth, RPTs should also be subject to local building and fire codes, which could be spelled out more clearly in the regulations, as well as employee housing and other mitigations and exactions.

Lastly, we remain concerned that an RPT is essentially a permanent structure in areas where formerly only temporary structures (aside from the support facilities in campgrounds) were allowed. This represents a fundamental change of use of the properties and necessarily increases the impacts on wildlife. It would therefore be beneficial in the long run to engage in a more formal consideration of zones that are appropriate for this type of use - short term lodging - rather than allowing them on all campgrounds. As development that occurs sets precedent for future development, it is important to be conscientious about where and under what conditions

the County allows the development of permanent structures where permanent structures have not been allowed before.

Thank you for your consideration of these comments and for your work on this new regulation. We look forward to discussing this issue in more detail with the planning commission and the Board of County Commissioners.

Sincerely,

A handwritten signature in black ink, appearing to read 'RT', is positioned above the typed name.

Rebecca Tillson  
Wildlands and Community  
Planning Associate