



September 8th, 2025

Board of County Commissioners
Teton County, Wyoming
200 S. Willow Street
Jackson, WY 83001

RE: Comment on AMD2025-0001 – Workforce Home Business Zone Amendment

Dear Teton County Board of County Commissioners,

Protect Our Water Jackson Hole (POWJH) and the Snake River Fund (SRF) respectfully submit this comment regarding AMD2025-0001, which seeks to allow primary light and heavy industrial contractor uses within the Workforce Home Business (WHB) Zone in Hog Island. This written comment follows a verbal public comment made to the County Planning Commission on August 11, 2025 on behalf of POWJH.

We appreciate the Planning Department staff's careful review of this proposal and strongly support the Planning Commission's recommendation to deny the amendment. The record clearly shows that introducing industrial uses to this area would conflict with both the Comprehensive Plan and the 2024 Water Quality Management Plan (WQMP).

As emphasized by Teton County Public Works Project Manager Chris Colligan in his departmental review, the Hog Island area contains some of the most pristine groundwater sources in southern Teton County. The area is included in the WQMP's proposed groundwater protection overlays. As staff noted, the WQMP recommends "avoiding industrial uses in areas with high vulnerability to anthropogenic pollution." Allowing primary light and heavy industrial uses here would be directly contrary to that guidance.

Industrial contractor operations such as excavation, paving, hauling, and heavy equipment storage present significant risks of groundwater contamination through fuel spills, oil and chemical leaks, sediment runoff, and stormwater discharge. Importantly, the greatest threats often come from small, chronic leaks and runoff that accumulate over time, impacts that are nearly impossible to reverse once allowed, and that can persist for generations.

Subarea 7.2 (Hog Island Home Business) was explicitly identified as a stable, primarily residential area with opportunities for small-scale subordinate home businesses-not industrial expansion. Allowing primary industrial uses, even narrowly tailored, fundamentally reverses the intended character of the WHB zone.

Hog Island is adjacent to lands that directly abut the Bridger-Teton National Forest and the Snake River corridor. Multiple subject parcels offer unimpeded views of the Snake River Range and provide a critical scenic buffer along South Highway 89—an approach used daily by residents, visitors, and outdoor recreationists heading to the river, trailheads, and campsites.

Additionally, the proposed amendment includes large parcels within ½ mile of the South Highway 89 wildlife crossing and opens the door to development that could introduce impermeable barriers to wildlife movement.

The area's proximity to the Snake River—one of our region's most popular recreational rivers—makes it particularly sensitive to cumulative environmental impacts. Industrial runoff and degraded scenic quality diminish the river experience and contradict the Plan's ecosystem stewardship goals under Principle 1.3.

This amendment appears tailored to benefit a single property owner seeking to legalize a non-conforming use post-purchase. Staff have correctly noted that such ad hoc amendments erode the predictability and consistency required by Section 1.3.4 of the Land Development Regulations and jeopardize the integrity of long-term planning frameworks designed to balance economic needs with environmental protection

For these reasons, POWJH and SRF urge the Board of County Commissioners to uphold the Planning Commission's recommendation and deny AMD2025-0001. Protecting the groundwater resources of Hog Island safeguards both community health and the long-term environmental integrity of southern Teton County.

Thank you for your attention to this critical matter.

Sincerely,



Jennifer Evans
Advocacy Director
Protect Our Water Jackson Hole



Orion Hatch
Executive Director
Snake River Fund