

May 6, 2026

Town of Jackson Planning Commission
200 S Willow St
Jackson, WY 83001

Re: Town of Jackson Draft Wildlife Friendly Fencing LDR AMD

Dear Planning Commissioners,

Thank you for the opportunity to comment again on the proposed updates to the Town of Jackson's wildlife-friendly fencing Land Development Regulations (LDRs). We appreciate the Commission's thoughtful discussion on April 15, 2026, and the subsequent revisions made by staff, which have significantly improved the clarity and considerations for wildlife in the current draft.

Overall, the revised draft shows meaningful progress. Together, Jackson Hole Wildlife Foundation and Jackson Hole Conservation Alliance offer the following remaining recommendations for consideration:

1. Front yard exclusionary fence height

We are concerned that the proposed four-foot height limit for front yard exclusionary fences does not meet the stated goal of excluding wildlife. At this height, the fence is not wildlife friendly, and yet deer and moose can still attempt to cross, increasing the risk of injury or being hung up.

To better align with the intent of exclusionary fencing, we recommend either:

- Prohibiting exclusionary fences in front yards; or
- Requiring front yard exclusionary fences to meet effective exclusion heights (generally six feet or greater) to prevent conflict.

2. Dead-end enclosures and egress

We appreciate the removal of sliding or drop-down panels in dead-end enclosures. However, we remain concerned that fence configurations with a single, fully-open ingress point may still unintentionally create dead-end conditions.

If wildlife, particularly juvenile ungulates, can enter a fenced area but cannot reasonably locate or physically navigate an exit (as described in Section 5.1.2.D.2.iv), the risk of entrapment remains high. Specifications in the most recent update to the LDR, e.g., 38-inch heights, may prevent successful egress for juveniles without other modifications since they generally cannot jump this height.

To reduce the risk from dead-end enclosures, we recommend:

- Requiring at least two (opposing) openings in any fence configuration to ensure animals can exit as easily as they enter; or
- Incorporating design allowances for juveniles, such as a bottom wire or rail height of at least 18 inches.

If one side of a fence is already open, adding a second opening does not compromise its functional purpose but significantly reduces wildlife risk. Additionally, requiring at least one gate in all fences, including exclusionary fences, to allow for emergency release of trapped animals.

We also recommend that wildlife escape features be required for window wells or that entrance to window wells is blocked, as suggested by WGFD (April 28, 2026 letter to Town of Jackson).

3. Replacement of nonconforming fences

In Teton County, allowing up to 25% replacement of nonconforming fencing “in kind” has proven difficult to monitor and enforce and there have been multiple infractions reported. This provision can lead to prolonged noncompliance and ambiguity in enforcement.

To improve clarity and long-term effectiveness, we recommend requiring that all fence repairs and replacements comply with current LDR standards unless a formal variance of hardship is granted. Eliminating the 25% provision would create a clearer, more enforceable standard.

4. Buck and rail fencing

We recommend that buck and rail fencing be permitted only where necessary for livestock containment and where wildlife-friendlier alternatives are not feasible. In other cases, approval should require formal exemption from planning staff.

Other non-standard fence designs, including fences with varying heights, should similarly require staff review and approval to ensure consistency with wildlife-friendly objectives.

5. Tier requirements

We find the description of the tiered requirements in Section G both difficult to interpret and inconsistent with the intent of Policy 1.1 of the Comprehensive Plan, which calls for design approaches that promote wildlife permeability and reduce human–wildlife conflict. Similarly, the Wyoming Game and Fish Department’s April 28, 2026 letter to the Planning Department emphasizes three core principles: maintaining wildlife permeability, avoiding entrapment, and minimizing human–wildlife conflict. As they note, “...if individual parcels are fully enclosed with exclusionary fencing, wildlife movement could be constrained to roads and sidewalks, increasing the potential for conflict or entrapment.”

As currently drafted, the base and mid tiers appear to allow precisely this outcome.

We recommend simplifying Section G to more clearly align with both the Comprehensive Plan and Wyoming Game and Fish Department guidance. A consistent, town-wide requirement for wildlife-friendly fencing would support permeability and prevent entrapment, particularly when paired with the proposed material prohibitions. To address human–wildlife conflict, limited allowances for small, fully enclosed areas (e.g., for pets, gardens, or trash) could be included. We also recognize the desire for privacy fencing; this could be accommodated through short, non-continuous stretches of privacy panels that do not fully enclose parcels.

This approach would more directly and effectively achieve the shared goals of permeability, avoidance of entrapment, and minimization of conflict.

6. Graphic for swale, gully, or drop in elevation

To help improve interpretability of section 5.1.2.F, we recommend including a graphic, similar to the one attached below.

Thank you for your continued commitment to balancing community development with wildlife conservation. We appreciate the opportunity to contribute to this important effort and would be happy to provide additional information or clarification.

Sincerely,

Renee Seidler

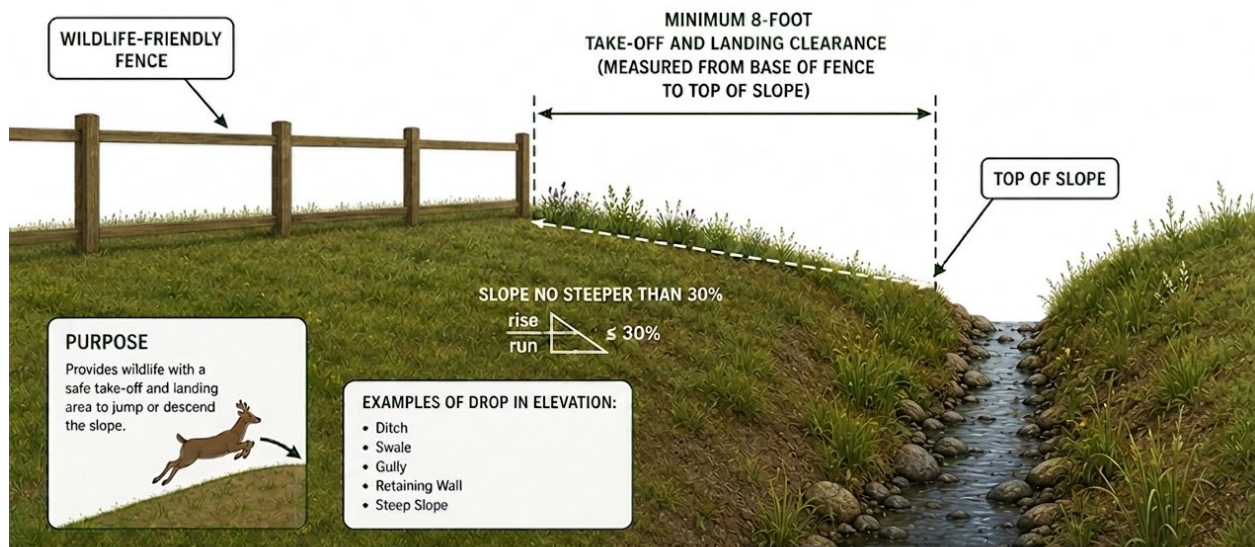
Renee Seidler
Executive Director
Jackson Hole Wildlife Foundation

Amy Kuszak

Amy Kuszak
Community Planning Director
Jackson Hole Conservation Alliance

FENCING ADJACENT TO A SWALE GULLY OR DROP IN ELEVATION

A minimum 8-foot take-off and landing clearance area shall be maintained with a slope no steeper than 30% between the fence and the top of slope.



KEY POINTS

- Maintain a minimum 8-foot horizontal clearance from the base of the fence to the top of slope.
- The slope within this clearance area must be no steeper than 30%.