



TOWN OF JACKSON PLANNING & BUILDING DEPARTMENT

TRANSMITTAL MEMO

Town of Jackson

- Public Works/Engineering
- Building
- Title Company
- Town Attorney
- Police

Joint Town/County

- Parks and Recreation
- Pathways
- Joint Housing Dept

Teton County

- Planning Division

- Engineer
- Surveyor- *Nelson*
- Assessor
- Clerk and Recorder
- Road and Levee

State of Wyoming

- Teton Conservation
- WYDOT
- TC School District #1
- Game and Fish
- DEQ

Federal Agencies

- Army Corp of Engineers

Utility Providers

- Qwest
- Lower Valley Energy
- Bresnan Communications

Special Districts

- START
- Jackson Hole Fire/EMS
- Irrigation Company

Date: March 23, 2023

Item #: P23-034

Planner: Katelyn Page

Phone: 733-0440 ext. 1302

Email: kpage@jacksonwy.gov

Owner
1490 JHWS LLC
PO Box 12118
Jackson, WY 83002

Applicant
Matthew Scott
PO Box 11396
Jackson, WY 83002

REQUESTS:

The applicant is submitting a request for a Conditional Use Permit for an outfitter / tour operator business at the property located at 1490 Gregory Lane, legally known as LOT 4, MARTIN ADDITION PIDN: 22-40-16-06-1-09-004

For questions, please call Katelyn Page at 733-0440, x1302 or email to the address shown below. Thank you.

Please respond by: **April 12, 2023 (with Comments)**

RESPONSE: For Departments not using SmartGov, please send responses via email to:
alangley@jacksonwy.gov



PLANNING PERMIT APPLICATION
Planning & Building Department

150 E Pearl Ave. | ph: (307) 733-0440
P.O. Box 1687 | www.townofjackson.com
Jackson, WY 83001

For Office Use Only

Fees Paid _____

Date & Time Received _____

Application #s _____

Please note: Applications received after 3 PM will be processed the next business day.

PROJECT.

Name/Description: _____

Physical Address: _____

Lot, Subdivision: _____ PIDN: _____

PROPERTY OWNER.

Name: _____ Phone: _____

Mailing Address: _____ ZIP: _____

E-mail: _____

APPLICANT/AGENT.

Name: _____ Phone: _____

Mailing Address: _____ ZIP: _____

E-mail: _____

DESIGNATED PRIMARY CONTACT.

_____ Property Owner _____ Applicant/Agent

TYPE OF APPLICATION. Please check all that apply; review the type of application at www.townofjackson.com/200/Planning

Use Permit

Basic Use

Conditional Use

Special Use

Relief from the LDRs

Administrative Adjustment

Variance

Beneficial Use Determination

Appeal of an Admin. Decision

Physical Development

Sketch Plan

Development Plan

Design Review

Subdivision/Development Option

Subdivision Plat

Boundary Adjustment (replat)

Boundary Adjustment (no plat)

Development Option Plan

Interpretations

Formal Interpretation

Zoning Compliance Verification

Amendments to the LDRs

LDR Text Amendment

Map Amendment

Miscellaneous

Other: _____

Environmental Analysis

PRE-SUBMITTAL STEPS. To see if pre-submittal steps apply to you, go to www.townofjackson.com/200/Planning and select the relevant application type for requirements. Please submit all required pre-submittal steps with application.

Pre-application Conference #: _____ Environmental Analysis #: _____
Original Permit #: _____ Date of Neighborhood Meeting: _____

SUBMITTAL REQUIREMENTS. Please ensure all submittal requirements are included. The Planning Department will not hold or process incomplete applications. Partial or incomplete applications will be returned to the applicant. Go to www.townofjackson.com/200/Planning and select the relevant application type for submittal requirements.

Have you attached the following?

Application Fee. Fees are cumulative. Go to www.townofjackson.com/200/Planning and select the relevant application type for the fees.

Notarized Letter of Authorization. A notarized letter of consent from the landowner is required if the applicant is not the owner, or if an agent is applying on behalf of the landowner. Please see the Letter of Authorization template at <http://www.townofjackson.com/DocumentCenter/View/845/LetterOfAuthorization-PDF>.

Response to Submittal Requirements. The submittal requirements can be found on the TOJ website for the specific application. If a pre-application conference is required, the submittal requirements will be provided to applicant at the conference. The submittal requirements are at www.townofjackson.com/200/Planning under the relevant application type.

Note: Information provided by the applicant or other review agencies during the planning process may identify other requirements that were not evident at the time of application submittal or a Pre-Application Conference, if held. Staff may request additional materials during review as needed to determine compliance with the LDRs.

Under penalty of perjury, I hereby certify that I have read this application and associated checklists and state that, to the best of my knowledge, all information submitted in this request is true and correct. I agree to comply with all county and state laws relating to the subject matter of this application, and hereby authorize representatives of Teton County to enter upon the above-mentioned property during normal business hours, after making a reasonable effort to contact the owner/applicant prior to entering.

Matthew Scott

Signature of Property Owner or Authorized Applicant/Agent

_____ Date

Name Printed

_____ Title

CUP APPLICATION NARRATIVE FOR 1490 JHWS, LLC AT 1490 GREGORY LANE

Introduction. In July 2022, 1490 JHWS, LLC (“1490 JHWS”) purchased the property at 1490 Gregory Lane (Lot 4, Martin Addition, PIDN: 22-40-16-06-1-09-004), which is .65 acres (28,314 sq. ft) (“the Property”). 1490 JHWS submits this CUP Application to allow Jackson Hole Wildlife Safaris, LLC (“JHWS”) to use the Property as an operational base to serve clients for its wildlife tour business in Grand Teton and Yellowstone National Parks, and the National Elk Refuge. This use is an established and allowed commercial use in this zone, BP-ToJ 2.3.10, and Tour Operator/Outfitter is an explicit allowable use in this zone (see, LDR §§ 2.3.10.C and 6.1.7E). JHWS has been in business since 2007.

Description of Current Use and Proposed Use. The Property is a .65-acre (28,314 sq. ft.) lot with a commercial building on it containing 3481.38 sq. ft of Habitable Space (see, LDR § 9.5), an attached garage (334.36 sq. ft.) and a stand-alone double garage (836 sq. ft., for a total of 1170.36 sq. ft. of Uninhabitable Space, see, LDR § 9.5) (together, “the Structures,” which, totaled, comprise 4,651.74 sq. ft. of both Habitable and Uninhabitable Space). See, *Floor Plan* attached hereto as *Exhibit A*; *Parking Plan* attached hereto as *Exhibit B*; *Square Footage Spreadsheet* attached hereto as *Exhibit C*; *Grading Site Plan* attached hereto as *Exhibit D*.)

The Structures were inspected at closing in July 2022, and were found to be in good condition with no deficiencies, and with no improvements required. The Property has five (5) dedicated office spaces that are currently leased to three (3) tenants, who were already leasing the office spaces from the prior owner (the Martin family) when

1490 JHWS purchased the Property. To 1490 JHWS's knowledge, all of the below-identified tenants were pre-existing nonconforming uses when 1490 JHWS purchased the Property. When 1490 JHWS purchased the Property, it was not aware that "office" space was not permissible in the "light industry" zone. 1490 JHWS is hopeful that it will not have to evict the current tenants who are using portions of the Property for office space, as they have been operating on the Property since before 1490 JHWS purchased it, and the current tenants do not wish to move their businesses to a different building, and deal with all of the time, labor, and risks associated with moving (i.e., higher rent, not being able to find available office space at all). 1490 JHWS and its current tenants desire to work with the Town to avoid that situation if possible.

Direct Response Marketing ("DRM") occupies Unit 1A, Office 1A, on the southeast corner of the Property on the first floor, which is 329.11 sq. ft. (see, Exs. A & C, which identifies each unit, tenant, and square footage). DRM has one (1) employee that only works on-site as a mental therapist, Monday, Wednesday and Friday 9:00 a.m. to 5:00 p.m. With only one (1) employee and one (1) client using parking at a time on those three (3) weekdays, there are not clients of DRM coming and going that will require extra parking or negatively affect traffic or add to density.

The Anti-Aging Medical Associates ("AAMA" d/b/a Wyoming Center for Optimal Health ("WCOH")) occupies Unit 2, which is 1138.33 sq. ft. (see, Exs. A & C) on the north side of the Property on the first floor. WCOH 's Medical Director, Dr. James Raniolo, is the owner, has one (1) receptionist, and only treats one (1) patient at a time, Monday through Friday 9:00 a.m. to 5:00 p.m. The typical number of clients of WCOH

coming and going during those hours will not require extra parking or negatively affect traffic or add to density. WCOH is Wyoming's premier anti-aging medicine practice. WCOH 's Medical Director, Dr. James Raniolo, is board-certified in Family Practice, and board-certified as well as advanced fellowship-trained in anti-aging, functional and regenerative medicine. WCOH treats most symptoms and conditions related to aging, and offers an array of advanced testing, bio-identical hormone therapy for women and men, and intra-venous therapies like Meyer's cocktails. Dr. Raniolo offers concierge medical programs (he will treat or consult with clients at their home or hotel) for those clients who value privacy above all else.

Teton Behavior Therapy ("TBT") occupies both Unit 3, which is 817.62 sq. ft. and Unit 4 , which is 764.24 sq. ft., a total of 1581.86 sq. ft. on the second floor of the Property. See, Exs. A & C. TBT has six (6) employees that work on-site, two (2) of which are office staff, Monday through Friday 9:00 a.m. to 5:00 p.m. TBT provides mental health counseling for local adults, children, and families in assessing their needs and attaining their goals, whether the focus is on behavioral health, executive functioning, other life challenges. It provides these critical services as the only occupational and behavioral therapist business in Jackson, and serves approximately twenty (20) clients per day.

JHWS intends to lease Unit 1B, Office 1B, which is 296.81 sq. ft. (see, Exs. A & C, on the southwest corner of the Property, as storage space and as explained further below. JHWS currently employs two (2) office staff who work completely remotely, and eight (8) guides, none of which will be using the Structures as an office. With regard to

JHWS, the Property will be used for parking of JHWS business vehicles, JHWS guide vehicles, vehicle staging, vehicle interior cleaning (exterior cleaning will be done at local car washes), and parking for the other existing tenants identified above. JHWS customers will never come to the Property; they will be picked up from their place of lodging or their home. JHWS will use Unit 1B to store tour and cleaning supplies, and to have a bathroom for guides. JHWS shall not use the Structures for office space.

Again, while 1490 JHWS understands that offices are not permissible uses in the “light industry” zoning for the Property, these businesses have been historically good tenants for the previous owner of the Property, and have been good tenants for 1490 JHWS since it purchased the Property. 1490 JHWS does not want to have to evict these tenants, but will work with the Town to do what is necessary for the use of the Property to be permissible.

The current tenants’ use of the Property does not have, or invite, a heavier flow of invitees or licensees onto the Property than what has typically occurred on this Property, and JHWS’s use will not do so, either. JHWS’s proposed use complies with the standards in LDR § 6.1.7.E outfitter/tour operator. 1490 JHWS believes that its proposed use and the current tenants’ use minimizes adverse visual impacts, as no building or trees are being affected, and 1490 JHWS is enhancing the visual impact of the parking lot. The proposed change in use will not have any adverse environmental impact of which 1490 JHWS is aware. 1490 JHWS does not believe that any current use or proposed use will have any nuisance impact, and it will have minimal effect on

public facilities, as set forth above. 1490 JHWS believes that JHWS's applied use complies with LDRs and town ordinances.

Upon information and belief, the current tenants' uses do not appear to comply with town LDRs, because they are personal services being offered in office space. 1490 JHWS will ensure that its tenants will conform to any requirements under any CUP that the Town finds appropriate. JHWS's proposed use shall be in conformance with all standards and conditions of any prior applicable permits and approvals.

1490 JHWS does not intend to develop or improve the Structures from their current state, or to have more employees working in the Structures, but simply plans to pave more of the parking lot (as discussed further below and in 1490 JHWS's application to expand and improve the parking area with asphalt, according to the attached *Site Plan*).

Parking Compliance.

According to LDR § 6.2.2 (explained in more detail below), and given the current tenants' use and the proposed use by JHWS, it appears that the Property will need to have twenty-four (24) total parking spaces. The current tenants use the Property as commercial office space, with a total gross floor area of sq. ft. (Unit 1A and Units 2-4, plus the attached garage) $(3519.74/1000 \times 3.3 = 11.61)$, and thus will need twelve (12) parking spaces. See, Exs. A, B & C.

A. Current Tenants using Office Space:

- 1) DRM occupies Unit 1A, Office 1A, on the southeast corner of the Property on the first floor (329.11 sq. ft., see, Exs. A & C). DRM has

one (1) employee that only works on-site as a mental therapist, Monday, Wednesday and Friday 9:00 a.m. to 5:00 p.m. With only one (1) employee and one (1) client of DRM using parking at a time on those three (3) weekdays, there are not clients of DRM coming and going that will require extra parking or negatively affect traffic or add to density. DRM has two (2) dedicated parking spaces on the Property. See, Exs. A, B & C.

- 2) AAMA (d/b/a WCOH) occupies Unit 2 on the north side of the Property on the first floor (1138.33 sq. ft., see, Exs. A & C). WCOH 's Medical Director, Dr. James Raniolo, is the owner, has one (1) receptionist, and only treats one (1) patient at a time, Monday through Friday 9:00 a.m. to 5:00 p.m. WCOH will only need three (3) spaces maximum, specifically identified in the attached *Parking Plan*. Therefore, WCOH will not require extra parking or negatively affect traffic or add to density. One of DRM's parking spaces is in the attached garage which will be blocked by his receptionist or client. Neither will be an issue, as Dr. Raniolo will always be present when both are on property. See, Exs. A, B & C.

- 3) TBT occupies Unit 3 (817.62 sq. ft.) and Unit 4 (764.24 sq. ft., a total of 1581.86 sq. ft.) (see, Exs. A & C) on the second floor of the Property. TBT has six (6) employees that work on-site, two (2) of whom are office staff, Monday through Friday 9:00 a.m. to 5:00

p.m. TBT provides mental health counseling for local adults, children, and families in assessing their needs and attaining their goals, whether the focus is on behavioral health, executive functioning, other life challenges. It provides these critical services as the only occupational and behavioral therapist business in Jackson, and serves approximately twenty (20) clients per day. TBT has seven (7) dedicated parking spaces on the Property, specifically identified in the attached *Parking Plan*. These parking needs and the flow of clients in and out of the Property do not increase what has typically occurred on this Property, prior to 1490 JHWS's purchase of the Property. See, Exs. A, B & C.

B. JHWS:

JHWS will use the Property as a tour/outfitter, with a total gross floor area of 1132 sq. ft. (Unit 1B plus the detached garage), will need ten (10) additional parking spaces ($1132/1000 \times 1 = 11.61$ plus one company vehicle), and thus will need twelve (12) parking spaces. See, Exs. A, B & C.

JHWS has ten (10) vehicles that operate in the Town of Jackson, which will be parked at the Property overnight. JHWS employees will use the Property for parking and stocking JHWS touring vehicles between 5:00 a.m. and 7:00 a.m., and occasionally between noon and 2:00 p.m. for afternoon trips, Monday through Sunday. JHWS employees will then return the vehicles between 5:00 p.m. and 7:00 p.m. The stand-alone 22'x38' double garage (836 sq. ft.), will be used to park four (4) JHWS vehicles. Six

(6) additional parking spaces will be outdoors. The garage spaces are tandem with the spaces outside and JHWS will schedule vehicles accordingly to minimize vehicle shuffling. Tandem spaces will only be used by JHWS. Employees of JHWS will swap their personal vehicle for a touring vehicle, so additional guide parking is not needed. JHWS primarily operates outside of normal business hours, so tenant parking will be used to temporarily park guides' personal vehicles or for shuffling tandem vehicles during the vehicle swap.

1490 JHWS has submitted an application to expand and improve the parking area with asphalt, according to the attached *Site Plan*. This will support JHWS's parking needs. All of the typical outdoor parking spaces are 9'x20', which is standard. The ADA space is 8'x20' with an 8' aisle. Before the asphalt is added, 1490 JHWS intends to create EV-capable parking spaces to support EV charging stations to be used when EVs are available and can support JHWS's distance needs.

According to LDR § 6.2.2, and given its current use is commercial office and proposed use is tour/outfitter, this Property will need twenty-four (24) parking spaces, 23 of which are shown on the attached *Parking Plan (Ex. B)*. Please note that those twenty-four (24) parking spaces do not include the four (4) spaces that 1490 JHWS intends to lease from The Town of Jackson, as the previous owner, the Martin family, did.

1490 JHWS has already submitted an application to lease the 20'x40' parking area from the Town of Jackson, which will not be used by JHWS, but will be used by the other four (4) commercial tenants (as has been true since before 1490 JHWS purchased

the Property). Without the parking lease, 1490 JHWS will likely have to evict the current tenants, who have been operating on the Property prior to 1490 JHWS purchasing the Property. This 20'x40' lot was leased by the Town of Jackson to the previous Owner (the Martin family) in October of 2020 for \$100.00 a year, and two (2) of those spaces were allowed to offset parking requirements.

Findings for Approval pursuant to LDR § 8.4.3.

The proposed use of the Property meets the standards set forth in LDR § 8.4.3 as follows:

- a. The proposed use by JHWS and the existing tenants is compatible with the desired future character of the area, because while the zoning for the Property is "light industrial," many of the surrounding businesses on Gregory Lane have significantly larger, louder, and denser operations than JHWS. Neither JHWS nor the existing tenants will be operating heavy machinery or receiving large, semi-truck deliveries in their operations, like many of the businesses on Gregory Lane do. There will not be noisy operations like those associated with surrounding light industry businesses on Gregory Lane, like construction, processing, packaging & distributing of food or beverages, welding & machine, industrial laundries, and/or cleaning or janitorial services. None of the potentially toxic, polluting, congesting, and loud impacts related to the afore-mentioned other "light industry" businesses will be created by JHWS or the current tenants at the Property. 1490 JHWS and its tenants intend to run the businesses on the Property in such a manner that

protects the health, safety, and welfare of current and future residents of the community, and ensures conformance and coordination of physical development, use, development options, and subdivision with the public improvement and other plans of the community.

- b. As set forth above and herein, the proposed use is generally compatible with the character of the “light industrial” zoning, because the configuration, density, and intensity of the proposed use will not be adverse to the desired character of Gregory Lane. The current tenants’ and JHWS’s proposed use of the Property, as set above, is a less impactful use of the Property than the businesses that are categorized as “light industrial” in the LDRs, so its use complies with the use-specific standards of LDR § 8.4.3.
- c. The Property has adequate landscaping, fencing and/or screening to minimize adverse visual impacts to the community.
- d. The adverse environmental impacts to the community will be minimal because of the aforementioned lack of added density, traffic, and congestion to the neighborhood by the current tenants’ and by JHWS’s proposed use. The current tenants’ use will not increase what has typically occurred on this Property, prior to 1490 JHWS’s purchase of the Property.
- e. Similarly, there will be no nuisances created by the current tenants’ and by JHWS’s proposed use, especially in comparison to the surrounding businesses that are actually categorized as “light industry.”

f. There will be no adverse impacts to public facilities, because all of the current tenants, their employees and clients, will be able to use bathroom and parking facilities already in existence on the Property. None of JHWS's clients will ever be on the Property, and JHWS's guides will also be able to use bathroom and parking facilities already in existence on the Property.

g. There are no other standards, LDRs, or Town ordinances with which the current tenants or JHWS will not comply.

h. In summary, the current tenants and JHWS are in substantial compliance with all other relevant standards set forth in the LDRs and Town ordinances.

Variances. The Property has two variances. The first variance is 95-29C, which allows a building front setback of 10' rather than 20' from Gregory Lane. The second variance is 95-29B, which allows an 18' setback from the top of the bank of Flat Creek, where a 50' setback is required.

Housing Mitigation. 1490 JHWS's understanding, in the simplest of terms, is that the purpose of the housing mitigation exaction is to mitigate anticipated negative impacts (general costs, meaning economically, environmentally, and the need for employee housing, etc.) of new development on a property in Jackson. 1490 JHWS does not intend to do any new development on the Property regarding habitable space, nor will it be using the Structures as an office. Even if 1490 JHWS is changing one use of the Property from its prior use by the Martins, it appears that there is no nexus, or basis, for the Town to exact a fee against 1490 JHWS if the number of employees using that building is equal to or lesser than the previous use. Since JHWS will not use any of the

Structures for office space, it is not generating more employees out of the Property than the previous use, and therefore, the Town should not assess an exaction against 1490 JHWS for housing mitigation. This is true even if the prior owners, the Martins, never paid a housing mitigation fee (for the offices and businesses that were already using the Structures when 1490 JHWS bought the Property).

In *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard* 512 U.S. 374 (1994), the U.S. Supreme Court set forth a two-prong test to determine whether a development exaction (here, housing mitigation fees) violates the Takings Clause as an uncompensated taking. First, the court must determine whether an “essential nexus” exists between the legitimate state interest to be advanced by the restriction on development and the condition exacted by the government. Second, the court must determine whether there is a “rough proportionality” between the condition exacted and the projected impact of the development.

Since there will be no development, and no parts of the Structures will be used as office space besides what existed prior to 1490 JHWS purchasing the Property, 1490 JHWS’s proposed use is not more employee-intensive than what is currently there, and therefore, 1490 JHWS is not contributing to a new need for employee housing (by bringing in more employees and exacerbating the housing problem). 1490 JHWS asserts that it appears that there is neither an essential nexus, nor a rough proportionality, for the Town to impose housing mitigation when there will be no development of the Structures, and no more employees using the Property as office space. If an exaction for housing mitigation is appropriate, 1490 JHWS should only be subject to an exaction for

any number of employees its use adds to the Property from the prior use, i.e., the "new" impact.

Miscellaneous. 1490 JHWS is aware of, and shall abide by, the general requirements for the CUP, as well as the Operational Standards set forth in LDR § 6.4, regarding trash and recycling, snow removal, snow storage, exterior lighting, signage, scenic standards, noise, vibration, electrical disturbance, fire and explosive hazards, heat and humidity, radioactivity, and any and all other requirement not listed here, but set forth in the LDRs.

Exhibit B - Parking Plan

CIB Site Plan

CUP Permit
Submittal

1490 Gregory Lane
Jackson, WY

Landscape Design
P.O. Box 9090
Jackson, Wyoming
perennialwest@gmail.com
Drawing Date: 1/27/2023
Drawn By: TBL

101

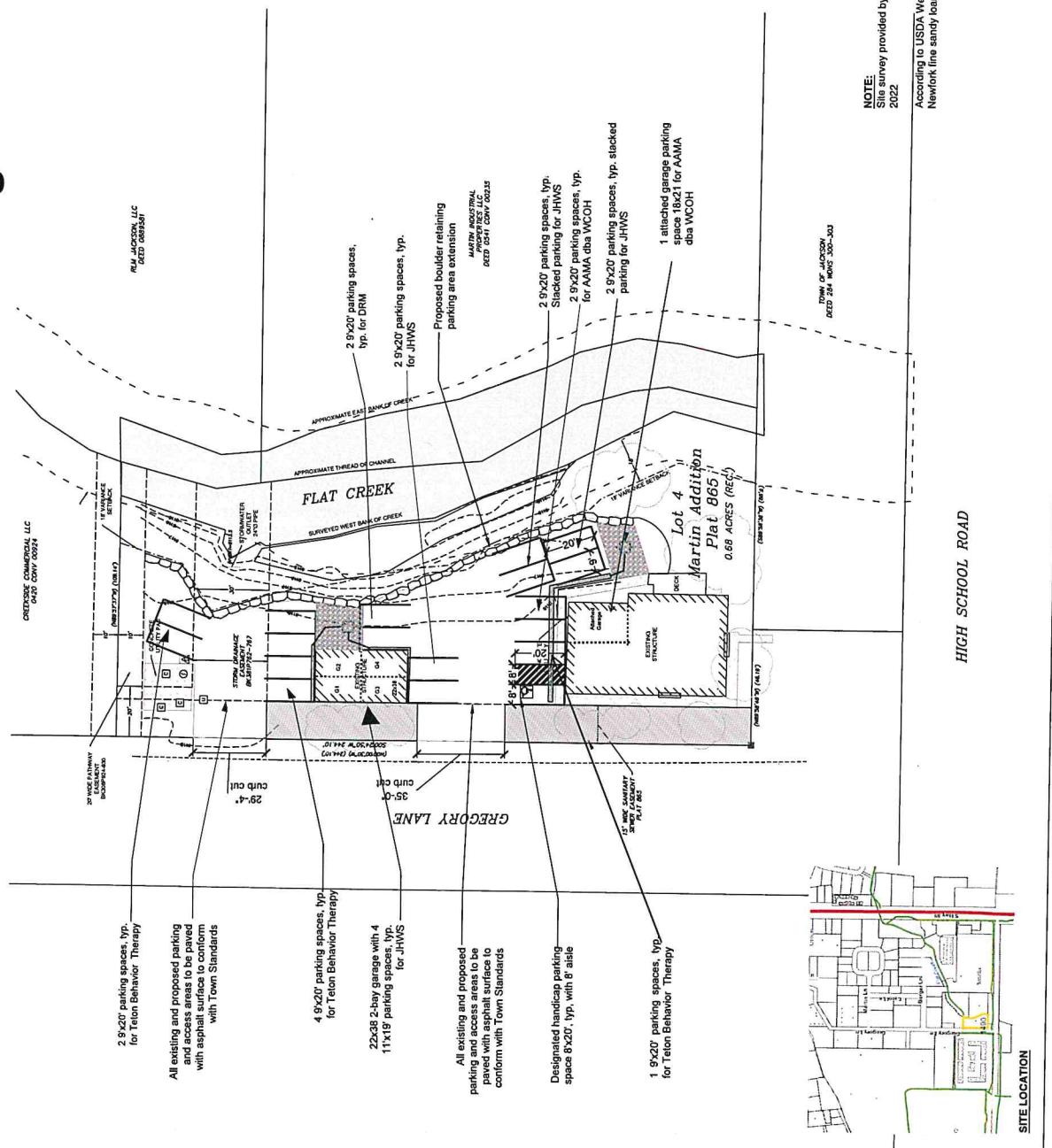


Exhibit C - Square Footage Spreadsheet

| | Unit 1 | Unit 2 | Unit 3 | Unit 4 | Entryway | Garage |
|-------------------|---------------|----------------|---------------|---------------|--------------|---------------|
| Reception | | 97.97 | 87.6 | 87.6 | 85.27 | 334.36 |
| Office A | 279.45 | 106.4 | 147.76 | 130.01 | | |
| Office B | 266.85 | 212.56 | 136.21 | 128.8 | | |
| Office C | | 143.08 | 59.62 | 55.28 | | |
| Office D | | 93.74 | 88.38 | 86.89 | | |
| Lavatory A | 49.66 | 39.05 | 47.09 | 43.66 | | |
| Lavatory B | 29.96 | 89.58 | | | | |
| Hall | | 355.95 | 250.96 | 232 | | |
| TOTAL | 625.92 | 1138.33 | 817.62 | 764.24 | 85.27 | 334.36 |

| | Only Office | Office w/ entry | All w/ garage |
|-----------------|----------------|--------------------|------------------|
| Unit 1 | 625.92 | 625.92 | 764.24 |
| Unit 2 | 1138.33 | 1138.33 | 817.62 |
| Unit 3 | 817.62 | 817.62 | 625.92 |
| Unit 4 | 764.24 | 764.24 | 1138.33 |
| Entryway | | 85.27 | 85.27 |
| Garage | | | 334.6 |
| TOTAL | 3344.11 | 3481.38 | 3765.98 |

| | Gross Floor Area |
|--|------------------|
| Current Tenants' Office Space & Attached Garage | 3481.38 |
| JHWS & Detached Garage | 1132 |
| TOTAL | 4613.38 |

Exhibit D - Grading Site Plan

CERTIFICADO COMERCIAL

| No. | REVISIONS | DATE |
|-----|-------------------------------|-----------|
| 1 | Additional parking Seating | 2/23/2023 |
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CJP Site Plan

CUP Permit
Submit

1490 JHWS, LLC
1490 Gregory Lane
Jackson, WY

Landscape Design
P.O. Box 9090
Jackson, Wyoming
perennialwest@gmail.com
Drawing Date: 1/27/2023
Drawn By: TBL

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NOTE:
Site survey provided by Jorgensen Engineering December
2022

According to USDA WebSoilSurvey the entire site contains

HIGH SCHOOL ROAD