



# TOWN OF JACKSON

## PLANNING & BUILDING DEPARTMENT

### TRANSMITTAL MEMO

**Town of Jackson**

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

**Joint Town/County**

- Parks & Recreation
- Pathways
- Joint Housing Dept.

**Teton County**

- Planning Division
- Engineer
- Surveyor
- Assessor
- Clerk & Recorder
- Road & Levee

**State of Wyoming**

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

**Federal Agencies**

- Army Corp of Engineers

**Utility Providers**

- Qwest
- Lower Valley Energy
- Bresnan Communications

**Special Districts**

- Start
- Jackson Hole Fire/EMS
- Regional Transportation

Date: July 31, 2025	<b>REQUEST:</b>
Item: P25-031	The Applicant is submitting a request for an LDR Text Amendment to amend the text of the Land Development Regulations pursuant to Section 8.7.1. to change the String Lighting Policy to the Town of Jackson Exterior Lighting Standards, LDR 5.3.1, in order to safeguard dark night skies and ensure future compliance with the County's Dark Sky Community Certification.
Planner: Andrew Bowen Phone: 733.0440 ext. 1306 Email: <a href="mailto:abowen@jacksonwy.gov">abowen@jacksonwy.gov</a>	For questions, please call Andrew Bowen at 733-0440, x 1306, or email to the address shown below. Thank you.
<b>Please respond by: August 15, 2025</b>	
For Departments not using SmartGov, please send responses via email to <a href="mailto:planning@jacksonwy.gov">planning@jacksonwy.gov</a>	



**PLANNING PERMIT APPLICATION**  
**Planning & Building Department**

150 E Pearl Ave. | ph: (307) 733-0440  
P.O. Box 1687 | [www.townofjackson.com](http://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](http://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](http://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](http://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](http://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](http://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.



Signature of Property Owner or Authorized Applicant/Agent

Date

Name Printed

Title

Application for a  
Land Development Regulation  
Amendment

Submittal date: July 25, 2025

Applicant:

Wyoming Stargazing  
PO Box 9584  
Jackson, WY 83002  
307-413-4779  
[samuel@wyomingstargazing.org](mailto:samuel@wyomingstargazing.org)

## **Introduction**

This application proposes to amend the following components of the Town of Jackson Land Development Regulations Article 5 ('Physical Development Standards Applicable in All Zones'):

- Div. 5.3. ('Scenic Standards'), §5.3.1. ('Exterior Lighting Standards')
  - Section 9: String Lighting

We propose changes to the String Lighting Policy to the Town of Jackson Exterior Lighting Standards in order to safeguard dark night skies and ensure future compliance with the County's Dark Sky Community Certification. The proposed amendment would alleviate issues with the proliferation of string lighting, difficulties in enforcing and complying with existing policies, and would be consistent with the goals of Policy 1.3.d ("Maintain dark night skies") in the Town of Jackson Comprehensive Plan's 'Environmental Stewardship' section as well as Teton's County's commitment to be 100% dark sky compliant by 2030.

In accordance with the requirements set forth in the Land Development Regulations (LDRs) this application will outline that the proposed amendment to the exterior lighting standard:

- Is consistent with the purposes and organization of the LDRs;
- Improves the consistency of the LDRs with other provisions of the LDRs;
- Provides flexibility for landowners within standards that clearly define desired character;
- Is necessary to address changing conditions, public necessity, and/or state or federal legislation;
- Improves implementation of the Comprehensive Plan; and
- Is consistent with other adopted Town of Jackson Resolutions.

## **Overview: Maintaining Dark Skies**

Preserving Town of Jackson's natural character is central to the 'Vision and Common Values' of the Comprehensive Plan, which emphasizes that "to achieve our desired community character, the community must protect and enhance the ecosystem in which we live." Maintaining the region's dark night skies is enumerated as a specific goal of the Plan. It specifically calls for looking "beyond daytime viewsheds" in guiding sensible development in the future:

*Lighting of individual developments cumulatively impacts the ability to see dark and starry night skies. Although lighting is required for public safety, especially along pedestrian corridors, non-essential lighting will be limited and all lighting will be designed to meet dark skies best practices. Existing development will also be encouraged to implement best practices.*

In order to maintain dark night skies and ensure compliance with Town of Jackson's Dark Sky Community Certification

The purpose of the Town of Jackson Exterior Lighting Standard (§5.3.1.) is “to allow necessary and reasonable lighting of public and private property for the safety, security, and convenience of occupants and the general public, while eliminating or reducing the nuisance and hazards of light pollution, including, but not limited to: glare, light trespass, sky glow, energy waste, and negative impacts on the nocturnal environment.” It is housed in the County’s LDRs’ ‘Scenic Standards’ Division (5.3), which finds that “dark skies are vital to the community’s natural character.”

### **Proposed String Lighting Policy**

9. **String Lighting.** String lighting consists of individual light sources that are connected by free-strung wires or are placed inside tubing that result in many points of light.
  - a. String lighting may be installed in any zone with the following provisions and restrictions:
    - i. All individual light sources (bulbs or individual LEDs) on string lighting shall not exceed fifty (50) lumens per source.
    - ii. String lighting shall not be used to outline or highlight a building or portion of a building.
    - iii. String lighting shall comply with the regulation on Moving Signs (Section 5.6.2.D.1).
    - iv. String lighting shall comply with the regulation on Color Temperature (5.3.1.B.3). This means that green, blue, indigo, and violet (purple) light sources are prohibited as well as white light sources that have a color temperature greater than 3000K.
    - v. String lighting shall comply with the regulation on Total Exterior Light Output (5.3.1.B.2).
    - vi. String lighting shall comply with the regulation on Light Trespass (5.3.1.B.4).
    - vii. String lighting shall be controlled with a programmable timer switch.
    - viii. String lighting shall be extinguished no later than two hours after sunset until one hour before sunrise on the following day.
  - b. Exemptions
    - i. String Lighting used by businesses and establishments open to the public shall be:
      1. Exempt from the regulation on Light Trespass (5.3.1.B.4) and the curfew in this section (5.3.1.B.9.a.viii).

- 2. Extinguished at the end of the business's or establishment's normal business hours or by 11pm (whichever is earlier) and shall remain extinguished until one hour before sunrise the following day.
- ii. String Lighting beginning December 1st and continuing until January 15th shall be:
  - 1. Exempt from the following regulations:
    - a. Maximum lumen allowance per individual light source (5.3.1.B.9.a.i)
    - b. Building outlining or highlighting ([5.3.1.B.9.a.ii](#))
    - c. Sign Standards (5.6.1.E.6.a.i, 5.6.2.D.1)
    - d. Color Temperature (5.3.1.B.3)
    - e. Total Exterior Light Output (5.3.1.B.2)
    - f. Light Trespass (5.3.1.B.4)
    - g. The timer switch requirement (5.3.1.B.9.a.vii)
    - h. The curfew in this section (5.3.1.B.9.a.viii)

### **Consistency with LDRs**

Our proposed amendments propose different treatments between uses of year-round string lighting compared to season holiday lighting. Our amendments also adhere to the original purposes of the exterior lighting standard to:

**§1.3.1.: “Preserve and protect the area’s ecosystem in order to ensure a healthy environment, community, and economy for current and future generations.”** Given the rapidly maturing scientific understanding of the problem of light pollution and the ecological consequences of artificial light at night, sufficient evidence exists to support the proposition that a healthy and resilient environment requires accessible nighttime darkness. In particular, given the rural nature of the predominantly public lands surrounding and adjacent to Town of Jackson, its nighttime light impact is outsized compared to more urban communities of its size.

**§1.3.2.(A)(2): “Consume less nonrenewable energy as a community in the future than we do today.”** While modern lighting technologies are highly energy efficient, a lower total cost of ownership may promote unnecessary use of light at night. This may undermine or even erase the environmental benefits of modern, energy-efficient lighting. Better outdoor lighting practices that make use of the full range of capabilities of these new technologies naturally lead to lower light consumption and further energy savings without any obvious negative consequences.

**§1.3.2.(A)(3): “Residents and visitors will safely, efficiently, and economically move within our community and throughout the region using alternative modes of transportation.”** One goal of this proposal is to enhance nighttime visibility in Town of Jackson so as to improve public safety. The pursuit of dark skies in Town of Jackson does

not entail accepting compromised safety and security; ‘dark skies’ doesn’t mean ‘dark ground’. Nighttime hazards will be more visible, reducing the risk associated with transit under such conditions.

§1.3.4.(A): “*Ensure standards are consistently applied to similar applications and circumstances.*” Another goal of this proposal is to more precisely delineate the Exterior Lighting and Town of Jackson Sign Standards; add detail to elicit more voluntary compliance with the LDRs; tighten technical definitions to better articulate the intended effects of the LDRs; and provide better outdoor lighting guidance to homeowners, business owners, and public officials.

### **Clear Definitions and Flexibility**

Our proposal strengthens and clarifies uses of string lighting so as to ensure more consistency and predictability of LDR enforcement. The nature of the new standards are aimed at helping developers, property owners, plan reviewers and code enforcement officials better understand the requirements, and to make it easier for them to comply with the requirements of those sections. Our amendments strike a balance between the private property rights of individuals and businesses who want to use string lights with those who do not.

### **Necessity of Addressing Changing Conditions**

As Town of Jackson continues to grow in coming decades, the need to balance development pressures with the purpose and vision of the LDRs in creating consistent community character, preserving a healthy environment, and cultivating a sustainable regional economy drives an equally significant need to reduce light pollution and maintain the area’s dark night skies.

Innovation in lighting design and technology enables addressing this need while ensuring public safety and respecting property rights. The ongoing conversion of existing outdoor lighting stock in Town of Jackson to highly energy-efficient light-emitting diode (LED) technology helps reduce electricity consumption and reduce Town of Jackson’s carbon footprint, but the tendency toward overconsumption of progressively cheaper resources threatens to wipe out these gains.<sup>1</sup> This is especially true with string lighting because it requires no professionals to install, requires no hard wiring, and is an incredibly cost effective way to produce light. String lighting is creating new social and environmental problems through its poor application of light at night relative to the needs of property owners and the community as a whole. Our proposal addresses these concerns and seeks a sensible solution, the goal of which is to improve nighttime visibility in Town of Jackson by targeting and reducing wasted light at night, while at the same time making compliance with exterior lighting standards easier.

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<sup>1</sup> Kyba, C. C. M., et al. (2017). Artificially lit surface of Earth at night increasing in radiance and extent. In *Science Advances* (Vol. 3, Issue 11, p. e1701528). <https://doi.org/10.1126/sciadv.1701528>

## **Improved Implementation of the Comprehensive Plan**

The Comprehensive Plan is clear and direct in its intent to maintain dark night skies as part of preserving ecological aspects of Town of Jackson's community character. Its Policy 1.3.d. directly calls for this:

*The prominence of nature over the built environment should extend beyond daytime viewsheds. The lighting of individual developments cumulatively impacts the ability to see dark and starry night skies. Although illumination is required for public safety, especially along pedestrian corridors, non-essential lighting should be limited, and all lighting will be designed to meet dark skies best practices. Existing development will also be encouraged to implement best practices.*

The amendments in the current proposal further support and strengthen community commitment to realizing the aspirations Policy 1.3.d in particular. By reducing light waste and further lowering light consumption, the proposal also supports the broader Principles of the Comprehensive Plan, including:

- “*Maintain healthy populations of all native species*” (Principle 1.1): Reducing light waste prevents light at night from impinging on nocturnal wildlife habitat and promotes a healthy urban ecology.
- “*Maintain the scenic resources of the community*” (Principle 1.3): Dark night skies are among the signature natural resources of Town of Jackson and Grand Teton National Park region.
- “*Reduce the consumption of non-renewable energy*” (Principle 2.1): Better and more precise application of outdoor light at night will naturally reduce the amount of light needed to get the job done, resulting in decreased electricity consumption.
- “*Increase energy efficiency in buildings*” (Principle 2.4): Similarly, more efficient use of outdoor light at night will reduce energy costs for building owners.
- “*Manage growth predictably and locally*” (Principle 3.3): The proposed amendments further articulate the responsibilities and privileges of property owners under the LDRs. They clarify community expectations to ensure that Town of Jackson can continue to grow and develop without necessarily inflicting environmental harm as a consequence of doing so.
- “*Enhance civic spaces, social functions, and environmental amenities to make [Town of Jackson] a more desirable Complete Neighborhood*” (Principle 4.4): Quality outdoor lighting improves nighttime visibility, enhancing public safety and promoting real security in Town of Jackson. Coupled with the splendor of the region's dark night skies, the result is outdoor spaces in which visitors and residents alike feel safe and secure at night, promoting community wellbeing.

- “*Measure prosperity in natural and economic capital*” (Principle 6.1): Town of Jackson’s natural capital contributes to clean jobs and sustainable tourism that are both good for the community’s bottom line.
- “*Promote a stable and diverse economy*” (Principle 6.2): Increasingly, concern for and attention to dark skies mean rural economic development. One recent estimate put the economic impact from night-sky tourism on the Colorado Plateau alone at \$6 billion and 10,000 jobs in the decade of the 2020s.<sup>2</sup> As tourism is expected to ramp up quickly with the end of the COVID-19 pandemic in sight, the County stands to benefit substantially from a robust ‘astrotourism’ sector.

### **Consistency with Town of Jackson Ordinances**

There are no known inconsistencies with the current proposal and either the LDRs or any other existing County Resolutions.

### **Summary**

Pursuit of the Comprehensive Plan’s Vision, Common Values, and specific policies relating to maintaining dark night skies in the region began more than 20 years ago and continues with the further modernization of the County LDRs through the amendments in the current proposal. Now that Town of Jackson has obtained International Dark Sky Community accreditation it is essential that Town of Jackson work with individual property owners and businesses to ensure that the commitment to maintaining dark night skies becomes a community-wide reality.

In summary, approving this amendment:

- **Forwards the objectives of the LDRs and Comprehensive Plan;**
- **Maintains the consistency among provisions of the LDRs;**
- **Provides flexibility for landowners within standards that clearly define desired character;**
- **Is necessary to address changing conditions brought on by the rapid adoption of LED lighting technology and the emerging market for Electronic Message Centers, especially with string lighting;**
- **Improves implementation of the Comprehensive Plan by adhering more closely to lighting design best practices;**
- **Is consistent with other adopted County Resolutions; and**

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<sup>2</sup> Mitchell, D. and Gallaway, T. (2019), "Dark sky tourism: economic impacts on the Colorado Plateau Economy, USA", *Tourism Review*, Vol. 74 No. 4, pp. 930-942. <https://doi.org/10.1108/TR-10-2018-0146>

- Meets core outdoor lighting policy requirements for International Dark Sky Community accreditation.