

Regular Town Council Meeting

August 3, 2026

6:00 PM

Town Council Chambers

Chair: Arne Jorgensen

NOTICE: THE VIDEO AND AUDIO FOR THIS MEETING ARE STREAMED TO THE PUBLIC VIA THE INTERNET AND MOBILE DEVICES WITH VIEWS THAT ENCOMPASS ALL AREAS, PARTICIPANTS AND AUDIENCE MEMBERS. PLEASE SILENCE ALL ELECTRONIC DEVICES DURING THE MEETING.

I. ZOOM LINK FOR PUBLIC PARTICIPATION

The Town reserves the right to close Public Comment via Zoom at any time. In-person comment will continue to be taken and written comments can always be submitted to Town Council by emailing electedofficials@jacksonwy.gov.

- A. To join, click link or copy it to your browser: <https://us02web.zoom.us/j/85293352171?pwd=2xibVtKKhsPuB0UHPwvN1Dcfabp5K6.1>
Or join at zoom.com with Webinar ID: **852 9335 2171** Passcode: **83001** or by phone: **+1 719 359 4580**

II. OPENING

- A. Call to Order and Roll Call
- B. Pledge of Allegiance
- C. Land Acknowledgement
- D. Announcements/Proclamations
 - 1. Proclamation Honoring Special Olympic Athlete

III. PUBLIC COMMENT

This section is reserved for public comment about items not included in this agenda. Public comment is limited to 3 minutes. As a general practice, Council does not discuss, debate, or act on issues raised under public comment. Council may or may not discuss an issue raised under Public Comment later in the meeting during Matters from Mayor and Council at their discretion. If you would like to communicate with Council during the meeting about an item on the agenda, please wait until public comment has been called for that item. Public comment may also be submitted to Council at any time by emailing electedofficials@jacksonwy.gov.

IV. CONSENT CALENDAR

All matters listed in this section are considered to be of routine nature by the governing body and will be enacted in one motion, unless it is removed from the consent calendar and considered separately by Council. Public comment may be given on any item.

- A. Meeting Minutes
 - 1. July 20, 2026 Regular Town Council Workshop
 - 2. July 20, 2026 Regular Town Council Meeting
- B. Disbursements
- C. Contracts
 - 1. Amendment & Restatement Workforce Ownership Deed Restriction 440 W. Kelly No. 12
 - 2. Letter Agreement with Teton Conservation District
- D. Updates to Drug and Alcohol Policy Addendums (Roxanne Robinson)

Please note that at any point during the meeting, the Mayor may change the order of items listed on this agenda. In order to ensure that you are present at the time your item of interest is discussed, please join the meeting at the beginning to hear any changes to the schedule or agenda.

- E. Sewer Services & Connection Request – South Park Landing RV Dump Station (E26-0136) (Brian Lenz)
- F. Parks & Recreation Joint Power Agreement Update (Tyler Sinclair)

V. PUBLIC HEARINGS, DISCUSSION AND/OR POSSIBLE ACTION ITEMS

- A. Planning and Building
 - 1. Demolition Permit Stay Request for 700 E. Pearl Avenue (DEM26-0012) (Paul Anthony, 15 mins)
 - 2. Amendments to Contractor Licensing Requirements (Paul Anthony & Kelly Sluder, 45 mins)
 - 3. Conditional Use Permit for Outfitter/Tour Operator use at 250 N. Cache St (P25-163) (Katelyn Page, 20 mins)
 - 4. Rodeo Grounds Stealth Wireless Facility Conditional Use Permit (Andrew Bowen, 5 mins)
- B. Public Works
 - 1. Future Wastewater Treatment Plant Capacity Analysis (Johnny Ziem, 60 mins)

VI. RESOLUTIONS

- A. Amendments to Policy Manuals
 - 1. Resolution 26-15: A Resolution Adopting Amendments to the Policy Manual for General Employees (Roxanne Robinson)
 - 2. Resolution 26-16: A Resolution Adopting Amendments to the Policy Manual for Transit Related Employees (Roxanne Robinson)
 - 3. Resolution 26-17: A Resolution Adopting Amendments to the Policy Manual for Victim Services Employees (Roxanne Robinson)

VII. ORDINANCES

- A. Ordinance F: An Ordinance Amending Contractor Licensing Requirements (PM26-0018) (Kelly Sluder & Lea Colasuonno)

VIII. MATTERS FROM MAYOR AND COUNCIL

- A. Board and Commission Reports
- B. Subscriptions, Training, Travel, & Meetings (Susan Scarlata)

IX. MATTERS FROM THE TOWN MANAGER

- A. Town Manager's Report

X. EXECUTIVE SESSION

Adjourn to executive session to consider matters concerning litigation to which the governing body is a party or proposed litigation to which the governing body may be a party in accordance with Wyoming Statute 16-4-405(a)(iii).

Please note that at any point during the meeting, the Mayor may change the order of items listed on this agenda. In order to ensure that you are present at the time your item of interest is discussed, please join the meeting at the beginning to hear any changes to the schedule or agenda.



TOWN OF JACKSON

Pledge of Allegiance

I pledge allegiance to the flag of the United States of America,
and to the Republic for which it stands, one Nation under God,
indivisible, with liberty and justice for all.



TOWN OF JACKSON

Land Acknowledgement

We recognize that the land we are gathering on is the ancestral homeland of the Mountain Shoshone People who stewarded it for thousands of years and that many other tribes also lived upon and cared for this area including the Bannock, Blackfoot, Crow, Eastern Shoshone, Gros Ventre, Nez Perce, Northern Arapaho tribes, and others. With gratitude, we honor Indigenous Peoples, past and present. We also acknowledge the sovereignty of the Native nations closest to Jackson whose land was taken through broken treaties that resulted in the creation of the Wind River and Fort Hall Indian Reservations. We recognize this acknowledgement is simply a first step. The Town of Jackson is committed to continued and informed action to connect with indigenous people.

PROCLAMATION HONORING SPECIAL OLYMPIAN

WHEREAS, from June 20-26, 2026, the Special Olympics USA Games took place in Minnesota uniting 3,000 athletes, 1,500 coaches, 10,000 volunteers, and 75,000 fans from all 50 states; and

WHEREAS, athlete Jonah Baltes from Teton County competes in bocce and was invited by Special Olympics Wyoming to be a part of our state’s delegation; and

WHEREAS, Baltes was the only special Olympian from Teton County and competing in various bocce events; and

WHEREAS, Jonah Baltes won a Gold medal in mixed doubles bocce, placed 5th in men’s singles, and his team placed 4th in bocce overall; and

WHEREAS, Baltes clearly embodies the Special Olympics oath, “Let me win. But if I cannot win, let me be brave in the attempt;” and

WHEREAS, Jackson is proud to have this amazing athlete represent our community on the national stage; and

NOW THEREFORE, I, Arne Jorgensen, Mayor of the Town of Jackson, on behalf of the Jackson Town Council, honor local athlete Jonah Baltes for his incredible accomplishments on and off the bocce court and wish him much success in his future adventures.

DATED THIS 3rd DAY OF AUGUST 2026.

TOWN OF JACKSON

Arne O. Jorgensen, Mayor

ATTEST:

Marisa Watsabaugh, Town Clerk

TOWN COUNCIL PROCEEDINGS – UNAPPROVED

July 20, 2026

JACKSON, WYOMING

The Jackson Town Council met in regular workshop in the Town Hall Council Chambers, located at 150 East Pearl in Jackson, at 1:30 P.M. This meeting was held in-person and through the Zoom platform. Upon roll call the following were found to be present:

TOWN COUNCIL: Mayor Arne Jorgensen, Devon Viehman, Kevin Regan, and Alyson Sperry. Jonathan Schechter joined at 1:31 pm.

STAFF: Tyler Sinclair, David Garcia, Lea Colasuonno, Johnny Ziem, Michelle Weber, Tanya Anderson, Audrey Jones, Matteo Morello Marisa Watsabaugh, Susan Scarlata, Thea Farrell, Paul Anthony, Kelly Sluder, Brian Schilling, Tyler Florence, Russ Ruschill, Andy Erskine, Charlotte Frei and Lynsey Lenamond.

Sustainability Plan Progress Report. Tanya Anderson made staff comment. Council held discussion with staff. Megan Jennings, Shannon Shuptrine, Dr. Elizabeth Lynch, and Mary Lynn Callahan made public comment. A motion was made by Devon Viehman and seconded by Kevin Regan to direct staff to work on the Sustainability Plan strategies as proposed in this staff report, including continuation of strategies that are in progress or being planned, and to start working on the following strategies:

1. Research options for centralized delivery hubs.
2. Support local and regional production of renewable energy.
3. Research land sequestration potential through vegetative management practices.

Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

Potential Pollinator Protection Initiatives. Tanya Anderson, Audrey Jones and Andy Erskine made staff comment. Council held discussion with staff. Dr. Elizabeth Lynch made comment on behalf of Pollinator Pathways of the Tetons and Lorna Miller made public comment. A motion was made by Devon Viehman and seconded by Alyson Sperry to:

1. Model pollinator-supporting practices on Town property and launch community education efforts through informational signage and events.
2. Leverage partnerships with community organizations already working on pollinator protection.
3. Pursue a Bee City USA certification.
4. Work with the Planning Department to incorporate pollinator garden requirements on new buildings downtown.

Council recessed at 2:34 pm and reconvened at 2:41 pm.

The motion was withdrawn.

A motion was made by Kevin Regan and seconded by Devon Viehman to:

1. Model pollinator-supporting practices on Town property and launch community education efforts through informational signage and events.
2. Leverage partnerships with community organizations already working on pollinator protection.
3. Pursue a Bee City USA certification.
4. Work with the Planning Director to explore adding pollinator gardens and native plants requirements to new building projects in the downtown.

Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

Council recessed at 2:50 pm and reconvened at 2:57 pm.

Overview of Draft Community Streets Plan and Draft Transportation Engineering Design Manual. Brian Schilling and Tyler Sinclair made staff comment. Council held discussion with staff. Sam Petri and Mary Lynn Callahan made public comment. A motion was made by Devon Viehman and seconded by Jonathan Schechter to direct staff to return with a Community Streets Plan and Transportation Engineering Design Manual as presented and discussed today for consideration at a future Regular Council meeting subject to minor changes by staff including revising the language for a neighborhood bikeway. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

Matters from Mayor and Council. Board and Commission Reports & Meeting Check-In. Council discussed tentative upcoming meetings.

Council Working Calendar. Tyler Sinclair reviewed Council’s Working Calendar. Council held discussion with staff.

Adjourn. A motion was made by Jonathan Schechter and seconded by Kevin Regan to adjourn. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried. The workshop adjourned at 4:29 p.m.

TOWN OF JACKSON

ATTEST:

Arne O. Jorgensen, Mayor

Lynsey Lenamond, Deputy Town Clerk

Minutes: II Publish JH News & Guide: July 29, 2026

TOWN COUNCIL PROCEEDINGS - UNAPPROVED

July 20, 2026

JACKSON, WYOMING

The Jackson Town Council met in regular session in the Town Hall Council Chambers located at 150 East Pearl in Jackson, at 6:00 P.M. This meeting was held in-person and through the Zoom platform. Upon roll call the following were found to be present:

TOWN COUNCIL: Mayor Arne Jorgensen, Jonathan Schechter, Devon Viehman, Kevin Regan, and Alyson Sperry.

STAFF: Tyler Sinclair, David Garcia, Lea Colasuonno, Johnny Ziem, Paul Anthony, Michelle Weber, Tanya Anderson, Susan Scarlata, Ryan Hostetter, Katelyn Page, Marisa Watsabaugh, Andrew Bowen, Roxanne Robinson, Kelly Thompson, Brian Lenz and Lynsey Lenamond.

The Pledge of Allegiance was led by Mayor Jorgensen. The Land Acknowledgement was read by Mayor Jorgensen. Mayor Jorgensen read a proclamation for National Disability Independence Day and introduced Marisa Neckels Watsabaugh, Town Clerk.

Public Comment. Erin Freer made public comment.

Consent Calendar. A motion was made by Devon Viehman and seconded by Jonathan Schechter to approve the consent calendar including items A-D as presented with the following motions:

A. **Meeting Minutes.** To approve minutes from the July 6, 2026 Regular Meeting.

B. **Disbursements.** To approve the disbursements as presented. 842-NCPERS GROUP WYOMING \$64.00; A & I DISTRIBUTORS \$101.44; ACE HARDWARE \$7,678.96; AFLAC \$1,515.48; AMAZON \$3,674.65; AMERICAN PUBLIC WORKS ASSOC \$2,209.00; AMERI-TECH EQUIPMENT CO INC. \$24,152.52; APPLE INC \$864.00; AT&T \$319.19; AXON ENTERPRISES, INC \$369,527.27; BEST BEST & KRIEGER \$1,141.00; BIG R RANCH & HOME \$167.26; BISON LUMBER \$26.78; BLACK WIDOW WELDING INC \$585.00; BLUE SPRUCE CLEANERS, INC \$223.40; BLUEBEAM, INC \$2,850.00; BOLAND, ANITA \$4,657.70; BOYD, JOSEPH \$175.00; BURKHOLDER, SHAWN \$4,283.22; CLEARGOV INC \$20,188.00; CNA SURETY \$1,047.50; COLORADO ASSOCIATION OF SKI TOWNS \$800.00; CONRAD & BISCHOFF INC. \$34,023.74; CONTROL SYSTEM TECHNOLOGY, INC. \$19,616.50; COOMBS, CAROLINE KAUSLICK \$3,200.00; CORE & MAIN LP \$1,965.90; DARKTRACE HOLDINGS LIMITED \$86,632.00; DEAN'S PEST CONTROL LLC \$270.00; DELTA DENTAL PLAN OF WYOMING \$7,300.64; DEX IMAGING \$147.19; DIVISION OF CHILD SUPPORT ENFORCEMENT \$509.23; DYNAMIC CONTROLS, LLC \$1,769.00; E.R. OFFICE EXPRESS \$19.89; EDA LAND PLANNING \$467.50; EMPLOYERS COUNCIL SERVICES, INC. \$8,350.00; ENERGY LABORATORIES INC. \$2,828.00; ETNA TRADE PARK LLC \$8,124.00; EVIDENT \$599.00; FALL RIVER PROPANE \$675.00; FERGUSON ENTERPRISES, INC \$43.19; GANNETT PEAK SURVEYING, LLC \$4,200.00; GEDDES, GLENN \$150.00; GM SHEET METAL LLC \$123.50; GRAINGER \$762.51; GRANICUS, LLC \$22,762.51; GRAVITY GRAPHICS \$820.00; GRIFFITH PARTNERSHIP LLC \$3,520.00; HALPIN, MICHAEL \$15.00; HD FOWLER COMPANY \$780.60; HERITAGE LANDSCAPE SUPPLY GROUP INC \$1,186.23; HIGH COUNTRY LINEN \$3,350.56; HIRST APPLGATE, LLP \$322.50; HOLE FOOD RESCUE \$6,250.00; HOYT ARCHITECTS LLC \$4,600.96; HUNT CONSTRUCTION INC \$33,999.75; IDAHO STATE TAX COMMISSION \$7,424.00; IMMIGRANT HOPE \$2,000.00; INTERSTATE BATTERY \$1,990.45; IPRO TECH, LLC \$7,998.71; IVY OUTDOOR SERVICES LLC \$21,409.20; JACKSON GROUP LOCKBOX \$3,697.82; JACKSON HOLE COMMUNITY RADIO \$2,200.00; JACKSON HOLE FORD \$465.00; JACKSON HOLE HISTORICAL SOCIETY \$225.00; JACKSON HOLE HOSPITALITY GROUP, LLC \$2,000.00; JACKSON HOLE NEWS & GUIDE \$8,779.79; JACKSON HOLE ROASTERS \$576.00; JACKSON LUMBER INC \$58.65; JAMAR TECHNOLOGIES, INC \$2,002.00; JAMF SOFTWARE, LLC \$8,007.00; JAVGUREANU, AUREL \$1,500.00; JET LINE SALES & SERVICE, LLC \$9,801.00; JORGENSEN ASSOCIATES, PC \$28,283.27; KGB PRODUCTIONS \$9,800.00; KJ'S SERVICES INVESTMENTS LLC \$6,244.00; KOIS BROTHERS EQUIPMENT COMPANY \$733.70; KRAMER, KENTON \$3,299.31; LANCASTER, JUSTIN \$170.00; LEADERSHIP WYOMING \$4,200.00; LEPCO \$240.50; LOWER VALLEY ENERGY INC \$54,708.75; MACY'S SERVICES \$150.00; MASON, TOM \$155.00; MASTERCARE CLEANING JH, LLC \$1,202.00; MERIDIAN ENGINEERING P.C. \$7,322.50; MOUNTAIN STATES LIGHTING \$7,600.00; MSC INDUSTRIAL SUPPLY CO \$345.73; NAPA AUTO PARTS INC. \$1,117.05; NATIONAL MUSEUM OF WILDLIFE \$1,400.00; NAVIGATE, LLC \$9,678.75; NELSON ENGINEERING \$63,360.10; NOREGON SYSTEMS INC. \$1,157.04; OPS STRATEGIES, LLC \$9,975.00; OUTBACK LANDSCAPE OF WYOMING, LLC \$526.00; PEAK WATER SERVICES, LLC \$9,446.27; PEERY, JEREMIAH \$135.00; PREMIER CLEANING SERVICES LLC \$3,870.00; PREMIER TRUCK- SALT LAKE CITY \$912.46; R & A SAFETY LLC \$1,095.50; RAD CURBSIDE, LLC \$123.00; RADARSIGN LLC \$750.00; RAFTER J IMPROV/SERV DIST \$63.60; RAMANATHAN, BRINDA \$5,000.00; REGAN, KEVIN \$144.00; RENDEZVOUS ENGINEERING, P.C. \$22,885.75; RENDEZVOUS INSURANCE INC. \$159,921.25; RICH, SAMUEL \$597.40; RIDGELINE EXCAVATION INC \$45,470.50; RINK-TEC INTERNATIONAL, INC \$16,983.95; RT1 INC \$23.68; SAFETY SUPPLY & SIGN CO., INC. \$537.80; SCHWARTZ, ANDY \$5,000.00; SHAW CONSTRUCTION OF WYOMING, LLC \$177,928.53; SHERWIN-WILLIAMS CO. \$1,891.30; SHIPP, HARRISON \$333.15; SILVERSTAR \$0.68; SMITH POWER PRODUCTS, INC. \$2,579.10; SOSA'S JANITORIAL SERVICE \$7,987.50; SPACE EXPLORATION TECHNOLOGIES CORP \$785.00; SPEEDY CPS, LLC \$75.86; SPRING CREEK ANIMAL HOSPITAL \$37.91; SPSC POA - SOUTH PARK SERVICES CTR POA \$303.82; STATE FIRE IDAHO \$1,800.00; STEPHENS, SHAWN \$3,192.98; STONE'S TOWN AND COUNTRY MOTORS, INC. \$737.08; SUMMIT SAFETY LLC \$2,871.54; SUNRISE ENVIRONMENTAL \$438.31; SUPOWIT, DEBORAH \$160.00; SWICEGOOD, WYATT \$616.00; TETON COUNTY HOUSING AUTHORITY \$1,957.00; TETON COUNTY INTEGRATED SOLID WASTE/RECY \$717.00; TETON COUNTY-FUND 10 \$935,611.46; TETON RENTAL CENTER \$46.60; TETON ROPE ACCESS AND SERVICES, LLC \$7,081.50; TETON SCIENCE SCHOOL, INC \$3,903.50; TETON TRASH REMOVAL, INC. \$120.00; TETON YOUTH & FAMILY SERVICES \$104,121.75; THE AFTERMARKET PARTS COMPANY, LLC \$2,476.66; THE ARTCRAFT GROUP, INC \$2,463.30; THOMSON WEST \$1,245.48; THURSTON APPLIANCES \$1,009.00; TK ELEVATOR CORP. \$895.56; T-MOBILE \$63.70; TMSC LLC \$2,130.00; TORONTO, MICHAEL \$114.00; TREFONAS LAW, P.C. \$964.65; US POSTAL SERVICE \$312.00; VALLEY BOOKSTORE 3039 \$194.40; VALOR ROOT CONTROL, LLC \$4,950.00; VIRGINIAN VILLAGE CONDO HOA \$1,350.00; VOICES JACKSON HOLE \$7,285.00; W.A.R.M. PROPERTY INSURANCE \$369,894.07; WAM \$225.00; WBC PROPERTIES \$4,300.00; WESGLASS INC. \$180.62; WILSON, JOHN \$4,800.00; WIND RIVER TRIBAL BUFFALO INITIATIVE \$6,000.00; WY CHILD SUPPORT ENFORCEMENT \$452.30; WY WORKERS' SAFETY & COMP \$11,862.65; WYOMING CONF OF BLDG OFFICIALS \$150.00; WYOMING DEPARTMENT OF EMPLOYMENT \$4,112.46; WYOMING DEPARTMENT OF TRANSPORTATION \$242.70; WYOMING DEPARTMENT OF TRANSPORTATION \$185.78; WYOMING LAW ENFORCEMENT ACADEMY \$180.00; WYOMING RETIREMENT SYSTEM \$215,875.09; WYOMING.COM INC \$5.00; YELLOW IRON WASTE, LLC \$2,887.00

C. June Municipal Court Report. To accept the June Municipal Court Report into record.

D. Partial Vacation without Replat at 910 Smith Lane and 915 Simon Lane – S4 Flats (P26-113). To acknowledge the partial vacation without replat of the common lot line between Lot 25 and Lot 36 of the Jackson Hole Meadows Addition to the Town of Jackson subject to the Town LDRs, the departmental reviews, minor changes by staff, and this staff report dated July 20, 2026.

There was no public comment on the consent calendar. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

Development Plan for the Virginian Lodge Apartments at 750 West Broadway Ave (P265-210). Andrew Bowen and Paul Anthony made staff comment. Hal Hutchinson made comment on behalf of the applicant. Council held discussion with staff. There was no public comment. A motion was made by Devon Viehman and seconded by Alyson Sperry to approve Development Plan P25-210 for the Virginian Lodge Apartments, consisting of 32 units, located at 750 West Broadway Avenue, based upon the findings and conditions presented in the staff report, the departmental reviews, and subject to the staff report dated July 20, 2026. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

Land Development Regulations Text Amendment for the Natural Resource Overlay and Water Body Setbacks (PM26-0005-PM26-0009). Ryan Hostetter, Paul Anthony, and Lea Colasuonno made staff comment. Megan Smith spoke on behalf of EcoConnect Consulting. Council held discussion with staff. Jen Evans, Amy Kuchak, and Lorna Miller made public comment.

A motion was made by Devon Viehman and seconded by Kevin Regan to approve Zoning Map Amendment PM26-0005 to update the Natural Resources Overlay to a Tiered Natural Resources Overlay, as presented in the staff report dated July 20, 2026, including any changes discussed by the Council during the hearing. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

A motion was made by Kevin Regan and seconded by Devon Viehman to approve Text Amendment PM26-0006 to update the NRO standards in Section 5.2.1 and the assessment process in Section 8.2.2, as presented in the staff report dated July 20, 2026, including any changes discussed by the Council during the hearing. Jonathan Schechter proposed a friendly amendment to remove the exemption for affordable housing and ARUs. The friendly amendment was not accepted, and it failed. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

A motion was made by Devon Viehman and seconded by Kevin Regan to approve Text Amendment PM26-0007 to update Waterbody and Wetland Buffer standards in Section 5.1.1., as presented in the staff report dated July 20, 2026, including any changes discussed by the Council during the hearing. Jonathan Schechter proposed a friendly amendment to include ongoing conversations about waterbody and wetland buffer standards. The friendly amendment was not accepted, and it failed. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

A motion was made by Devon Viehman and seconded by Kevin Regan to approve Text Amendment PM26-0009 to add new standards for retaining walls in Section 5.1.7, as presented in the staff report dated July 20, 2026, including any changes discussed by the Council during the hearing. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

A motion was made by Devon Viehman and seconded by Alyson Sperry to approve Text Amendment PM26-0008 related to wildlife friendly fencing in Section 5.1.2, as presented in the staff report dated July 20, 2026, including any changes discussed by the Council during the hearing. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

Council recessed at 7:55 pm and reconvened at 8:04 pm.

Matters from Mayor and Council. Lynsey Lenamond made staff comment. Mayor Jorgensen nominated Laura Bonich and Steph Wise to the Planning Commission/Board of Adjustment for three-year terms, beginning August 1, 2026 and expiring July 31, 2029. A motion was made by Alyson Sperry and seconded by Devon Viehman to consent to the reappointment of Laura Bonich and Steph Wise to the Planning Commission/Board of Adjustment for three-year terms, beginning August 1, 2026 and

expiring July 31, 2029. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried. Mayor Jorgensen reappointed Laura Bonich and Steph Wise to the Planning Commission/Board of Adjustment for three-year terms, beginning August 1, 2026 and expiring July 31, 2029. Lea Colasuonno made staff comment. A motion was made by Kevin Regan and seconded by Devon Viehman to reappoint Kasey Mateosky, Katie Wilson, and Tyson Slater to the Board of Examiners for two-year terms ending July 31, 2028. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried. A motion was made by Devon Viehman and seconded by Jonathan Schechter to direct the Town Manager or their designee to draft a brief scoping report about Affordable Housing exemptions to be added to an agenda within 60 days. There was no public comment. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried. Paul Anthony made staff comment about a demolition permit at 700 E. Pearl Avenue. Council asked that the item be added to the August 3 Regular Town Council meeting agenda. Council discussed 90 Virginian Lane.

Town Manager’s Report. Tyler Sinclair made staff comment. The Town Manager’s report contained requests for approval of temporary sign permits for Climb Wyoming at 105 Buffalo Way from July 26-August 1, 2026 and Teton Gravity Research at 105 Buffalo Way from September 5-19, 2026, updates on communications to Health and Human Service Organizations and the Wind River Tribal Buffalo Initiative. A motion was made by Devon Viehman and seconded by Kevin Regan to approve the Town Manager’s Report. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried.

Adjourn. A motion was made by Jonathan Schechter and seconded by Kevin Regan to adjourn. Mayor Jorgensen called for the vote. The vote showed all in favor. The motion carried. The meeting adjourned at 8:45 p.m.

TOWN OF JACKSON

ATTEST:

Arne O. Jorgensen, Mayor

Lynsey Lenamond, Deputy Town Clerk

Minutes: II Publish JH News & Guide: July 29, 2026

Report Criteria:

Detail report.

Invoices with totals above \$0 included.

Paid and unpaid invoices included.

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
328	842-NCPERS GROUP WYOMIN	842082026	PAYROLL DEDUCTIONS	07/01/2026	32.00	.00	
Total 328:					32.00	.00	
7609	954 CONSULTANTS	SIN0000854	ANTENNA	07/15/2026	2,326.88	.00	
7609	954 CONSULTANTS	SIN000741	BROTHER PRINTER, DOCKING STATI	05/13/2026	5,412.38	.00	
7609	954 CONSULTANTS	SIN000750	PEPLINK WAN PORTS, MODULES, AN	05/26/2026	59,273.15	.00	
7609	954 CONSULTANTS	SIN000790	PEPLINK MINI	06/05/2026	3,333.53	.00	
Total 7609:					70,345.94	.00	
51	ACE HARDWARE	946030	KINK FREE HOSES	06/01/2026	61.98	.00	
51	ACE HARDWARE	946326	METAL CUTOFF DSC	06/03/2026	15.47	.00	
51	ACE HARDWARE	948170	LOCKS	06/18/2026	596.87	.00	
51	ACE HARDWARE	948196	LOCK PLATE	06/18/2026	83.93	.00	
51	ACE HARDWARE	949115	DISHWASHER DETER	06/26/2026	11.99	.00	
51	ACE HARDWARE	949320	TELESCOPE POLE AND LONG HANDL	06/29/2026	51.98	.00	
51	ACE HARDWARE	949433	CAULK	06/29/2026	12.99	.00	
51	ACE HARDWARE	950365	HEX BOLTS	07/08/2026	4.78	.00	
51	ACE HARDWARE	950437	LOCK PLATES	07/08/2026	59.96	.00	
51	ACE HARDWARE	950530	CORD RANGE 6	07/09/2026	66.98	.00	
51	ACE HARDWARE	950579	KILLER WEED	07/09/2026	34.99	.00	
51	ACE HARDWARE	950639	GAS CAN NOSPILL	07/06/2026	55.93	.00	
51	ACE HARDWARE	950647	Tools	07/06/2026	114.96	.00	
51	ACE HARDWARE	950795	HEX SELF	07/11/2026	2.39	.00	
51	ACE HARDWARE	951013	blower	07/14/1956	329.99	.00	
51	ACE HARDWARE	951132	SCREWS	07/14/2026	1.70	.00	
51	ACE HARDWARE	951191	SHOCKWAVE STEP BIT	07/15/2026	64.99	.00	
51	ACE HARDWARE	951260	BULBS	07/15/2026	31.98-	.00	
51	ACE HARDWARE	951292	FLANGE BOLT & SCREWS	07/16/2026	3.74	.00	
51	ACE HARDWARE	951295	ACETONE & PAINT	07/16/2026	23.98	.00	
51	ACE HARDWARE	951335	SPRAY BOTTLE	07/16/2026	9.99	.00	
51	ACE HARDWARE	951375	LADDER & GARDEN HOSE	07/16/2026	299.97	.00	
51	ACE HARDWARE	951384	RINGS & PLIERS	07/16/2026	51.63	.00	
51	ACE HARDWARE	951385	TRIM ROLLER, PAIL LID, PAINT ROLLE	07/16/2026	39.21	.00	
51	ACE HARDWARE	951509	SABER TORX	07/17/2026	44.99	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 51:					2,013.41	.00	
2269	AFLAC	634353	ACCOUNT #y9599	07/25/2026	1,578.51	1,578.51	08/03/2026
Total 2269:					1,578.51	1,578.51	
88	AIRGAS INTERMOUNTAIN INC.	9173466400	INM, OXYGEN & ACETYLENE	07/02/2026	470.44	.00	
Total 88:					470.44	.00	
5726	AMAZON	1HETT-RLJP-1	AMAZON BASIC 48 PACK AA BATTERI	07/13/2026	48.54	.00	
5726	AMAZON	1KF3-FWLV-G	WELING 34 INCH COMPUTER PRIVAC	07/14/2026	56.03	.00	
5726	AMAZON	1MTY-C9V6-D	HOLE SAW, TRAILER HITCH RECEIVE	07/17/2026	260.63	.00	
5726	AMAZON	1NWH-XXMF-	ECOLIPAK 75 PACK CLAMSHELL TAKE	07/14/2026	20.99	.00	
5726	AMAZON	1NXR-RDPG-G	PROMOT NOTARY STAMP	07/09/2026	16.65	.00	
5726	AMAZON	1PW1-DXP6-G	18V BATTERY	07/16/2026	120.00	.00	
5726	AMAZON	1QHP-7MKG-L	battery compatable with sigmas	07/06/2026	267.84	.00	
5726	AMAZON	1RV6-1KPF-Y1	PENS, FLOOR LAMP	07/20/2026	16.92	.00	
5726	AMAZON	1RV6-1KPF-Y1	PENS, FLOOR LAMP	07/20/2026	62.00	.00	
5726	AMAZON	1RWG-TFHC-X	BROCHURE MOUNT	07/14/2026	13.49	.00	
5726	AMAZON	1TT7-X3VF-Q	SHIRTS & NAMETAGS	07/20/2026	63.44	.00	
5726	AMAZON	1V33-JPXX-KP	SHOP CHAIR	07/15/2026	451.25	.00	
5726	AMAZON	1VT7-Q7N7-XY	100 PIECES OF BLACK CARDS	07/08/2026	175.34	.00	
5726	AMAZON	1WDG-6TXF-7	DIESEL LAPTOPS	07/15/2026	1,480.06	.00	
Total 5726:					3,053.18	.00	
6214	AMERICAN TOWER CORPORAT	5320466	SNOW KING TOWER LEASE	07/01/2026	9,420.79	.00	
Total 6214:					9,420.79	.00	
2763	AMERIWEST WATER SERVICES	26-113	AMERIGUARD 935	07/01/2026	51,637.00	.00	
Total 2763:					51,637.00	.00	
7461	BLACK WIDOW WELDING INC	1431	WELDING	07/17/2026	2,974.50	.00	
7461	BLACK WIDOW WELDING INC	1431	WELDING	07/17/2026	4,303.00	.00	
Total 7461:					7,277.50	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
6727	BRIGGS, ERIC L	44589	3MA362111	07/16/2026	356.93	.00	
Total 6727:					356.93	.00	
5322	CHARGEPOINT, INC	IN427293	CPF25CORD	07/09/2026	243.25	.00	
Total 5322:					243.25	.00	
5967	CITY OF DRIGGS	BBSTART2026	BUS BARN RENT JULY 2026	07/13/2026	1,278.00	.00	
5967	CITY OF DRIGGS	BBSTART2026	ELECTRIC JUNE 2026	07/13/2026	151.85	.00	
5967	CITY OF DRIGGS	BBSTART2026	SEWER/WATER/CLEANING	07/13/2026	202.97	.00	
Total 5967:					1,632.82	.00	
514	CONRAD & BISCHOFF INC.	IN-280428-26	RIDGELINE DEF	07/07/2026	462.47	.00	
Total 514:					462.47	.00	
4887	CONTROL SYSTEM TECHNOLO	11864	CONTROLS TESTING & HARDWARE	07/20/2026	11,611.00	.00	
Total 4887:					11,611.00	.00	
1691	CORE & MAIN LP	V000049257	GASKET	06/29/2026	7,505.79	.00	
1691	CORE & MAIN LP	V000049272	GASKET,NEOPRENE	06/26/2026	11,919.50	.00	
1691	CORE & MAIN LP	V000049624	SNUB ANTENNA	06/30/2026	4,713.80	.00	
Total 1691:					24,139.09	.00	
611	CUMMINS SALES AND SERVICE	40-260720212	INSITE LITE	07/13/2026	1,600.00	.00	
Total 611:					1,600.00	.00	
148	DELL	10884042502	VLA ACROBAT & CREATIVE CLOUD	07/20/2026	17,602.69	.00	
Total 148:					17,602.69	.00	
6883	DIVISION OF CHILD SUPPORT	07242026	DCSE CASE #0005405448	07/24/2026	509.23	509.23	07/24/2026
Total 6883:					509.23	509.23	
2934	DLT SOLUTIONS, INC.	SI742277	Architecutre Engineering Construction	07/22/2026	9,096.10	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 2934:					9,096.10	.00	
3408	E.R. OFFICE EXPRESS	23985	PAPER	07/18/2026	74.69	.00	
Total 3408:					74.69	.00	
7446	ELAN ONE CARD	06302026	UNITED CHIEF 0494	06/30/2026	884.28	884.28	07/14/2026
7446	ELAN ONE CARD	06302026	AMAZON COMM DEV 3840	06/30/2026	14.97	14.97	07/14/2026
7446	ELAN ONE CARD	06302026	EVIDENT DETECTIVE SGT 6677	06/30/2026	60.00	60.00	07/14/2026
7446	ELAN ONE CARD	06302026	WHIRLPOOL FACILITIES PW 4135	06/30/2026	187.64	187.64	07/14/2026
7446	ELAN ONE CARD	06302026	STARLINK IT 7309	06/30/2026	660.00	660.00	07/14/2026
7446	ELAN ONE CARD	06302026	DISH NETWORK IT 7309	06/30/2026	157.20	157.20	07/14/2026
7446	ELAN ONE CARD	06302026	CONOCO START ADMIN 9251	06/30/2026	36.62	36.62	07/14/2026
7446	ELAN ONE CARD	06302026	DAMAGE INSURANCE START OPER 4	06/30/2026	84.74	84.74	07/14/2026
7446	ELAN ONE CARD	06302026	HILTON GARDEN INN TOWN COUNCIL	06/30/2026	650.61	650.61	07/14/2026
7446	ELAN ONE CARD	06302026	VERBLING VICTIM SERVICES 1944	06/30/2026	25.92	25.92	07/14/2026
7446	ELAN ONE CARD	06302026	ALBERTSONS WWTP 2901	06/30/2026	39.38	39.38	07/14/2026
7446	ELAN ONE CARD	06302026	VIRGINIAN LODGE LIEUTENANT 7867	06/30/2026	176.54	176.54	07/14/2026
7446	ELAN ONE CARD	06302026	PICNIC PERSONNEL 7099	06/30/2026	50.00	50.00	07/14/2026
7446	ELAN ONE CARD	06302026	CHECKR PERSONNEL 7099	06/30/2026	74.99	74.99	07/14/2026
7446	ELAN ONE CARD	06302026	STAPLES PERSONNEL 7099	06/30/2026	29.95	29.95	07/14/2026
7446	ELAN ONE CARD	06302026	PEARL ST BAGESL PLANNING 5582	06/30/2026	33.63	33.63	07/14/2026
7446	ELAN ONE CARD	06302026	MONARCH POWERSPORTS PW FLEE	06/30/2026	225.00	225.00	07/14/2026
7446	ELAN ONE CARD	06302026	MANDALAY BAY IT 7309	06/30/2026	268.20	268.20	07/14/2026
7446	ELAN ONE CARD	06302026	MANDALAY BAY IT 7309	06/30/2026	2,209.22	2,209.22	07/14/2026
7446	ELAN ONE CARD	06302026	STARLINK IT 7309	06/30/2026	20.30	20.30	07/14/2026
7446	ELAN ONE CARD	06302026	TARGET JPD SGT 2280	06/30/2026	85.59	85.59	07/14/2026
7446	ELAN ONE CARD	06302026	CHEVRON JPD TRAINING TWO 6481	06/30/2026	59.66	59.66	07/14/2026
7446	ELAN ONE CARD	06302026	REI LIEUTENANT 7867	06/30/2026	51.32	51.32	07/14/2026
7446	ELAN ONE CARD	06302026	HILTON GARDEN INN TOWN COUNCIL	06/30/2026	649.81	649.81	07/14/2026
7446	ELAN ONE CARD	06302026	STAPLES VICTIM SERVICES 1944	06/30/2026	83.10	83.10	07/14/2026
7446	ELAN ONE CARD	06302026	INTL CODE COUNCIL BUILDING 8958	06/30/2026	189.50	189.50	07/14/2026
7446	ELAN ONE CARD	06302026	ALBERTSONS CHIEF 0494	06/30/2026	81.99	81.99	07/14/2026
7446	ELAN ONE CARD	06302026	UPS DETECTIVE SGT 6677	06/30/2026	31.16	31.16	07/14/2026
7446	ELAN ONE CARD	06302026	SIDEWINDERS DETECTIVE SGT 6677	06/30/2026	61.90	61.90	07/14/2026
7446	ELAN ONE CARD	06302026	ATELIER ORTEGA PERSONNEL 7099	06/30/2026	25.00	25.00	07/14/2026
7446	ELAN ONE CARD	06302026	ALBERTSONS PERSONNEL 7099	06/30/2026	82.47	82.47	07/14/2026
7446	ELAN ONE CARD	06302026	DOMINOS PW ADMIN 4874	06/30/2026	32.87	32.87	07/14/2026
7446	ELAN ONE CARD	06302026	QUILL START ADMIN 9251	06/30/2026	1,033.59	1,033.59	07/14/2026
7446	ELAN ONE CARD	06302026	ALLIANZ TRAVEL START OPER 4059	06/30/2026	128.32	128.32	07/14/2026

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
7446	ELAN ONE CARD	06302026	OTC BRANDS START OPER 4059	06/30/2026	69.99	69.99	07/14/2026
7446	ELAN ONE CARD	06302026	KORE ESSENTIALS JPD SGT 2280	06/30/2026	503.82	503.82	07/14/2026
7446	ELAN ONE CARD	06302026	SMITHS JPD TRAINING TWO 6481	06/30/2026	59.71	59.71	07/14/2026
7446	ELAN ONE CARD	06302026	HAT SIX TRAVEL CENTER JPD TRAINI	06/30/2026	40.31	40.31	07/14/2026
7446	ELAN ONE CARD	06302026	PHILLIPS 66 LIEUTENANT 7867	06/30/2026	57.84	57.84	07/14/2026
7446	ELAN ONE CARD	06302026	PINKY G'S PERSONNEL 7099	06/30/2026	75.00	75.00	07/14/2026
7446	ELAN ONE CARD	06302026	JC JEWELERS PERSONNEL 7099	06/30/2026	250.00	250.00	07/14/2026
7446	ELAN ONE CARD	06302026	UNITED CHIEF 0494	06/30/2026	25.79	25.79	07/14/2026
7446	ELAN ONE CARD	06302026	MAILCHIMP COMM DEV 3840	06/30/2026	135.00	135.00	07/14/2026
7446	ELAN ONE CARD	06302026	MIDWAYUSA DETECTIVE SGT 6677	06/30/2026	138.68	138.68	07/14/2026
7446	ELAN ONE CARD	06302026	MR LOCK FACILITIES PW 4135	06/30/2026	15.85	15.85	07/14/2026
7446	ELAN ONE CARD	06302026	STARLINK IT 7309	06/30/2026	20.00	20.00	07/14/2026
7446	ELAN ONE CARD	06302026	DUOLINGO IT 7309	06/30/2026	2,153.59	2,153.59	07/14/2026
7446	ELAN ONE CARD	06302026	COSTCO START ADMIN 9251	06/30/2026	80.95	80.95	07/14/2026
7446	ELAN ONE CARD	06302026	ALASKA AIR START OPER 4059	06/30/2026	1,873.27	1,873.27	07/14/2026
7446	ELAN ONE CARD	06302026	SMITHS STREETS 4277	06/30/2026	2.19	2.19	07/14/2026
7446	ELAN ONE CARD	06302026	HILTON GARDEN INN TOWN COUNCIL	06/30/2026	661.79	661.79	07/14/2026
7446	ELAN ONE CARD	06302026	BEST WESTERN VICTIM SERVICES 19	06/30/2026	354.78	354.78	07/14/2026
7446	ELAN ONE CARD	06302026	SMARTSIGN ADMIN 3567	06/30/2026	435.00	435.00	07/14/2026
7446	ELAN ONE CARD	06302026	PHILLIPS 66 LIEUTENANT 7867	06/30/2026	76.39	76.39	07/14/2026
7446	ELAN ONE CARD	06302026	YIPPY I-O CANDY PERSONNEL 7099	06/30/2026	77.00	77.00	07/14/2026
7446	ELAN ONE CARD	06302026	JC JEWELERS PERSONNEL 7099	06/30/2026	35.30	35.30	07/14/2026
7446	ELAN ONE CARD	06302026	ATELIER ORTEGA PERSONNEL 7099	06/30/2026	25.00	25.00	07/14/2026
7446	ELAN ONE CARD	06302026	STAPLES PERSONNEL 7099	06/30/2026	20.31	20.31	07/14/2026
7446	ELAN ONE CARD	06302026	FLAGSTORE PW ADMIN 4874	06/30/2026	154.88	154.88	07/14/2026
7446	ELAN ONE CARD	06302026	HOME DEPOT FACILITIES PW 4135	06/30/2026	159.00	159.00	07/14/2026
7446	ELAN ONE CARD	06302026	AMAZON IT 7309	06/30/2026	78.99	78.99	07/14/2026
7446	ELAN ONE CARD	06302026	BAMBULAB IT 7309	06/30/2026	392.70	392.70	07/14/2026
7446	ELAN ONE CARD	06302026	5.11 JPD SGT 2280	06/30/2026	518.95	518.95	07/14/2026
7446	ELAN ONE CARD	06302026	MAVERIK JPD TRAINING TWO 6481	06/30/2026	42.39	42.39	07/14/2026
7446	ELAN ONE CARD	06302026	RESCUE ESSENTIALS JPD TRAINING	06/30/2026	667.25	667.25	07/14/2026
7446	ELAN ONE CARD	06302026	BIG D TOWN COUNCIL TWO 8506	06/30/2026	57.71	57.71	07/14/2026
7446	ELAN ONE CARD	06302026	VERBLING VICTIM SERVICES 1944	06/30/2026	102.81	102.81	07/14/2026
7446	ELAN ONE CARD	06302026	SMITHS ANIMAL SHELTER 3324	06/30/2026	77.51	77.51	07/14/2026
7446	ELAN ONE CARD	06302026	UNITED CHIEF 0494	06/30/2026	50.51	50.51	07/14/2026
7446	ELAN ONE CARD	06302026	NOTION LABS COMM DEV 3840	06/30/2026	94.68	94.68	07/14/2026
7446	ELAN ONE CARD	06302026	JACKALOPE TRAVEL STOP DETECTIV	06/30/2026	25.46	25.46	07/14/2026
7446	ELAN ONE CARD	06302026	PICNIC PERSONNEL 7099	06/30/2026	60.00	60.00	07/14/2026
7446	ELAN ONE CARD	06302026	TARGET PERSONNEL 7099	06/30/2026	91.23	91.23	07/14/2026
7446	ELAN ONE CARD	06302026	USPS PW ADMIN 4874	06/30/2026	9.03	9.03	07/14/2026
7446	ELAN ONE CARD	06302026	COSTCO START ADMIN 9251	06/30/2026	47.74	47.74	07/14/2026

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
7446	ELAN ONE CARD	06302026	STAPLES START OPER 4059	06/30/2026	50.55	50.55	07/14/2026
7446	ELAN ONE CARD	06302026	SHELL TOWN COUNCIL ONE 9150	06/30/2026	56.78	56.78	07/14/2026
7446	ELAN ONE CARD	06302026	GALLS JPD SGT 2280	06/30/2026	144.91	144.91	07/14/2026
7446	ELAN ONE CARD	06302026	SMITHS JPD TRAINING TWO 6481	06/30/2026	56.64	56.64	07/14/2026
7446	ELAN ONE CARD	06302026	TETON CO CLERK LEGAL 7687	06/30/2026	16.55	16.55	07/14/2026
7446	ELAN ONE CARD	06302026	EXXON LIEUTENANT 7867	06/30/2026	82.56	82.56	07/14/2026
7446	ELAN ONE CARD	06302026	PEARL ST BAGELS PERSONNEL 7099	06/30/2026	50.00	50.00	07/14/2026
7446	ELAN ONE CARD	06302026	CREEKSIDE MARKET PERSONNEL 70	06/30/2026	59.96	59.96	07/14/2026
7446	ELAN ONE CARD	06302026	CANVA CHIEF 0494	06/30/2026	119.40	119.40	07/14/2026
7446	ELAN ONE CARD	06302026	CANVA COMM DEV 3840	06/30/2026	99.51	99.51	07/14/2026
7446	ELAN ONE CARD	06302026	IAPE DETECTIVE SGT 6677	06/30/2026	65.00	65.00	07/14/2026
7446	ELAN ONE CARD	06302026	GODADDY IT 7309	06/30/2026	599.98	599.98	07/14/2026
7446	ELAN ONE CARD	06302026	APPLE IT 7309	06/30/2026	149.00	149.00	07/14/2026
7446	ELAN ONE CARD	06302026	BAMBULAB IT 7309	06/30/2026	2,149.83	2,149.83	07/14/2026
7446	ELAN ONE CARD	06302026	CREEKSIDE MARKET START ADMIN 9	06/30/2026	145.00	145.00	07/14/2026
7446	ELAN ONE CARD	06302026	SVI MEDIA START OPER 4059	06/30/2026	160.00	160.00	07/14/2026
7446	ELAN ONE CARD	06302026	VRBO START OPER 4059	06/30/2026	449.01	449.01	07/14/2026
7446	ELAN ONE CARD	06302026	TACO BELL TOWN COUNCIL TWO 850	06/30/2026	22.00	22.00	07/14/2026
7446	ELAN ONE CARD	06302026	PILOT VICTIM SERVICES 1944	06/30/2026	73.07	73.07	07/14/2026
7446	ELAN ONE CARD	06302026	SMITHS ANIMAL SHELTER 3324	06/30/2026	98.99	98.99	07/14/2026
7446	ELAN ONE CARD	06302026	EXXON LIEUTENANT 7867	06/30/2026	59.47	59.47	07/14/2026
7446	ELAN ONE CARD	06302026	BROULIMS PERSONNEL 7099	06/30/2026	78.72	78.72	07/14/2026
7446	ELAN ONE CARD	06302026	THE BUNNERY PERSONNEL 7099	06/30/2026	32.00	32.00	07/14/2026
7446	ELAN ONE CARD	06302026	ATELIER ORTEGA PERSONNEL 7099	06/30/2026	177.39	177.39	07/14/2026
7446	ELAN ONE CARD	06302026	ALBERTSONS PERSONNEL 7099	06/30/2026	141.39	141.39	07/14/2026
7446	ELAN ONE CARD	06302026	AMERICAN WATER WORKS ASSN PW	06/30/2026	443.00	443.00	07/14/2026
7446	ELAN ONE CARD	06302026	TRUDOOR FACILITIES PW 4135	06/30/2026	357.75	357.75	07/14/2026
7446	ELAN ONE CARD	06302026	STARLINK IT 7309	06/30/2026	20.00	20.00	07/14/2026
7446	ELAN ONE CARD	06302026	UPS IT 7309	06/30/2026	23.97	23.97	07/14/2026
7446	ELAN ONE CARD	06302026	ALBERTSONS JPD SGT 2280	06/30/2026	119.73	119.73	07/14/2026
7446	ELAN ONE CARD	06302026	HOLIDAY INN EXPRESS JPD SGT 2280	06/30/2026	408.00	408.00	07/14/2026
7446	ELAN ONE CARD	06302026	EXXON JPD TRAINING TWO 6481	06/30/2026	78.50	78.50	07/14/2026
7446	ELAN ONE CARD	06302026	STINKER TOWN COUNCIL TWO 8506	06/30/2026	19.71	19.71	07/14/2026
7446	ELAN ONE CARD	06302026	VERBLING VICTIM SERVICES 1944	06/30/2026	6.48	6.48	07/14/2026
7446	ELAN ONE CARD	06302026	AMERICAN PLANNING ASSN ADMIN 3	06/30/2026	716.44	716.44	07/14/2026
7446	ELAN ONE CARD	06302026	UNITED CHIEF 0494	06/30/2026	26.86	26.86	07/14/2026
7446	ELAN ONE CARD	06302026	STAPLES COMM DEV 3840	06/30/2026	36.89	36.89	07/14/2026
7446	ELAN ONE CARD	06302026	WIND RIVER OUTDOOR DETECTIVE S	06/30/2026	128.66	128.66	07/14/2026
7446	ELAN ONE CARD	06302026	THE BUNNERY PERSONNEL 7099	06/30/2026	12.26	12.26	07/14/2026
7446	ELAN ONE CARD	06302026	WEBSCRIBBLE PERSONNEL 7099	06/30/2026	545.00	545.00	07/14/2026
7446	ELAN ONE CARD	06302026	SMITHS PW ADMIN 4874	06/30/2026	22.65	22.65	07/14/2026

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
7446	ELAN ONE CARD	06302026	DISCOUNT OFFICE FURNITURE STAR	06/30/2026	3,072.49	3,072.49	07/14/2026
7446	ELAN ONE CARD	06302026	COMMUNITY TRANSPORTATION STA	06/30/2026	28.00	28.00	07/14/2026
7446	ELAN ONE CARD	06302026	VRBO START OPER 4059	06/30/2026	719.80	719.80	07/14/2026
7446	ELAN ONE CARD	06302026	GOLDEN THREAD JPD SGT 2280	06/30/2026	38.99	38.99	07/14/2026
7446	ELAN ONE CARD	06302026	HOLIDAY INN EXPRESS JPD SGT 2280	06/30/2026	408.00	408.00	07/14/2026
7446	ELAN ONE CARD	06302026	EXXON JPD TRAINING TWO 6481	06/30/2026	55.31	55.31	07/14/2026
7446	ELAN ONE CARD	06302026	EXXON LIEUTENANT 7867	06/30/2026	57.27	57.27	07/14/2026
7446	ELAN ONE CARD	06302026	HIGH COUNTRY OUTFITTERS PERSO	06/30/2026	250.00	250.00	07/14/2026
7446	ELAN ONE CARD	06302026	PICNIC PERSONNEL 7099	06/30/2026	40.00	40.00	07/14/2026
7446	ELAN ONE CARD	06302026	UNITED CHIEF 0494	06/30/2026	50.51	50.51	07/14/2026
7446	ELAN ONE CARD	06302026	HEALTHY BEING CAF♦ COMM DEV 38	06/30/2026	60.32	60.32	07/14/2026
7446	ELAN ONE CARD	06302026	UPS DETECTIVE SGT 6677	06/30/2026	17.50	17.50	07/14/2026
7446	ELAN ONE CARD	06302026	HOME DEPOT FACILITIES PW 4135	06/30/2026	125.74	125.74	07/14/2026
7446	ELAN ONE CARD	06302026	STARLINK IT 7309	06/30/2026	20.00	20.00	07/14/2026
7446	ELAN ONE CARD	06302026	PADDLE.NET IT 7309	06/30/2026	23.53	23.53	07/14/2026
7446	ELAN ONE CARD	06302026	DISCOUNT OFFICE FURNITURE STAR	06/30/2026	180.74-	180.74-	07/14/2026
7446	ELAN ONE CARD	06302026	JH CHAMBER START OPER 4059	06/30/2026	100.00	100.00	07/14/2026
7446	ELAN ONE CARD	06302026	EXXON TOWN COUNCIL ONE 9150	06/30/2026	54.34	54.34	07/14/2026
7446	ELAN ONE CARD	06302026	WORLDWIDE VICTIM SERVICES 1944	06/30/2026	1,637.81	1,637.81	07/14/2026
7446	ELAN ONE CARD	06302026	EGAUGE SYSTEMS WWTP 2901	06/30/2026	20.00	20.00	07/14/2026
7446	ELAN ONE CARD	06302026	PLANETIZEN ADMIN 3567	06/30/2026	37.49	37.49	07/14/2026
7446	ELAN ONE CARD	06302026	EXXON LIEUTENANT 7867	06/30/2026	62.32	62.32	07/14/2026
7446	ELAN ONE CARD	06302026	WHOLE FOODS PERSONNEL 7099	06/30/2026	50.00	50.00	07/14/2026
7446	ELAN ONE CARD	06302026	CHECKR PERSONNEL 7099	06/30/2026	189.67	189.67	07/14/2026
7446	ELAN ONE CARD	06302026	PEARL ST MARKET PERSONNEL 7099	06/30/2026	25.00	25.00	07/14/2026
7446	ELAN ONE CARD	06302026	HEALTHY BEING CAF♦ PLANNING 558	06/30/2026	38.10	38.10	07/14/2026
7446	ELAN ONE CARD	06302026	SNAP ON PW FLEET 0463	06/30/2026	773.00	773.00	07/14/2026
7446	ELAN ONE CARD	06302026	LUXOR IT 7309	06/30/2026	154.20-	154.20-	07/14/2026
7446	ELAN ONE CARD	06302026	PERPLEXITY IT 7309	06/30/2026	975.00	975.00	07/14/2026
7446	ELAN ONE CARD	06302026	STARLINK IT 7309	06/30/2026	85.00	85.00	07/14/2026
7446	ELAN ONE CARD	06302026	5.11 JPD SGT 2280	06/30/2026	518.95	518.95	07/14/2026
7446	ELAN ONE CARD	06302026	MAVERIK JPD TRAINING TWO 6481	06/30/2026	73.06	73.06	07/14/2026
7446	ELAN ONE CARD	06302026	TETON CO CLERK LEGAL 7687	06/30/2026	28.55	28.55	07/14/2026
7446	ELAN ONE CARD	06302026	WY RIB & CHOP TOWN COUNCIL TWO	06/30/2026	111.06	111.06	07/14/2026
7446	ELAN ONE CARD	06302026	49ER INN VICTIM SERVICES 1944	06/30/2026	325.00	325.00	07/14/2026
7446	ELAN ONE CARD	06302026	INTL CODE COUNCIL BUILDING 8958	06/30/2026	510.00	510.00	07/14/2026
7446	ELAN ONE CARD	06302026	AUDIBLE CHIEF 0494	06/30/2026	16.00	16.00	07/14/2026
7446	ELAN ONE CARD	06302026	CANVA COMM DEV 3840	06/30/2026	129.99	129.99	07/14/2026
7446	ELAN ONE CARD	06302026	B&H PHOTO DETECTIVE SGT 6677	06/30/2026	319.69	319.69	07/14/2026
7446	ELAN ONE CARD	06302026	ALBERTSONS PERSONNEL 7099	06/30/2026	540.90	540.90	07/14/2026
7446	ELAN ONE CARD	06302026	YIPPY I-O CANDY PERSONNEL 7099	06/30/2026	55.50	55.50	07/14/2026

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
7446	ELAN ONE CARD	06302026	STAPLES PLANNING 5582	06/30/2026	165.84	165.84	07/14/2026
7446	ELAN ONE CARD	06302026	TETON VALLEY GARDENS START AD	06/30/2026	100.00	100.00	07/14/2026
7446	ELAN ONE CARD	06302026	BEST WESTERN START ADMIN 9251	06/30/2026	314.14	314.14	07/14/2026
7446	ELAN ONE CARD	06302026	COMMUNITY TRANSPORTATION STA	06/30/2026	28.00	28.00	07/14/2026
7446	ELAN ONE CARD	06302026	STARLINK IT 7309	06/30/2026	85.00	85.00	07/14/2026
7446	ELAN ONE CARD	06302026	AMERICAN RED CROSS JPD SGT 228	06/30/2026	208.80	208.80	07/14/2026
7446	ELAN ONE CARD	06302026	SMITHS JPD TRAINING TWO 6481	06/30/2026	51.31	51.31	07/14/2026
7446	ELAN ONE CARD	06302026	NYC SUB SHOP LIEUTENANT 7867	06/30/2026	48.63	48.63	07/14/2026
7446	ELAN ONE CARD	06302026	ERENTER PERSONNEL 7099	06/30/2026	21.95	21.95	07/14/2026
7446	ELAN ONE CARD	06302026	ALBERTSONS PERSONNEL 7099	06/30/2026	264.90	264.90	07/14/2026
Total 7446:					39,005.00	39,005.00	
1134	ENERGY LABORATORIES INC.	796865	DW COOPER LEAD	07/10/2026	1,250.00	.00	
Total 1134:					1,250.00	.00	
7897	FAMILY/INDUSTRIAL MEDICAL	8748K13850	ELLA SYLVESTER 163335	07/01/2026	65.00	.00	
Total 7897:					65.00	.00	
668	FREEDOM MAILING SERVICE I	53376	UTILITY BILLING	07/10/2026	962.05	.00	
668	FREEDOM MAILING SERVICE I	53376	UTILITY BILLING	07/10/2026	962.05	.00	
668	FREEDOM MAILING SERVICE I	53376	UTILITY BILLING	07/10/2026	54.20	.00	
Total 668:					1,978.30	.00	
7893	FREI, CHARLOTTE	07212026	REIMBURSE LUNCH WITH INTERN	07/21/2026	114.81	.00	
Total 7893:					114.81	.00	
7683	GET FUNKY LLC	19584	JULY-NOV BERGER LANE RENT	07/15/2026	5,154.45	.00	
7683	GET FUNKY LLC	19584	JULY-NOV BERGER LANE RENT	07/15/2026	1,718.15	.00	
7683	GET FUNKY LLC	19584	JULY-NOV BERGER LANE RENT	07/15/2026	11,290.70	.00	
7683	GET FUNKY LLC	19584	JULY-NOV BERGER LANE RENT	07/15/2026	6,381.70	.00	
Total 7683:					24,545.00	.00	
4212	GILLIG LLC	41462049	DRIVERS SEATS	07/16/2026	14,132.56	.00	
4212	GILLIG LLC	41462050	FILTERS	07/16/2026	115.43	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 4212:					14,247.99	.00	
1609	GRAINGER	9960180439	FIBERGLASS	06/22/2026	67.45	.00	
1609	GRAINGER	9971426716	TRIPOD LIGHT KIT	07/01/2026	858.49	.00	
Total 1609:					925.94	.00	
6365	GRAVITY GRAPHICS	16789	FOAM BOARD	07/14/2026	182.48	.00	
Total 6365:					182.48	.00	
2473	GUHEEN, TOM	07172026	PHYSICAL	07/17/2026	155.00	.00	
Total 2473:					155.00	.00	
706	HD SUPPLY, INC.	INV01089410	HYDRANT WRENCH ADAPTER	07/01/2026	655.75	.00	
706	HD SUPPLY, INC.	INV01089412	BOLT AND RATCHET,STRAINGT SAW	07/01/2026	1,126.11	.00	
706	HD SUPPLY, INC.	INV01089674	4 IN CAM LOCK BOX	07/01/2026	2,863.80	.00	
Total 706:					4,645.66	.00	
7860	HERITAGE LANDSCAPE SUPPL	0028240264-0	COUPLER AND ADPT	07/09/2026	207.47	.00	
Total 7860:					207.47	.00	
96	HIGH COUNTRY LINEN	0574259	LAUNDRY,TOWELS	06/08/2026	15.48	.00	
96	HIGH COUNTRY LINEN	0574259	LAUNDRY,TOWELS	06/08/2026	.42	.00	
96	HIGH COUNTRY LINEN	0574259	LAUNDRY,TOWELS	06/08/2026	130.10	.00	
96	HIGH COUNTRY LINEN	05786334	LAUNDRY	06/29/2026	90.00	.00	
96	HIGH COUNTRY LINEN	0581552	MATS	07/13/2026	202.75	.00	
96	HIGH COUNTRY LINEN	0581553	LAUNDRY ,MATS,TOWEL	07/13/2026	10.11	.00	
96	HIGH COUNTRY LINEN	0581553	LAUNDRY ,MATS,TOWEL	07/13/2026	42.01	.00	
96	HIGH COUNTRY LINEN	0581553	LAUNDRY ,MATS,TOWEL	07/13/2026	48.30	.00	
96	HIGH COUNTRY LINEN	0582153	MATS	07/15/2026	77.75	.00	
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	6.65	.00	
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	30.65	.00	
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	23.85	.00	
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	6.65	.00	
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	9.16	.00	
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	30.65	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	34.58	.00	
96	HIGH COUNTRY LINEN	0582451	LAUNDRY	07/16/2026	22.43	.00	
96	HIGH COUNTRY LINEN	0582537	MATS	07/16/2026	329.13	.00	
96	HIGH COUNTRY LINEN	0583020	LAUNDRY	07/20/2026	48.30	.00	
96	HIGH COUNTRY LINEN	0583020	LAUNDRY	07/20/2026	15.48	.00	
96	HIGH COUNTRY LINEN	0583020	LAUNDRY	07/20/2026	.42	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	6.65	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	6.65	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	37.05	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	6.65	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	9.16	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	34.58	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	6.65	.00	
96	HIGH COUNTRY LINEN	0851021	LAUNDRY	07/09/2026	22.43	.00	
96	HIGH COUNTRY LINEN	S0580950	SUPPLIES	07/08/2026	111.12	.00	
96	HIGH COUNTRY LINEN	S0581199	VISA VERSA	07/09/2026	118.64	.00	
Total 96:					1,534.45	.00	
7842	HOYT ARCHITECTS LLC	2664	BLEACHERS/LOCKERS	07/16/2026	9,125.48	.00	
Total 7842:					9,125.48	.00	
503	HUNT CONSTRUCTION INC	23211	SEal over lines	07/14/2026	715.00	.00	
Total 503:					715.00	.00	
7849	HYDROVERGE	227149	HYDRANT BUDDY CORDLESS GATE A	06/30/2026	6,045.00	.00	
Total 7849:					6,045.00	.00	
6121	IDENTISYS, INC	778481	DURAGARD LAMINATES	07/22/2026	412.21	.00	
Total 6121:					412.21	.00	
7126	INEO SYSTRANS USA INC	9532701487	UPGRADE TO R13 SOFTWARE	07/09/2026	1,633.80	.00	
Total 7126:					1,633.80	.00	
106	INTERSTATE BATTERY	950009790	31-MHD	07/08/2026	328.90	.00	
106	INTERSTATE BATTERY	950009831	MTP 48 H6	07/13/2026	106.95	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
106	INTERSTATE BATTERY	950009861	BATTERIES	07/20/2026	583.80	.00	
Total 106:					1,019.65	.00	
6954	IVY OUTDOOR SERVICES LLC	0000208	JUNE BUS ROUTE TRASH	07/03/2026	3,300.57	.00	
Total 6954:					3,300.57	.00	
6931	JACKSON DOWNTOWNER, LLC	INV059-006	reverse july fixed costs	06/08/2026	48,766.00-	.00	
6931	JACKSON DOWNTOWNER, LLC	INV059-006	reverse july fixed costs	06/08/2026	48,766.00	.00	
6931	JACKSON DOWNTOWNER, LLC	INV059-007	OFFICE LEASE AUGUST 2026	07/08/2026	1,000.00-	.00	
6931	JACKSON DOWNTOWNER, LLC	INV059-007	VEHICLE HOURS JUNE 2026	07/08/2026	70,909.74	.00	
6931	JACKSON DOWNTOWNER, LLC	INV059-007	FUEL COST JUNE 2026	07/08/2026	6,374.44	.00	
6931	JACKSON DOWNTOWNER, LLC	INV059-007	FIXED COST AUG 2026	07/08/2026	49,766.00	.00	
Total 6931:					126,050.18	.00	
7163	JACKSON GROUP LOCKBOX	726573IFX2	KIT AIR DRYER AND VALVE	07/07/2026	467.19	.00	
7163	JACKSON GROUP LOCKBOX	726573IFX3	KIT AIR DRYER	07/08/2026	51.91	.00	
7163	JACKSON GROUP LOCKBOX	726573IFX4	KIT INLET CHECK	07/10/2026	430.14	.00	
7163	JACKSON GROUP LOCKBOX	726668IF	SENSOR NITROGEN	07/02/2026	864.81	.00	
7163	JACKSON GROUP LOCKBOX	727546IF	FILTERS	07/14/2026	547.97	.00	
7163	JACKSON GROUP LOCKBOX	CM707616IF	CORE RETURN	07/06/2026	212.50-	.00	
Total 7163:					2,149.52	.00	
131	JACKSON HOLE NEWS & GUID	385714	REGULAR MTG	02/11/2026	785.00	.00	
131	JACKSON HOLE NEWS & GUID	385715	SP MTG	02/11/2026	160.00	.00	
131	JACKSON HOLE NEWS & GUID	385716	JOINT MTG	02/11/2026	125.00	.00	
131	JACKSON HOLE NEWS & GUID	385974	STREET OPERATOR	02/18/2026	896.00	.00	
131	JACKSON HOLE NEWS & GUID	385975	STREET OPERATOR	02/18/2026	760.00	.00	
131	JACKSON HOLE NEWS & GUID	386723	REGULAR MTG	03/18/2026	550.00	.00	
131	JACKSON HOLE NEWS & GUID	388006	ORDINANCE 1458	05/06/2026	260.00	.00	
131	JACKSON HOLE NEWS & GUID	388007	ORDINANCE 1457	05/06/2026	770.00	.00	
131	JACKSON HOLE NEWS & GUID	390031	AD 448688	07/01/2026	26.25	26.25	07/20/2026
131	JACKSON HOLE NEWS & GUID	390277	AD 449141	07/15/2026	561.75	.00	
131	JACKSON HOLE NEWS & GUID	390278	AD 449142	07/15/2026	703.50	.00	
131	JACKSON HOLE NEWS & GUID	390279	AD 449143	07/15/2026	115.50	.00	
131	JACKSON HOLE NEWS & GUID	390403	COMMUNITY SERVICE OFFICER	07/15/2026	623.20	.00	
131	JACKSON HOLE NEWS & GUID	390580	LEGAL COORDINATOR	07/22/2026	1,168.50	.00	
131	JACKSON HOLE NEWS & GUID	390581	TRANSIT SUPERVISOR	07/22/2026	623.20	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 131:					8,127.90	26.25	
1949	VERIZON WIRELESS	6147557887	AD 449180	07/15/2026	623.20	.00	
Total 1949:					623.20	.00	
114	JACKSON LUMBER INC	0001208126-0	BOSCH PLUS EXTREME	07/06/2026	10.79	.00	
Total 114:					10.79	.00	
7456	JHHR DEVELOPMENT II INC.	07072026	3/4 in water meter	07/07/2026	739.11	.00	
Total 7456:					739.11	.00	
139	JORGENSEN ASSOCIATES, PC	58897	SNOW KING TANK OVERFLOW	07/14/2026	442.50	.00	
Total 139:					442.50	.00	
4902	KOIS BROTHERS EQUIPMENT	601679	HYDRAULIC MOTOR	07/15/2026	1,433.76	.00	
Total 4902:					1,433.76	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	4,793.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	3,796.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	378.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	629.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	5,670.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	5,662.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	2,423.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	27,328.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	5,637.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	6,136.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	695.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	2,408.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	2,876.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	4,988.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	1,951.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	4,510.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	5,068.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	1,222.00	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	5,000.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	4,634.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	2,617.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	2,109.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	6,221.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	2,420.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	15,000.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	5,736.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	24,088.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	1,222.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	4,228.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	3,705.00	.00	
2224	LOCAL GOV'T LIABILITY POOL	16609	Membership Renewal 07/01/26-06/30/27	05/21/2026	1,295.00	.00	
Total 2224:					164,445.00	.00	
7894	LOOKING GLASS MEDIA LLC	4622	4 MOVIEWORKS ADS	07/16/2026	3,349.00	.00	
Total 7894:					3,349.00	.00	
156	LOWER VALLEY ENERGY INC	31520	ewip vine street	07/13/2026	269.27	.00	
156	LOWER VALLEY ENERGY INC	31520	ewip vine street	07/13/2026	235.61	.00	
156	LOWER VALLEY ENERGY INC	31520	ewip vine street	07/13/2026	168.30	.00	
Total 156:					673.18	.00	
7898	MATSUMARA, ANDREW	07172026	PHYSICAL	07/17/2026	175.00	.00	
Total 7898:					175.00	.00	
998	METROQUIP INC	P38947	STRIP BROOM AND BINS	07/08/2026	3,979.30	.00	
Total 998:					3,979.30	.00	
4776	MOUNTAIN STATES LIGHTING	15731	ALUMINUM BASES FOR DARK SKY LI	07/22/2026	60,510.00	.00	
Total 4776:					60,510.00	.00	
4623	MSC INDUSTRIAL SUPPLY CO	8370380003	20 AMP FUSE	06/22/2026	16.51	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 4623:					16.51	.00	
7899	MT2030, LLC	AN202614	ANCHOR COMMUNITY PARTNER	07/19/2026	5,000.00	.00	
Total 7899:					5,000.00	.00	
5973	MURDOCH MEMORIALS	142666	VALUE ROCKS	07/17/2026	500.00	.00	
Total 5973:					500.00	.00	
257	NAPA AUTO PARTS INC.	398269	HEALLAMP	06/19/2026	69.99	.00	
257	NAPA AUTO PARTS INC.	402600	2 YEAR WTY BAT	07/07/2026	164.31	.00	
257	NAPA AUTO PARTS INC.	402653	COPPER LUG	07/07/2026	75.00-	.00	
257	NAPA AUTO PARTS INC.	402967	CLEAR RTV, BLUE THREADLOCKER,J	07/08/2026	417.62	.00	
257	NAPA AUTO PARTS INC.	403122	2020 CHEVY TRUCK FILTERS	07/09/2026	109.03	.00	
257	NAPA AUTO PARTS INC.	403140	WHEEL BOLT AND NUT	07/09/2026	3.28	.00	
257	NAPA AUTO PARTS INC.	403151	EXT CORD REEL	07/09/2026	430.98	.00	
257	NAPA AUTO PARTS INC.	403422	OIL FILTER	07/10/2026	9.10	.00	
257	NAPA AUTO PARTS INC.	404051	WELDING GLOVES,BRUSH,PLIERS	07/13/2026	70.47	.00	
257	NAPA AUTO PARTS INC.	404294	2500 CAP	07/14/2026	121.51	.00	
257	NAPA AUTO PARTS INC.	404331	2 YEAR WARRENTY	07/14/2026	164.31	.00	
257	NAPA AUTO PARTS INC.	404332	BATTERY SWITCH	07/14/2026	59.99	.00	
257	NAPA AUTO PARTS INC.	404361	BATTERY	07/14/2026	44.58	.00	
257	NAPA AUTO PARTS INC.	404379	CLAMPS	07/14/2026	11.25	.00	
257	NAPA AUTO PARTS INC.	404513	WTY BAT	07/14/2026	35.57	.00	
257	NAPA AUTO PARTS INC.	404647	SWITCH	07/15/2026	48.95	.00	
257	NAPA AUTO PARTS INC.	405873	AIR FILTER	07/20/2026	16.87	.00	
Total 257:					1,702.81	.00	
187	NELSON ENGINEERING	70887	HIGH SCHOOL RD WATER SUPPLY FA	07/08/2026	18,513.85	.00	
Total 187:					18,513.85	.00	
1504	ONE CALL OF WYOMING	80262	JUNE CDC CODE TJK	07/10/2026	334.95	.00	
Total 1504:					334.95	.00	
332	PLAINSMAN PRINTING & SUPPL	8574	RED LEATHER RECORDER BINDER	07/15/2026	794.84	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 332:					794.84	.00	
4894	PLATT	7H33496	SELF TEST GFI	04/28/2026	128.65	.00	
4894	PLATT	7M2769	HYB-D-LED	07/14/2026	30.48	.00	
Total 4894:					159.13	.00	
7591	POINT S REXBURG	92--1815	TIRES	07/16/2026	600.00	.00	
Total 7591:					600.00	.00	
7723	PREMIER CLEANING SERVICES	2608	BUNK HOUSE CLEANING	07/19/2026	266.00	.00	
Total 7723:					266.00	.00	
6483	PREMIER TRUCK- SALT LAKE C	775848016	KIT TURBO AND CORE DEPOSIT	07/02/2026	2,142.79	.00	
6483	PREMIER TRUCK- SALT LAKE C	CM775844336	CORE RETURN	07/15/2026	282.63-	.00	
Total 6483:					1,860.16	.00	
7892	PUFALL, DAVID	07132026	TRAVEL TO ASST PW DIRECTOR INTE	07/13/2026	1,202.40	.00	
Total 7892:					1,202.40	.00	
7896	ROBERT BROOKE & ASSOCIAT	378880	TRUTH OPERATORS	07/20/2026	118.73	.00	
Total 7896:					118.73	.00	
4723	RON'S TOWING LLC	26-45005	TOW ABANDONED VEHICLE	07/20/2026	447.80	.00	
Total 4723:					447.80	.00	
2850	RT1 INC	0000F04G5628	POSTAGE	07/11/2026	23.59	.00	
Total 2850:					23.59	.00	
7797	SARAZEN, ALEXANDRA	06.30.26	SOCIAL SERVICE CONTRACT	07/16/2026	2,975.00	.00	
Total 7797:					2,975.00	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
4359	SHERWIN-WILLIAMS CO.	215241611107	STFS 5126 CR ZM WH	07/03/2026	1,244.08	.00	
4359	SHERWIN-WILLIAMS CO.	227041611107	STFS 5126 CR ZM WH	07/08/2026	274.80	.00	
4359	SHERWIN-WILLIAMS CO.	252021611107	PAINT	07/15/2026	56.95	.00	
4359	SHERWIN-WILLIAMS CO.	991741605907	STFS 5126 CR ZM WH	07/07/2026	135.15	.00	
Total 4359:					1,710.98	.00	
236	SMITH POWER PRODUCTS,INC	4192854 001	FILTER KITS	07/14/2026	741.61	.00	
Total 236:					741.61	.00	
3961	SPECTRUM	173067801070	INTERNET	07/07/2026	100.00	.00	
Total 3961:					100.00	.00	
6524	SPEEDY CPS, LLC	IX-568390	POUCHES	07/14/2026	122.17	.00	
Total 6524:					122.17	.00	
1505	SPRING CREEK ANIMAL HOSPI	5334668908	EXAM	06/29/2026	165.98	.00	
1505	SPRING CREEK ANIMAL HOSPI	5334669503	VACCINE	07/07/2026	37.91	.00	
Total 1505:					203.89	.00	
7177	STONES	071026	2026 CHEVY TRUCK	07/10/2026	34,390.00	.00	
7177	STONES	51000814 1	HOSE	07/08/2026	199.44	.00	
7177	STONES	51000826 1	SENSOR	07/09/2026	257.92	.00	
7177	STONES	52000528 1	HOSE AND SEAL	06/24/2026	233.38	.00	
Total 7177:					35,080.74	.00	
7843	STONE'S TOWN AND COUNTRY	62001673/1	ALIGNMENT	07/17/2026	213.95	.00	
Total 7843:					213.95	.00	
1054	SUNRISE ENVIRONMENTAL	161870	Krystal ice	07/08/2026	664.95	.00	
Total 1054:					664.95	.00	
7076	SUSTAINABLE STRATEGIES DC	5071	GRANT SERVICES JULY 2026	07/01/2026	8,000.00	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 7076:					8,000.00	.00	
6703	Teton County Alternative to Incarc	07162026	Q4 FY26	07/16/2026	17,791.21	.00	
Total 6703:					17,791.21	.00	
6813	TETON COUNTY PLANNING & B	115	ops strategiews inv 26019	06/30/2026	2,493.75	.00	
Total 6813:					2,493.75	.00	
6902	TETON COUNTY PUBLIC WORK	2026-10	TASK WORK ORDER #3 PUBLIC ENG	07/21/2026	1,235.39	.00	
6902	TETON COUNTY PUBLIC WORK	2026-10	TASK WORK ORDER #1 GRANT ADMI	07/21/2026	3,974.67	.00	
6902	TETON COUNTY PUBLIC WORK	2026-11	TASK WORK ORDER #3 PUBLIC ENG	07/22/2026	363.35	.00	
6902	TETON COUNTY PUBLIC WORK	2026-11	TASK WORK ORDER #1 GRANT ADMI	07/22/2026	4,313.53	.00	
6902	TETON COUNTY PUBLIC WORK	REIMB46%	REIMBURSE BUILD FUNDS	06/17/2026	5,105.99	.00	
6902	TETON COUNTY PUBLIC WORK	REIMB46%	REIMBURSE BUILD FUNDS	06/17/2026	3,400.79	.00	
Total 6902:					18,393.72	.00	
1614	TETON COUNTY-FUND 10	07162026	FUND 10 MAY 2026	07/16/2026	11,479.50	.00	
1614	TETON COUNTY-FUND 10	07162026	REDUCE FOR TTB REIMBURSEMENT	07/16/2026	1,724.30-	.00	
1614	TETON COUNTY-FUND 10	07232026	FUND 10 JUNE 2026	07/23/2026	8,310.97	.00	
1614	TETON COUNTY-FUND 10	5	TRASH/DUMPSTER USE	07/16/2026	525.00	.00	
Total 1614:					18,591.17	.00	
3237	THE AFTERMARKET PARTS CO	84336131	CHAMBER ASSY BRAKE	07/02/2026	476.07	.00	
Total 3237:					476.07	.00	
7888	THE ARTCRAFT GROUP, INC	567500	DUAL PORT FLAT WALL ADAPTER	07/14/2026	2,424.30	.00	
Total 7888:					2,424.30	.00	
7895	THE LINCOLN NATIONAL LIFE I	6519382	SUPPLEMENTAL INS JULY 2026	07/01/2026	3,945.50	.00	
7895	THE LINCOLN NATIONAL LIFE I	JULY26-13417	EMPLOYER PD LIFE STD LTD JULY 20	07/01/2026	7,840.93	.00	
7895	THE LINCOLN NATIONAL LIFE I	JULY26-13417	EMPLOYEE PD LIFE INS	07/01/2026	1,821.19	.00	
Total 7895:					13,607.62	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
4649	ULINE	210190106	6 STEP WORK PLATFORM	07/06/2026	1,774.66	.00	
Total 4649:					1,774.66	.00	
777	UPPER CASE PRINTING INK	4674	WATER WISE	07/14/2026	244.17	.00	
Total 777:					244.17	.00	
7563	UTILIS, INC.	501114	YEAR 2 ACOUSTIC LEAK DETECTION	07/01/2026	21,500.00	.00	
Total 7563:					21,500.00	.00	
7866	VERDIS LLC	2026-3677	MILESTONE #1 DASHBOARD	07/22/2026	4,945.00	.00	
Total 7866:					4,945.00	.00	
1949	VERIZON WIRELESS	6147557887	PHONES	07/15/2026	7,392.35	.00	
Total 1949:					7,392.35	.00	
6639	VETERINARY APPAREL CO.	SI-311319	APPAREL	06/30/2026	243.95	.00	
Total 6639:					243.95	.00	
5022	VISION SERVICE PLAN (CT)	825213178/825	JUNE 2026	05/17/2026	2,059.05	.00	
5022	VISION SERVICE PLAN (CT)	825213178/825	JUNE 2026 COBRA	05/17/2026	22.72	.00	
5022	VISION SERVICE PLAN (CT)	825402043/825	JULY 2026	06/17/2026	21.54	.00	
5022	VISION SERVICE PLAN (CT)	825402043/825	JULY 2026	06/17/2026	1,903.71	.00	
5022	VISION SERVICE PLAN (CT)	825588891/825	AUGUST 2026	07/17/2026	1,975.21	.00	
5022	VISION SERVICE PLAN (CT)	825588891/825	AUGUST 2026	07/17/2026	21.54	.00	
Total 5022:					6,003.77	.00	
517	WAM	18809	DUES 2027	07/07/2026	13,866.00	.00	
Total 517:					13,866.00	.00	
6494	WELLER TRUCK PARTS	403750049	automatic transmission	07/07/2026	13,023.48	.00	
6494	WELLER TRUCK PARTS	403762346	TRANSMISSION	07/17/2026	6,000.00-	.00	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
Total 6494:					7,023.48	.00	
1640	WESTERN STATE	IN003667227	TROUBLE SHOOT GENERATOR	07/08/2026	172.17	.00	
1640	WESTERN STATE	IN003670188	SPRING GULCH	07/10/2026	1,084.30	.00	
1640	WESTERN STATE	IN003670333	BROADWAY PUMP HOUSE	07/10/2026	1,039.97	.00	
1640	WESTERN STATE	IN003670337	START BUS BARN	07/10/2026	1,028.56	.00	
1640	WESTERN STATE	IN003670341	PUBLIC WORKS	07/10/2026	1,040.04	.00	
1640	WESTERN STATE	IN003671529	WWT MAIN	07/11/2026	496.45	.00	
1640	WESTERN STATE	IN003671530	WWT EAST IPS	07/11/2026	495.89	.00	
1640	WESTERN STATE	IN003671531	RANGEVIEW	07/11/2026	1,034.37	.00	
1640	WESTERN STATE	IN003671532	JOSEPHINE	07/11/2026	1,037.52	.00	
1640	WESTERN STATE	IN003675765	SPRUCE PUMP	07/15/2026	1,042.70	.00	
1640	WESTERN STATE	IN003675771	TOWN HALL	07/15/2026	1,156.07	.00	
1640	WESTERN STATE	IN003677299	ELY SPRINGS	07/16/2026	1,089.34	.00	
1640	WESTERN STATE	IN003677319	KARNES WELL 5	07/16/2026	1,210.47	.00	
Total 1640:					11,927.85	.00	
7696	WINDCAVE INC	3247417	PARKING GARAGE MGT	06/30/2026	29.47	.00	
Total 7696:					29.47	.00	
3619	WY CHILD SUPPORT ENFORCE	07242026	266445	07/24/2026	452.30	452.30	07/24/2026
Total 3619:					452.30	452.30	
2842	YELLOW IRON WASTE, LLC	260701316544	3150 ADAMS CANYON	06/30/2026	60.00	.00	
Total 2842:					60.00	.00	
Grand Totals:					927,569.19	41,571.29	

Vendor	Vendor Name	Invoice Number	Description	Invoice Date	Net Invoice Amount	Amount Paid	Date Paid
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Dated: _____

Mayor: _____

City Council: _____

City Recorder: _____

City Treasurer: _____

Report Criteria:
Detail report.
Invoices with totals above \$0 included.
Paid and unpaid invoices included.

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Legal	Presenter:	Lea Colasuonno
Agenda Item:	Standard Contract Consideration for Approval	Public Comment:	Yes

Purpose or Policy Considerations.

The purpose of this item is for the Council to review and consider contracts to which the Town of Jackson would be a party.

Recommendations.

Staff recommend that the Council approve the contracts included with this staff report.

Background, Analysis, and Key Policy Questions.

1. Amendment and Restatement Workforce Ownership Deed Restriction for 440 West Kelly Avenue No. 12

- *Purpose:* The purpose of this item is for Council to consider updating the Workforce Ownership Deed Restriction for 440 West Kelly Avenue No. 12 – a housing unit at Kelly Place Condos. The home has been sold, and the deed restriction needs to be updated to reflect the new owners.
- *Term:* The term is perpetual.
- *Cost and Payment Terms:* \$0.00.
- *Department & Budget Detail:* This item is for the Housing Department and has no cost to the Department.

2. Letter Agreement with Teton Conservation District

- *Purpose:* The purpose of this Letter Agreement is to receive funding from the Teton Conservation District for priority projects at the Town of Jackson, including water quality monitoring, irrigation improvements, and Karns Meadow ecological monitoring. Execution of the Letter Agreement evidences the Town's agreement with the Teton Conservation District's grant recipient requirements.
- *Term:* Date of execution through June 1, 2027.
- *Cost and Payment Terms:* Teton Conservation District will reimburse the Town of Jackson for up to 50% of the cost of the projects, up to the approved amount of \$22,000. The Town may submit up to two reimbursement requests annually.
- *Department & Budget Detail:* This item is for the Administration Department and is included in the Departmental budget for the Karns ecological monitoring, water quality testing at the wastewater treatment plant, and Town irrigation controllers line items.

The key policy question with respect to each contract listed above is whether the Town Council approves of the agreements as presented by staff.

Possible Alternatives.

For each contract included with the staff report the Council has the option to:

- A. Direct staff to negotiate different terms or conditions with the contracting party.
- B. Not to enter the contract.

Comprehensive Plan & Priority Alignment.

Section 8.1 and 8.2: Timely, efficiently, and safely deliver quality services and facilities in a fiscally responsible and coordinated manner.

Fiscal Impact.

The fiscal impact for each contract is set forth above.

Staff Impact.

The primary impact on staff for contracts falls in the Legal Department, and averages 3 hours for each contract. Secondary impacts on staff for contracts are felt in each department to which the contract is relevant, and averages two hours for each contract.

Attachments or Links.

The contracts in the order listed above are attached to the staff report as follows:

1. Amendment and Restatement Workforce Ownership Deed Restriction for 440 West Kelly Avenue No. 12
2. Letter Agreement with Teton Conservation District

Suggested Motion.

1. I move to approve the Amendment and Restatement Workforce Ownership Deed Restriction for 440 West Kelly Avenue No. 12, subject to minor changes by staff.
2. I move to approve the Letter Agreement with Teton Conservation District, subject to minor changes by staff

**Amendment and Restatement
Workforce Ownership Deed Restriction for Property
Located at 440 West Kelly Unit 12, Jackson Wyoming
West Kelly Condominiums**

This Deed Restriction ("Restriction") is made and entered into this ____ day of _____, 2026 (the "Effective Date"), by the undersigned owner of the property ("Declarant") and Town of Jackson, Wyoming.

RECITALS:

WHEREAS, Declarant holds fee ownership interest in that certain real property, located in Town of Jackson, Wyoming, and more specifically described as follows:

Unit 12 of the 440 West Kelly Condominium Addition to the Town of Jackson, Teton County Wyoming according to that final plat recorded in the Office of the Teton County Clerk on March 6, 2023, as Plat No 1446.

PIDN: 22-41-16-33-1-74-012 ("Residential Unit")

WHEREAS, this restriction amends, restates, supersedes, and replaces in its entirety the Amended and Restated Special Restrictions for Workforce Ownership Housing Located at the 440 West Kelly Condominium Addition to the town of Jackson; recorded on May 14, 2024, As Document Number 1081870 in the Teton County Clerk's office (hereafter "the 2024 Restriction";

WHEREAS, as a condition of its approval, the original Declarant developed 440 West Kelly Condominium Addition to the Town of Jackson as set forth in the B20-0794 Permit issued on April 21, 2021 (the "Approval"), Owner was required to provide Workforce Ownership Housing in accordance with the Approval;

WHEREAS, in accordance with Section 11.C of the 2024 Restriction, the Owner and Town of Jackson desire to amend and restate the restriction for the following Residential Unit.

- Unit 12 with 2 bedrooms ("Residential Unit")

WHEREAS, the Jackson Town Council and Teton County Board of County Commissioners resolved to form the Jackson/Teton County Housing Authority, a duly constituted housing authority pursuant to Wyoming Statutes §15-10-116, as amended, and its successors or assigns, known as the Jackson/Teton County Housing Authority ("JTCHA");

WHEREAS the Jackson Town Council and Teton County Board of County Commissioners further resolved to create the Jackson/Teton County Affordable Housing Department ("Housing Department") who are employees of Teton County and agents acting on behalf of the JTCHA, empowered to enforce this Restriction.

WHEREAS, the Jackson Town Council and Teton County Board of County Commissioners have duly enacted the Jackson/Teton County Housing Department Rules and Regulations ("Rules and Regulations"), and this Restriction is subject to such Rules and Regulations as they are amended from time to time. The term "Rules

and Regulations” is defined as the Jackson/Teton County Housing Department Rules and Regulations, as the same may be amended from time to time, and which are codified in the Municipal Code of the Town of Jackson, and enacted by resolution of Teton County, Wyoming pursuant to the Wyoming Administration Procedures Act. If there are no such written policies, procedures, or guidelines (or a written policy, procedure, or guideline with respect to a specific matter), then the reference shall be to the current applied policy or policies of the Housing Department or its successor. Procedural and administrative matters not otherwise addressed in this Restriction shall be as set forth in the Rules and Regulations, as the same may be amended from time to time. In the case of a conflict between this Restriction and the Rules and Regulations, this Restriction shall apply;

WHEREAS, in furtherance of the goals, objectives, requirements, and conditions of Permit No. [insert number], and consistent with the Town of Jackson’s goal of providing decent, safe, and sanitary housing to qualified employees working in Teton County, Wyoming, that is affordable, Declarant agrees to restrict the use and occupancy of the Residential Unit as set forth herein;

WHEREAS, Declarant desires to record this Restriction and declare that the Residential Unit shall be held, sold, and conveyed in perpetuity subject to this Restriction and the Rules and Regulations, as they may be amended from time to time, which Restriction shall be in addition to all other covenants, conditions, or restrictions of record affecting the Residential Unit, and shall be enforceable by JTCHA and Town of Jackson, Wyoming. Furthermore, Declarant hereby declares that where the term “Declarant” is used in this Restriction it includes and means each and every subsequent owner, unless otherwise specifically clarified.

NOW, THEREFORE, in satisfaction of the conditions in, and consideration of Permit No. B20-0794, Declarant hereby declares, covenants, and agrees for itself and each and every person, organization, partnership, or other entity acquiring ownership of the Land and/or Residential Unit, that such Land and/or Residential Unit shall be held, used, occupied, developed, transferred, and conveyed subject to this Restriction in perpetuity.

ARTICLE I OWNERSHIP

1.1 Qualified Household. The ownership of the Residential Unit shall be limited to natural persons who meet the definition of a Qualified Household, as set forth herein and as further defined in the Rules and Regulations (“Qualified Household”).

1.1.1 Employment. At time of purchase and in perpetuity during ownership, at least one member of the Qualified Household must work a minimum of 1,560 hours per year for a Local Business, as that term is defined in the Rules and Regulations.

1.1.2 Income Limit. At time of purchase and in perpetuity during ownership, the Qualified Household must earn, at minimum, 75% of its income from a Local Business, as that term is defined in the Rules and Regulations. A maximum of 25% of all Household income may be obtained from non-local sources, as set forth in the Rules & Regulations.

1.1.3 Residential Real Estate. At time of purchase and in perpetuity during ownership, no member of the Qualified Household may own (whether individually, in trust, or through an entity, including, without limitation, a partnership, limited partnership, limited liability company, corporation, association, or the like) real estate except as set forth in the Rules and Regulations.

1.2 Qualification Determination by the Housing Department. The Housing Department shall determine, in its sole discretion, whether a prospective buyer is a Qualified Household. The Department shall use

written applications, representations, and information to make the determination, which shall include the verification of those materials as necessary and appropriate to establish and substantiate eligibility.

- 1.3 Exception for Declarant. Notwithstanding the foregoing, it is understood and acknowledged that at the time of recordation of this Restriction the Declarant may still hold title to the Residential Unit. If Declarant still holds title to the Residential Unit at the time of recordation, Declarant is not required to be a Qualified Household. However, Declarant understands and agrees that it is required to sell the Residential Unit to a Qualified Household in accordance with the terms of this Restriction and the Rules and Regulations no later than one year after receipt of a certificate of occupancy for the Residential Unit.
- 1.4 Ownership by Housing Department. Notwithstanding the foregoing, JTCHA may purchase and own the Residential Unit.

ARTICLE II OCCUPANCY, IMPROVEMENT, AND USE

- 2.1 Rules and Regulations Applicability. All applicable limitations on occupancy, improvement, and use set forth in the Rules and Regulations apply to the Residential Unit.
- 2.2 Business Activity. No business activities shall be carried out in a Residential Unit, except to the extent allowed in the Rules and Regulations.
- 2.3 Guests. Guests over the age of 18 shall not occupy the Residential Unit for more than 30 cumulative days per calendar year.
- 2.4 Maintenance. Declarant shall be responsible for the cost and expense to keep and maintain the interior, exterior, and all other aspects of the Residential Unit not otherwise maintained by a homeowner's association in a safe, decent, and sanitary condition pursuant to the Rules and Regulations. In the event Declarant fails to maintain the Residential Unit in a safe, decent, and sanitary condition, the Housing Department may, but is not required to, take action to restore the unit to a safe, decent, and sanitary condition, and be reimbursed by Declarant for costs thereof, all as set forth in the Rules and Regulations.
- 2.5 Capital Improvements. Declarant may only undertake capital improvements to the Residential Unit, and only get reimbursed for such, to the extent set forth in the Rules and Regulations.
- 2.6 Insurance. Declarant shall keep the Residential Unit continuously insured as set forth in the Rules and Regulations as determined at the sole discretion of the Housing Department. Declarant shall, as often as necessary to prove compliance herewith at all times, furnish and deposit with the Housing Department certificates of such insurance policy to be maintained by Declarant with evidence of payment of the premiums thereon.
- 2.7 Compliance with Laws and CC&Rs. The Residential Unit shall be occupied in full compliance with this Restriction; the Rules and Regulations; all laws, statutes, codes, rules, regulations of state, local, and federal law; Covenants, Conditions & Restrictions, defined as any set of rules and governing the use of the Residential Unit that are recorded in the Teton County Clerk's records by a Homeowner's Association or other entity; and all supplements and amendments thereto.
- 2.8 Inspection. Upon reasonable notice to Declarant, the Housing Department shall have the right to inspect the Residential Unit from time to time as set forth in this Restriction and the Rules and Regulations.
- 2.9 Renting. The Residential Unit may not be rented, nor may any part thereof, including without limitation, the garage, any portion of any structure, or any room within any structure except to the extent allowed

in Rules & Regulations. Neither shall the same be otherwise occupied by persons other than as permitted in this Restriction.

2.10 Periodic Reporting. To confirm compliance with this Restriction, the Rules and Regulations, and other covenants, regulations, ordinances, or rules governing the ownership, occupancy, use, improvement, or transfer of the Residential Unit, Declarant shall timely comply with information requests, application material submissions, and all supplemental requests as set forth in the Rules and Regulations. The documentation required to be provided by the Declarant and any prospective purchaser of the Residential Unit may include, but is not limited to, 1040 tax returns, W-2s, employment affidavits, bank statements, court decrees, etc. for the Qualified Household.

2.11 Occupancy. The Residential Unit must be occupied as the Qualified Household's sole and exclusive primary residence, and they must physically reside therein on a full-time basis pursuant to the Rules and Regulations.

ARTICLE III SALE

3.1 Initial Sale of Residential Unit. At the time of sale from Declarant to a new owner ("Initial Sale"), the Residential Unit may only be sold to a Qualified Household at a purchase price as Declarant and prospective buyer may determine and subject to this Restriction. After Declarant and a prospective buyer enter into an agreement for the purchase and sale of the Unit, and at least 30 days prior to purported closing of the purchase and sale, the prospective buyer shall provide such information as may be required by the Housing Department for it to determine if the prospective buyer is a Qualified Household. If the prospective buyer does not qualify as a Qualified Household, such buyer may not purchase the Unit. All subsequent sales shall be executed in accordance with Article 3.2.

3.2 Resale. The seller of a Residential Unit shall give written notice to the Housing Department of their intention to sell ("Notice to Sell"), and after receipt of such notice, the Housing Department shall determine the Maximum Resale Price, as provided in Article 3.3. Upon the Housing Department's determination of the Maximum Resale Price, the sale of the Residential Unit shall be facilitated by the Housing Department and shall be completed in accordance with the Rules and Regulations, as they may be amended from time to time. At its sole discretion, the Housing Department may approve the use of a realtor. Every conveyance of a Residential Unit shall be subject to this Restriction and the Rules and Regulations, as they may be amended from time to time. Notwithstanding the foregoing, upon receipt of a Notice to Sell, the Housing Department may purchase such Residential Unit. The prospective purchaser of the Residential Unit must attend a compliance conference with the Housing Department prior to initial and each subsequent closing on the purchase of the Residential Unit.

3.3 Maximum Sale Price. A Residential Unit may not be sold for a purchase price in excess of the "Maximum Sale Price." The Maximum Sale Price is the Maximum Sale Price as calculated by the Housing Department in accordance with the Rules and Regulations, as they may be amended from time to time. The Maximum Sale Price for a prospective purchaser is the current owner's purchase price plus an increase in price of the Denver-Aurora-Lakewood CPI (if such ceases to exist then a comparable CPI Index as determined in the sole discretion of the Housing Department) or 3%, whichever is lower per year of ownership compounded annually, plus the depreciated cost of pre-approved or government-required capital improvements, plus any other costs allowed by the Housing Department, all as more fully described in the Rules and Regulations. Notwithstanding the determination of the Maximum Sale Price, the actual sales proceeds delivered to a seller may be reduced to account for restoration,

maintenance, cleaning, or repair of a Residential Unit (including, without limitation, replacement of carpets, painting, roof repair, siding maintenance/replacement, etc.) determined necessary in the Housing Department's sole discretion. To ensure that the sales price of any Residential Unit is limited to the Maximum Sale Price, no purchaser of a Residential Unit shall assume any obligation of a seller, nor shall such purchaser pay or provide to a seller any other form of consideration in connection with the sale of the Residential Unit. The calculation of the Maximum Sale Price, as made by the Housing Department, shall be final and binding on all parties. Nothing herein shall be construed to constitute a representation or guaranty that, upon the sale of a residential unit, a seller shall obtain the entire maximum sale price.

ARTICLE IV TERMINATION, AMENDMENT, CORRECTION

- 4.1 Termination by Town of Jackson, Wyoming. This Restriction may be terminated after a determination by Town of Jackson, Wyoming that this Restriction is no longer consistent with the goal of providing affordable housing.
- 4.2 Termination Resulting from Foreclosure by a Qualified Mortgagee. This Restriction as applied to a Residential Unit may be terminated by a Qualified Mortgagee in the event of a lawful foreclosure of the Residential Unit by such Qualified Mortgagee, as follows:
- 4.2.1 The Qualified Mortgagee provided to the Housing Department copies of all notices of intent to foreclose and all other notices related to the foreclosure contemporaneously with its service of such notices upon Declarant.
- 4.2.2 JTCHA did not exercise its rights as provided in Article V Qualified Mortgage.
- 4.2.3 Termination may occur only after expiration of all applicable redemption periods and subsequent recordation of a Sheriff's Deed (or other transfer document as approved by the JTCHA in its sole and absolute discretion) conveying title to a purchaser, who is not (i) Declarant, (ii) a member of the Qualified Household, (iii) a person affiliated with or related to a Declarant or any member of the Qualified Household, or (iv) JTCHA.
- 4.2.4 In the event of a foreclosure hereunder, the Qualified Mortgagee shall pay to the Housing Department all proceeds remaining, if any, after payment of the Qualified Mortgage loan amount, interest, penalties, and fees, which proceeds would have been payable to Declarant of the foreclosed Residential Unit.
- 4.2.5 Notwithstanding the notice requirements to the Housing Department in this Section, if a Qualified Mortgagee has failed to provide the Housing Department copies of all notices of intent to foreclose and all notices related to the foreclosure contemporaneously with its service on Declarant, such Qualified Mortgagee, prior to foreclosing on the Residential Unit, shall provide the Housing Department with notice of its intent to foreclose ("Mortgagee Notice"). The Mortgagee Notice shall include all information relevant to Declarant's default and the actions necessary to cure such default. JTCHA shall have 45 days from the date of the Mortgagee Notice to exercise its rights under Article V, Qualified Mortgage. If JTCHA fails to exercise its rights within such 45-day period, the Qualified Mortgagee may foreclose on the Residential Unit as provided herein.
- 4.2.6 Nothing herein shall limit or restrict Declarant's right of statutory redemption, in which event this Restriction shall remain in full force and effect.

- 4.3 Amendment. This Restriction may be amended by a signed, written amendment executed by both Town of Jackson, Wyoming and Declarant and recorded in the Teton County Clerk's Office against title to the Residential Unit.
- 4.4 Correction. JTCHA may unilaterally correct this Restriction to address scrivener's errors, erroneous legal descriptions, or typographical errors.

ARTICLE V QUALIFIED MORTGAGE

- 5.1 Qualified Mortgage. Only a mortgage which is a "Qualified Mortgage" shall be permitted to encumber a Residential Unit. A "Qualified Mortgage" is a mortgage that:
- 5.1.1 Is the primary construction financing loan and mortgage for initial construction of the Residential Unit and related project, or any refinancing of such loan and mortgage, as long as such mortgage has a maximum loan to value ratio of 100%; and
 - 5.1.2 Is a mortgage solely for the purchase or refinance of the loan for the purchase (specifically excluding loans taken out for any other purpose, unless otherwise approved by the Housing Department) as long as the principal amount of such mortgage at purchase does not exceed 96.5% of the purchase price, and thereafter the principal amount of such mortgage, any refinanced mortgage and/or additional mortgages combined does not exceed 95% of the then current Maximum Resale Price as the same is determined by the Housing Department at the time or times any such mortgage purports to encumber the Residential Unit; and
 - 5.1.3 Runs in favor of a "Qualified Mortgagee," defined as:
 - 5.1.3.1 An "institutional lender" such as, but not limited to, a federal, state, or local housing finance agency, a bank (including savings and loan association or insured credit union), an insurance company, or any combination of the foregoing, the policies and procedures of which institutional lender are subject to direct governmental supervision; or
 - 5.1.3.2 A "community loan fund", or similar non-profit lender to housing projects for income-eligible persons (e.g., is not given to or acquired by any individual person); or
 - 5.1.3.3 A non-affiliated, legitimate, "finance company." In no event may such finance company be an individual or any entity that is affiliated with or has any affiliation with Declarant or any family member of Declarant; or
 - 5.1.3.4 JTCHA or Housing Department for any monies advanced by JHTCA or Housing Department in connection with a mortgage or other debt with respect to Residential Unit; or
 - 5.1.3.5 the provider of a loan as described in Article 5.1.
- 5.2 Any mortgage, lien, or other encumbrance executed or recorded against a Residential Unit that is not a Qualified Mortgage shall:
- 5.2.1 be deemed unsecured; and
 - 5.2.2 only be a personal obligation of a Declarant and shall not affect or burden, and shall not be enforceable against, such Residential Unit.
 - 5.2.3 Additionally, the execution or recordation of such mortgage, lien, or other encumbrance shall be deemed a Breach hereunder, and JTCHA and/or the Housing Department may exercise any and all of its remedies hereunder or otherwise, including, without limitation, the right to exercise its Purchase Option and Forced Sale.
- 5.3 In the event a Declarant fails to make timely payment owed or otherwise breaches any of the covenants or agreements made in connection with any mortgage (Qualified or otherwise), lien, or other encumbrance purporting to affect the Residential Unit, or fails to timely make any other payment required in connection with the Residential Unit (including without limitation homeowner's association dues and fees, assessments, payments to contractors, materialmen, or other vendors for work

undertaken for which a lien could be filed against the Residential Unit), the Housing Department shall have (in addition to the any other remedies) the right to:

5.3.1 Cure such default and assume the payments and other obligations of Declarant. In such event, Declarant shall be in Breach of this Restriction, and the JTCHA may exercise any and all of its remedies hereunder or otherwise, including, without limitation, the right to exercise its Purchase Option and Forced Sale. In addition to such remedies, Declarant shall also be liable to the Housing Department for any amounts of money advanced.

5.3.2 Acquire the loan from the lender by paying the balance due together with reasonable accrued interest and costs, and the JTCHA shall thereafter have the right to foreclose upon the Residential Unit in accordance with the mortgage and other loan documents or take such other action as the JTCHA shall determine.

5.3.3 Purchase the Residential Unit at any foreclosure sale, and in such event, notwithstanding anything to the contrary herein, the Residential Unit shall remain subject to this Restriction.

ANY LENDER BY ENTERING INTO A LOAN TRANSACTION WITH DECLARANT OF A RESIDENTIAL UNIT HEREBY CONSENTS TO THE FOREGOING AND ACKNOWLEDGES THAT ANY INTEREST ACQUIRED BY VIRTUE OF ITS LIEN OR MORTGAGE SHALL BE SUBJECT AND SUBORDINATE TO THIS RESTRICTION.

ARTICLE VI TRANSFER

6.1 Transfer. The Residential Unit may only be sold in accordance with Articles 3.1 and 3.2, and only or transferred as follows, in accordance with the Rules and Regulations:

6.1.1 Divorce. The provisions contained in this Article 6.1.1 apply only after the Initial Sale of the Residential Unit. In the event of the divorce of Declarant, the Housing Department may consent to the transfer of the Residential Unit to the spouse, which spouse may not otherwise qualify as a Qualified Household, upon receipt of an order issued by a Court of competent jurisdiction ordering such transfer.

6.1.2 Death. The provisions contained in this Article 6.1.2 apply only after the Initial Sale of the Residential Unit. In the event of the death of the Declarant, the transfer of the Residential Unit will be as set forth in the Rules and Regulations.

6.1.3 Nonqualified Transferee. If title to the Residential Unit vests in a Nonqualified Transferee, as defined in the Rules and Regulations, the Residential Unit shall immediately be listed for sale in accordance with the Sale Provisions of this Restriction and in compliance with the Rules and Regulations, or in the alternative, the Housing Department may exercise its option herein to purchase the Residential Unit. The following shall apply when the Housing Department determines there is a Nonqualified Transferee:

6.1.3.1 The Housing Department shall provide the Nonqualified Transferee a reasonable period within which to qualify as a Qualified Household.

6.1.3.2 If the Nonqualified Transferee does not qualify as a Qualified Household within such reasonable period, they shall cooperate with the Housing Department to effectuate the sale, conveyance, or transfer of the Residential Unit to a Qualified Household and shall execute any and all documents necessary to such sale, conveyance, or transfer.

6.1.3.3 A Nonqualified Transferee shall comply with this Restriction, the Rules and Regulations, the Covenants, Conditions & Restrictions, zoning, and all laws governing the ownership, occupancy, use, development, improvement, and transfer of the Residential Unit.

- 6.1.3.4 A Nonqualified Transferee may only occupy the Residential Unit with the prior written consent of the Housing Department.

ARTICLE VII GENERAL PROVISIONS

7.1 Breach.

7.1.1 Breach Defined. Each of the following shall be considered a breach hereof (“Breach”).

7.1.1.1 A violation of this Restriction, the Rules and Regulations, the Declaration of Covenants, Conditions & Restrictions, or any rule or law a violation of which could result in a lien recorded against a Residential Unit.

7.1.1.2 Failure to pay any financial obligation due or failure to perform a non-monetary obligation with respect to the Residential Unit which failure to pay or perform could result in a lien recorded against a Residential Unit. This includes, without limitation, homeowner dues, property taxes, contractor and servicer bills, and payment required by a promissory note secured by a mortgage recorded against a Residential Unit. Declarant shall notify the Housing Department in writing of any notification received from any party of past due payments or failure to perform within ten (10) calendar days of the date of the first notice of any such failure to pay or perform.

7.1.1.3 The Residential Unit is taken by execution or by other process of law, or Declarant is judicially declared insolvent, or Declarant assigns or attempts to assign the property for the benefit of creditors, a receiver, trustee, or other similar officer being appointed to take charge of any substantial part of the Residential Unit or Declarant’s property by a court of competent jurisdiction.

7.1.1.4 Fraud, perjury, or material misrepresentation by Declarant or an occupant of the Residential Unit in the provision of information or documents included in an application, or additional submissions of requested documentation by the Housing Department, and related to the mission, goals, objectives, requirements, and conditions of JTCHA and its programs.

7.1.2 Administrative Process. Upon any alleged Breach, the parties must proceed in accordance with the default process set forth in the Rules and Regulations, as they may be amended from time to time.

7.1.3 Court Enforcement. After exhausting the administrative process required by Article 7.1.2, any order of the Housing Authority Board may be appealed in a court of competent jurisdiction as defined in Section 7.7 of this Restriction.

7.1.4 Breach Remedies. In addition to any other remedies the JTCHA may have at law or equity, in the event of Breach, the JTCHA’s remedies shall include, without limitation, the following:

7.1.4.1 Purchase Option. JTCHA shall have the option to purchase the Residential Unit for the lesser of the Maximum Resale Price or the appraised value with this Restriction in place, subject to the restrictions of this Article (“Option”) and Article III.

7.1.4.1.1 If the Option is exercised and a loan described in Article 5.1 is outstanding, the purchase price for the Option shall be the outstanding principal, accrued interest, and reasonable costs of such loan, regardless of any other provision of this Restriction (“Purchase Price”).

7.1.4.1.2 If Declarant has not completed the Initial Sale of all Residential Units and the Housing Department exercises the Option against those Residential Units which

have not had an Initial Sale, the Purchase Price shall be prorated. In such event, the formula for establishing JTCHA's Purchase Price shall be Purchase Price multiplied by [# of units to which Option is exercised / (total built - # of Initial Sales)]. By way of example only, if 16 Residential Units are built and 4 have Initial Sales and the Housing Department exercises the Option on 6 units, the formula would be: Purchase Price x $6/(16-4)$...Purchase Price x .50.

7.1.4.1.3 In exercising its Option, JTCHA shall provide written notice of such to Declarant. Such notice shall include the Purchase Price and the timing for the closing of the purchase. The Option must be exercised within 90 days from receipt of a notification of a Breach.

7.1.4.2 Forced Sale. JTCHA may require Declarant to sell the Residential Unit in accordance with the resale procedures set forth in Article III and the Rules and Regulations. Such sale shall be subject to this Restriction.

7.1.4.3 Whether JTCHA elects to exercise its Option or requires a Forced Sale, all proceeds, unless otherwise required by statute, will be applied in the following order:

FIRST, to the payment of any unpaid taxes;

SECOND, to the payment of any Qualified Mortgage;

THIRD, to assessments, claims, and liens on the Residential Unit (not including any mortgage or lien purportedly affecting the Residential Unit which is not a Qualified Mortgage);

FOURTH, to the payment of the closing costs and fees;

FIFTH, to the 2% facilitation fee to JTCHA;

SIXTH, to the payment of any penalties assessed against Declarant by JTCHA;

SEVENTH, to the repayment to JTCHA of any monies advanced by it in connection with a mortgage or other debt with respect to a Residential Unit, or any other payment made on Declarant's behalf;

EIGHTH, to any repairs needed for the Residential Unit; and

NINTH, any remaining proceeds shall be paid to Declarant.

If there are insufficient proceeds to satisfy the foregoing, Declarant shall be liable for such deficiency.

7.1.4.4 Appointment of Housing Manager as Attorney-in-Fact. In the event JTCHA exercises its Option or requires a Forced Sale, Declarant hereby irrevocably appoints the Housing Manager as their attorney-in-fact to effect any such purchase or sale on their behalf (including without limitation the right to cause an inspection of the Residential Unit and make such repairs to the Residential Unit as JTCHA, or its designee, may reasonably deem necessary), and to execute any and all deeds of conveyance or other instruments necessary to fully effect such purchase or sale and conveyance.

7.1.5 Limitation on Appreciation at Resale. JTCHA may fix the Maximum Resale Price of a breaching owner's Residential Unit to the Maximum Resale Price for the Residential Unit as of the date of an owner's Breach (or as of such date after the Breach as JTCHA may determine), and in such event, the Maximum Resale Price shall cease thereafter to increase.

7.1.6 Remedies. JTCHA may, at its discretion, invoke any additional remedies available to it and seek any such relief, at law or equity, as may be appropriate, including but not limited to, specific performance of this Restriction and the Rules and Regulations; temporary, permanent, or preliminary injunctive relief (including prohibiting a proposed sale or transfer); a declaration that a sale or transfer is void; a forced sale; and monetary damages of up to \$750/day to the extent permitted by the Land Development Regulations for violations. Any equitable relief may be sought singly or in combination with such other remedies the JTCHA may be entitled to,

either pursuant to this Restriction, the Rules and Regulations, the applicable Land Development Regulations, or under the local, state, or federal law.

7.1.7 Hold Harmless. In the event of a Breach, Declarant hereby holds Town of Jackson, Wyoming, JTCHA, and the Housing Department, their officials, employees, and agents harmless against any and all claims, suits, or actions of every name, kind, and description, and any other loss or cost, including, but not limited to, that caused by the concurrent active or passive negligence of Town of Jackson, Wyoming, JTCHA, and the Housing Department, their officials, employees, and agents.

7.1.8 Reimbursement. In the event of a Breach, Declarant hereby agrees to reimburse the actual expenses, attorney's fees, and costs for any action the JTCHA and/or Housing Department expends to enforce this Restriction.

7.2 No Legal Action. Neither the Declarant, nor any prospective purchaser, tenant, renter, occupant, or other party shall have the right to sue or bring other legal process against Town of Jackson, Wyoming or the Housing Department, or any person affiliated with the Town of Jackson, Teton County, Wyoming, or the Housing Department arising out of this Restriction. Neither the Town of Jackson, Teton County, Wyoming, nor the Housing Department shall have any liability to any person aggrieved by the decision of the Town of Jackson, Teton County, Wyoming, or the Housing Department regarding eligibility of a Qualified Household or any other matter relating to this Restriction.

7.3 Restriction as a Covenant. This Restriction shall constitute covenants running with the Land and the Residential Unit, as a burden thereon, and shall be binding on all parties having any right, title, or interest in the Land, the Residential Unit, or any part thereof, their heirs, devisees, successors and assigns, and shall inure to the benefit of and shall be enforceable by JTCHA, the Housing Department, and Town of Jackson, Wyoming.

7.4 Notices. All notices required to be served upon Declarant and Town of Jackson, Wyoming and shall be transmitted by one of the following methods: prepaid overnight courier; or by postage paid certified mail, return receipt requested, at the address set forth below for said party. Notice shall be effective the day it is mailed.

To JTCHA / Housing Department:
Jackson/Teton County Affordable Housing Department
P.O. Box 714
Jackson, WY 83001

With a Copy to:
Town of Jackson, Wyoming.
Attn: Clerk
P.O. Box 1687
Jackson, WY 83001

Declarant
To the Address on file with the Teton County Clerk's Office

7.5 Attorney's Fees. In the event Town of Jackson, JTCHA, or the Housing Department shall be required to retain counsel and file suit for the purpose of enforcing the terms and conditions of this Restriction, and is the prevailing party, Town of Jackson, JTCHA, or the Housing Department shall be entitled to recover, in addition to any other relief recovered, a reasonable sum as determined by the court for attorney's fees and costs of litigation.

- 7.6 Incorporation of Recitals. All of the recitals hereof are incorporated by this reference and are made a part hereof as though set forth at length herein.
- 7.7 Choice of Law, Forum. This Restriction and each and every related document, are to be governed by and construed in accordance with the laws of the State of Wyoming. The parties agree that the appropriate court in Teton County, Wyoming and/or the Ninth Judicial District for the State of Wyoming shall have sole and exclusive jurisdiction over any dispute, claim, or controversy which may arise involving this Restriction or its subject matter. Declarant by accepting a deed for the Residential Unit hereby submits to the personal jurisdiction of any such court in any action or proceeding arising out of or relating to this Restriction.
- 7.8 Severability. Each provision of this Restriction and any other related document shall be interpreted in such a manner as to be valid under applicable law; but, if any provision, or any portion thereof, of any of the foregoing shall be invalid or prohibited under said applicable law, such provision shall be deemed modified to the extent necessary and possible to render it valid and enforceable, or if such modification is not possible, such provision shall be ineffective to the extent of such invalidity or prohibition without invalidating the remaining provision(s) of such document.
- 7.9 Section Headings. Paragraph or section headings within this Restriction are inserted solely for convenience or reference, and are not intended to, and shall not govern, limit, or aid in the construction of any terms or provisions contained herein.
- 7.10 Waiver. No claim of waiver, consent, or acquiescence with respect to any provision of this Restriction shall be valid against any party hereto except on the basis of a written instrument executed by the parties to this Restriction. However, the party for whose benefit a condition is inserted herein shall have the unilateral right to waive such condition.
- 7.11 Indemnification. Declarant shall indemnify, defend, and hold JTCHA, the Housing Department, and Town of Jackson, Wyoming, and each entity's directors, officers, agents, and employees harmless against any and all loss, liability, claim, or cost (including reasonable attorneys' fees and expenses) for damage or injury to persons or property from any cause whatsoever on or about the Residential Unit, or for Declarant's breach of any provision of this Restriction. Declarant waives any and all such claims against JTCHA, the Housing Department and Town of Jackson, Wyoming.
- 7.12 Successors and Assigns. This Restriction shall be binding upon, and inure to the benefit of, the parties hereto and their respective successors, heirs, devisees, administrators, and assigns.
- 7.13 Governmental Immunity. Neither Town of Jackson, Wyoming nor the JTCHA or Housing Department waives governmental immunity by executing this Restriction, and each specifically retain immunity and all defenses available to either of them as government pursuant to Wyoming Statutes Ann. § 1-39-104(a) and any other applicable law.

IN WITNESS WHEREOF, Declarant has executed this instrument on the Effective Date.

OWNER:

Christina Frey

Kevin Doyle

STATE OF WYOMING)
) ss.
COUNTY OF TETON)

On the _____ day of _____ 2026, the foregoing Restriction was acknowledged before me by Christina Frey, as owner of 440 West Kelly Unit 12.

Witness my hand and official seal.

(Seal)

Notary Public

STATE OF WYOMING)
) ss.
COUNTY OF TETON)

On the _____ day of _____ 2026, the foregoing Restriction was acknowledged before me by Kevin Doyle, as owner of 440 West Kelly Unit 12.

Witness my hand and official seal.

(Seal)

Notary Public

TOWN OF JACKSON

Arne Jorgensen Mayor

STATE OF WYOMING)
) ss.
COUNTY OF TETON)

On the _____ day of _____ 2026, the foregoing Restriction was acknowledged before me by Arne Jorgensen as Mayor of Town of Jackson.

Witness my hand and official seal.

(Seal)

Notary Public

ATTEST:

Marisa N. Watsabaugh, Town Clerk



Tanya Anderson
Town of Jackson

July 9, 2026

Dear Tanya,

Congratulations! The Teton Conservation District (TCD) Board of Supervisors voted to support the Memorandum of Agreement (MOA) Request submitted by **Town of Jackson** in the total amount of **\$22,000.00**. Please refer to the Approved Annual Budget on the second page of this Award Letter for further detail on grant funds awarded for each Project and Deliverable. **Grant funds will be awarded as a reimbursement(s).**

By signing on the following page, you are signifying you agree to the following grant requirements:

1. **Funding Purpose:** Grant funds are only to be used for the purpose(s) described in the Annual Request, Approved Annual Budget, and conditions of this letter.
2. **Reimbursement Requests:** The grantee can submit *no more than two* Reimbursement Requests to TCD annually. Reimbursement Requests must be submitted no later than **June 1, 2027**.
3. **Accounting:** All grantees are required to maintain complete and accurate accounting records relating to the awarded grant funds and permit TCD, at its request, to have reasonable access to the grantee's accounting records for the purpose of making verifications concerning the grant. Grantees may be selected at random for a grant audit by TCD or a third party.
4. **Unused Funds:** Awarded funds that cannot be expended by the MOA partner by **June 1, 2027** will be released to TCD for other uses.
5. **Reporting:** The grantee's Final Report deadline is **June 1, 2027**.
6. **Recognition:** Recognize TCD in all publicity related to the funded project(s). [Please read the Communications Guidelines for Grant Recipients](#). If you have social media, TCD asks that grantees tag TCD in any project-related social media content.

Please complete, sign, and return all pages of award letter within two weeks. You may sign the document digitally or scan a signed copy and return it by email to cam@tetonconservation.org. You may also return a hardcopy to: Teton Conservation District c/o Cam Bahnsen, PO Box 1070, Jackson, WY 83001. Please retain a copy of the signed letter for your records. We look forward to seeing your completed project.

Sincerely,

Carlin Girard, Executive Director

APPROVED ANNUAL BUDGET					
Project ID	P.D.	Projects & Deliverables	TCD Grant Funds Awarded	Total Grantee & Partner Match	TOTAL
TOJ_FY27_M01	1.0	Water Quality Monitoring			
	1.1	Data from WWTP end of pipe samples	\$2,000.00	\$2,000.00	\$4,000.00
		Project 1 Subtotal	\$2,000.00	\$2,000.00	\$4,000.00
TOJ_FY27_M02	2.0	Irrigation Improvements			
	2.1	"Smart" irrigation systems – Town properties	\$8,000.00	\$10,000.00	\$18,000.00
	2.2	Water efficiency public outreach	\$2,000.00	\$2,000.00	\$4,000.00
		Project 2 Subtotal	\$10,000.00	\$12,000.00	\$22,000.00
TOJ_FY27_M03	3.0	Karns Ecological Monitoring			
	3.1	Karns Ecological Monitoring	\$10,000.00	\$40,000.00	\$50,000.00
		Project 3 Subtotal	\$10,000.00	\$40,000.00	\$50,000.00
		TOTAL	\$22,000.00	\$54,000.00	\$76,000.00

Approved Project Budget Notes:

- *Unless otherwise approved by the TCD Board, TCD awards funding for up to 50% of the total Project budget. In other words, TCD requires that grantees and their other partners match or exceed TCD's funding contribution with either direct dollar and/or in-kind contributions for each Project.*
- *If more than 15% of the Project budget amount is being moved from one Deliverable line item to another, written permission by TCD is required. For adjustments of less than 15% from one Deliverable to another (within the same project), permission from TCD is not required, though open communication is appreciated. There is a limit of one adjustment per Project year.*

GRANTEE REPRESENTATIVE CONTACT INFORMATION	
MOA Entity Name:	Town of Jackson
MOA Entity Representative: <i>The person responsible for managing the grant and final reporting.</i>	Tanya Anderson
Representative Email:	tanderson@jacksonwy.gov
Representative Phone:	307-734-4419

GRANTEE SIGNATURE			
<i>By signing below, I accept the terms of this grant as outlined in this Award Letter. Failure to do so will result in forfeiture of the grant and/or return of any funds disbursed to the applicant.</i>			
Signature of Grantee Representative		Date	
Signature of 2nd Grantee Representative*		Date	

*A 2nd Grantee Representative is not required. We provide this space for those entities that require two signatories to receive grant funds.

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Internal Services	Presenter:	Roxanne Robinson
Agenda Item:	Updates to Drug and Alcohol Policy Addendums	Public Comment:	Yes

Purpose or Policy Considerations.

The purpose of this item is for Town Council to approve updates to drug and alcohol testing policies and addendums. These updated addendums are being presented concurrently with the Policy Manual updates. No substantive policy changes are being made, these are administrative updates to keep the addendums current and compliant with either federal requirements or state regulatory compliance.

Recommendations.

Staff recommends Council approve the updated addendums to all three drug and alcohol testing policies as presented. The updates are administrative in nature, required to maintain compliance with federal DOT regulations and the Wyoming Worker's Compensation Drug Free Workplace program, and have been reviewed by staff.

Background.

The Town is required by federal Department of Transportation regulations to maintain drug and alcohol testing policies in place for all Commercial Driver's License (CDL) holders. Because the Town has CDL holders operating under two different agencies, the U.S. Department of Transportation's Federal Motor Carrier Safety Administration (FMCSA) for Public Works and the U.S. Department of Transportation's Federal Transit Administration (FTA) for START Transit, the Town maintains two separate policies, one for each group of drivers.

In addition to the federally required policies, the Town has voluntarily maintained and enforced a Drug-Free Workplace policy since approximately 2007. This policy applies to all Town employees and serves two purposes: it qualifies the Town for a 10% discount on Wyoming Worker's Compensation premiums, saving approximately \$29,000 annually, and it meets a state requirement for employees in victim services positions.

The three addendums before Council today update each addendum in three specific ways; they reflect the current year, provide an updated resource list, and update the list of positions authorized to make timely decisions for post-accident testing to reflect current staffing.

Analysis & Key Questions.

These addendum updates are administrative and routine. The Town has maintained these policies for many years and the updates before Council today do not change any policies, testing requirements, procedures, or employee obligations. The changes are limited to updating the year, refreshing the resource list, and reflecting current staffing in the post-accident decision-maker list.

Failure to maintain current and compliant addendums could jeopardize the Town's participation in the Wyoming Worker's Compensation Drug Free Workplace program, which would result in a loss of approximately \$29,000 in annual premium savings. It could also create compliance exposure under federal DOT regulations for the Town's CDL-holding employees.

Upon Council adoption, employees will be provided the updated addendums.

Key Policy Question #1. Does the Town Council support the updated addendums to all three drug and alcohol Policies as presented?

Staff recommends yes. The updates are administrative, compliance-driven, and have no fiscal cost. Approving them maintains the Town's legal compliance and preserves significant annual savings. The current drug and alcohol policies and addendums remain in place and effective until changed.

Possible Alternatives.

The first alternative is to delay approval and request additional information on specific addendums or requirements. The current policies remain in effect until changed, so a delay does not create an immediate compliance gap. However, maintaining outdated addendums creates risk, if the addendums reference incorrect staffing or resources, they may not function as intended in a post-accident situation. Staff does not recommend delay as the updates are straightforward and staff is confident in their accuracy.

The second alternative is to decline to approve one or more of the addendums. Declining the DOT addendums would not immediately void the underlying policies but could create federal compliance exposure for the Town's CDL program. Declining the Drug Free Workplace addendum could jeopardize the Town's participation in the Wyoming Worker's Compensation discount program, resulting in a loss of approximately \$29,000 in annual savings. Staff does not recommend this alternative.

Comprehensive Plan & Priority Alignment.

The ability of the Town of Jackson to implement and take actions aligned with the Comprehensive Plan depends on the ability to recruit and retain an effective workforce and comply with state and federal requirements. Establishing policies that create a positive working environment that leads to recruitment and retention of employees is aligned with Common Value #3, Quality of Life, and directly relates to Section 8, Quality Community Service Provision.

Fiscal Impact.

The fiscal impact associated with continued participation in the Drug Free Workplace testing policy is a savings to the Town of approximately \$29,000 annually.

Staff Impact.

The staff impact of updating the addendums to the drug and alcohol testing policies has been approximately 5 hours and will also include a negligible amount of time distributing and posting the updated addendums.

Attachments or Links.

- Updated addendums to the Wyoming Worker's Compensation Drug Free Workplace Policy
- Updated addendum to the Department of Transportation Federal Motor Carrier Safety Administration Drug and Alcohol Policy
- Updated addendum to the Department of Transportation Federal Transit Administration Drug and Alcohol Policy

Suggested Motion.

I move to approve the updated addendums to the Wyoming Worker's Compensation Drug Free Workplace Policy, the U.S. Department of Transportation's Federal Motor Carrier Safety Administration Drug and Alcohol Policy, and the U.S. Department of Transportation's Federal Transit Administration Drug and Alcohol Policy as presented in the staff report dated August, 3, 2026.

Town of Jackson Drug Free Workplace Policy

Addendum A: Policy Addendum

For Fiscal Years 2027 and 2028 (July 2026 – June 2028):

Designated Employer Representative (DER): Ann McClure, Transit Coordinator, Phone: (307) 733-4521 ext. 1652 or Email: amcclure@jacksonwy.gov

Alternate DER: Amy Renova, Public Works Department Administrative Assistant
Phone: 307-733-3079 ext. 1403 or Email: arenova@jacksonwy.gov

Medical Review Officer (MRO): Dr. F. Proano, MD. See the chain of custody testing forms for current contact and address information.

Substance Abuse and Mental Health Services Administration (SAMHSA) Testing Lab: Clinical Reference Laboratory

Third Party Administrator: R&A Safety – 901 Coburn Ave, Worland, Wyoming 82401
Phone: Tammy DeCroo (307) 347-2882 Email: tammy@randasafety.com

Employee Education Information Available:

- What Employees Need To Know About Department of Transportation (DOT) Drug & Alcohol Testing brochure
- Employee Education Supplement on the effects of drugs and alcohol

Annual Random Testing Rates: 50% drug/10% alcohol (Federal Motor Carrier Safety Administration (FMCSA) & Federal Transit Administration (FTA) combined testing pool)

DOT urine specimens are analyzed for the following drugs or drug metabolites:

- ◆ Marijuana metabolites / THC
- ◆ Cocaine metabolites
- ◆ Phencyclidine [PCP]
- ◆ Amphetamines and Methamphetamine
- ◆ Opiate metabolites [including Ecstasy, Codeine, Morphine, and Heroin]
- ◆ Semi-synthetic opioids [including Hydrocodone, Oxycodone, Hydromorphone; Oxymorphone]

Note: Any changes to the Federal Regulations regarding the required test panel will be effective immediately and may include an expansion of the above-listed drugs and their metabolites as specified.

Nat. Institute For Drug Abuse:
<http://nida.nih.gov>

Alcoholics Anonymous Website:
<http://www.aa.org/the-big-book>

DEA's Drug Fact Sheets:
<http://www.dea.gov/factsheets>

Treatment Center Locator:
<http://www.samhsa.gov/find-help/locators>

Substance Abuse and Mental Health Services Administration National Helpline:
1-800-662-4357

Substance Abuse and Mental Health Services Administration:
<http://www.samhsa.gov/find-help/helplines/national-helpline>

Programs, People, Entities and Organizations Designed to Assist Employees with Personal or Behavioral Problems

Mental Health & Recovery Services of Jackson Hole
(307) 733-2046
<http://www.mentalhalthandrecoveryjh.org>

Mental Health & Recovery Services of Jackson Hole
Substance Use Treatment
(307) 733-3908
<http://www.mentalhalthandrecoveryjh.org>

St John's Health Outpatient Behavioral Health
(307) 203-7880
<https://www.st.johns.health/services/behavioral-health>

Medicine Wheel Wellness
Decision making and conflict resolution, behavioral therapy, positive psychology, solution focused therapy, evolutionary psychology, dialectic behavior therapy
(307) 413-8364
<http://mwwjh.com>

Teton Wellness Affiliates
ADHD, Anxiety, Depression, Divorce, Self Harmful Behaviors, Trauma and Other Common Mental Health Struggles. Parent and Child Consultation, Individual Psychotherapy, Parenting Workshops, and School Advocacy
(307) 690-3180
<http://www.teton-wellness.com>

Other Counseling Resources & Info.:
Curran-Seeley Foundation
733-3908 - Jackson

Mental Health & Recovery Services of Jackson Hole
733-2046 – Jackson

High Country Behavioral Health
885-9883 – Star Valley, WY

Nat. Council On Alcoholism & Drug Dependence, Inc. – NCADD
<http://ncaddnational.org>

Alcoholics Anonymous Website:
<http://www.aa.org>

<https://www.aa-meetings.com>

Name	Address	Location
Jackson Group	139 N Cache St	Jackson, Wyoming, 83001
Jackson Group – Online	139 N Cache St Online	Jackson, Wyoming, 83001
Primary Purpose	750 Seneca Ln	Jackson, Wyoming, 83001
Wilson AA	5655 Main St	Wilson, Wyoming, 83001
Jackson Womens Meeting	139 N Cache St	Jackson, Wyoming, 83001
Zoom Women's Mtg	Online	Jackson, Wyoming
Wilson Hybrid Womens AA	5655 Main St	Wilson, Wyoming, 83014
Zoom-Wilson	Online	Wilson, Wyoming
Victor Friday Night AA	1578 Buckskin Loop	Victor, Idaho, 83455
Alpine AA	156 Morning Star Dr	Alpine, Wyoming, 83128

Marijuana Anonymous:
<http://www.marijuana-anonymous.org/>

U.S. Department of Transportation
Office of Drug & Alcohol Policy & Compliance
What Employees Need to Know About DOT Drug and Alcohol Testing
Link to Employee Handbook [Here](#)

2026-2028 Annual Listing of Positions and
Supervisors With Authority to Make Timely
Determination for Post-Accident Tests:

2026 - 2028 Annual Listing for Timely Determinations for Post Accident Tests	
Position	Supervisors With Authority to Make Timely Determination for Post Accident Tests
Senior Staff	
Town Manager	Deputy Town Manager, Chief of Police, Director of Internal Services
Deputy Town Manager	Town Manager, Chief of Police, Director of Internal Services
Director of Internal Services	Chief of Police, Town Manager, Deputy Town Manager
Town Attorney, Municipal Judge	Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Chief of Police	Director of Internal Services, Town Manager, Deputy Town Manager
Planning and Building Director, Director of External Affairs, Public Works Director, Finance Director, Transit Director, Information Technology Manager	Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Public Works	
Assistant Public Works Director, Town Engineer, Fleet Manager, Streets Manager, Water Utility Manager, Wastewater Manager, Facilities Manager	Public Works Director, Director of Internal Services, Town Manager, Deputy Town Manager
Administrative Assistant, Associate Engineer, Senior Journey Mechanic, Journey Mechanic, Equipment Operators, Street Operators, Cemetery Sexton, Water Utility Operators, Utility Locator, Meter Reader, Wastewater Treatment Plant Operators, Collection System Operators	Town Engineer, Fleet Manager, Streets Manager, Water Utility Manager, Wastewater Manager, Facilities Manager, Public Works Director, Director of Internal Services, Town Manager, Deputy Town Manager
Legal	
Paralegal, Assistant Town Attorney	Town Attorney, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Planning and Building	
Building Official	Planning and Building Director, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Planners, Building Inspector, Development Coordinator, Planning Coordinator	Building Official, Planning and Building Director, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Police	
Lieutenant	Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Sergeant	Lieutenant, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Police Technology Manager, Police Systems Administrator, Corporal, Police Officer, Police Social Worker, Evidence Technician, Community Service Officer, Victim Services Coordinator, Victim Services Advocate, Administrative Coordinator, Kennel Technician	Sergeant, Lieutenant, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Finance	
Finance Manager	Finance Director, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Deputy Treasurers, Municipal Court Clerks, Office Clerk	Finance Manager, Finance Director, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Municipal Court	
Municipal Court Clerk, Deputy Court Clerk	Finance Director, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Personnel/Town Clerk	
Town Clerk, Human Resources Specialist, Internal Services Specialist, Administrative Assistant	Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
External Affairs Department	
Public Information Officer	Director of External Affairs, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Administration	
Ecosystem Stewardship Administrator	Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager
Transit	
Transit Operations Manager	Transit Director, Director of Internal Services, Town Manager, Deputy Town Manager
Transit System Supervisor/Dispatcher, Transit Safety and Training Coordinator, Transit Coordinator, Transit Service and Operations Planner	Transit Operations Manager, Transit Director, Director of Internal Services, Town Manager, Deputy Town Manager
Transit Operator	Transit System Supervisor/Dispatcher, Transit Safety and Training Coordinator, Transit Operations Manager, Transit Director, Director of Internal Services, Town Manager, Deputy Town Manager
Information Technology	
Systems Architect, IT Systems and Support Engineer, Cybersecurity Engineer, Police Technology Manager, Police Systems Administrator, Administrative Assistant	Information Technology Director, Chief of Police, Director of Internal Services, Town Manager, Deputy Town Manager

Department of Transportation (DOT) Federal Motor Carrier Safety Administration (FMCSA)

Addendum A: Policy Addendum

For 2026 – 2028

Designated Employer Representative (DER): Ann McClure, START Coordinator, Phone: (307) 733-8651 ext. 1652 or Email: amcclure@jacksonwy.gov

Alternate DER: Amy Renova, Public Works Department Senior Administrative Assistant
Phone: 307-733-3079 ext. 1403 or Email: arenova@jacksonwy.gov

Director of Internal Services: Roxanne Robinson, Director of Internal Services
Phone: 307-734-3481 or Email: rrobinson@jacksonwy.gov

Medical Review Officer (MRO): Dr. F. Proano, MD. See the chain of custody testing forms for current contact and address information.

(Substance Abuse and Mental Health Services Administration) SAMHSA Testing Lab: Clinical Reference Laboratory (CRL)

Third Party Administrator: R&A Safety, LLC – 901 Coburn Ave, Worland, Wyoming 82401
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<http://nida.nih.gov>

Alcoholics Anonymous Website:
<http://www.aa.org/the-big-book>

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Treatment Center Locator:
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Substance Abuse and Mental Health Services
 Administration National Helpline:
 1-800-662-4357

Substance Abuse and Mental Health Services
 Administration:
<http://www.samhsa.gov/find-help/helplines/national-helpline>

2026 - 2028 Listing of Covered Positions:

*ALL commercial vehicle drivers employed by the Town of Jackson not covered under the Federal Transit Administration (FTA) – including regular and intermittent/seasonal who are required to hold a Commercial Driver's License (CDL)

Department of Transportation (DOT)

Federal Transit Administration (FTA)

Addendum A: Policy Addendum

For 2026 - 2028:

Designated Employer Representative (DER): Ann McClure, START Coordinator, Phone: (307) 733-8651 ext. 1652 or Email: amcclure@jacksonwy.gov

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DEA's Drug Fact Sheets:

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Treatment Center Locator:

<http://www.samhsa.gov/find-help/locators>

Substance Abuse and Mental Health Services

Administration National Helpline:

1-800-662-4357

Substance Abuse and Mental Health Services

Administration:

<http://www.samhsa.gov/find-help/helplines/national-helpline>

2026 -2028 Annual Listing of Covered Positions:

*ALL revenue service vehicle drivers employed by the Town of Jackson – regular and intermittent/variable hour/seasonal

*Transit Operations Manager

*Transit Safety and Training Coordinator

*Transit System Supervisor/Dispatchers

*Designated Town of Jackson mechanics whose duties require them to perform at least 50% of their duties associated with driving, repairing, and maintaining revenue service vehicles

At present, there are no armed officers or staff employed by the Town of Jackson for the purposes of providing FTA security duties.

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Public Works	Presenter:	Brian Lenz
Agenda Item:	<i>Sewer Services & Connection Request – South Park Landing RV Dump Station (E26-0136)</i>	Public Comment:	Yes

Purpose or Policy Considerations.

The purpose of this item is for Council to consider the approval of a request for services outside the Town from Teton County (Applicant) to connect the proposed South Park Landing Recreational Vehicle Dump Station (Connection) located at 5475 South Highway 89 to Town sewer collection and treatment services via the Teton County School District's (TCSD) existing Munger School wastewater conveyance system.

Recommendations.

Staff recommend the Council approve the request for sewer collection and treatment services for the South Park Landing RV Dump Station subject to the conditions of approval set forth in this report.

Background.

Following approval of the Connection by the Teton County School District at their June 10, 2026 meeting, Teton County applied to the Town of Jackson to request approval for the Connection to the Town's collection and treatment systems via TCSD's existing sewer conveyance system. The Connection is located outside of the Town's corporate limits, south of the Town of Jackson, and will be incorporated into the TCSD's Service Area. Teton County will be a Connectee of TCSD, not a direct Town customer.

Proposed Development

The proposed development is a Recreational Vehicle (RV) Dump Station that is being constructed by Teton County on US Bureau of Land Management Parcel 26. The area is commonly known as South Park Landing West Park, with a street address of 5475 South Highway 89. The facility is intended to serve recreational vehicles only and will provide a controlled, accessible, and environmentally responsible location for RV wastewater disposal. The proposed facility directly supports recommendations identified in the Teton County 2024 Water Quality Management Plan which identifies development of additional RV dump stations as an immediate need and high priority mitigation strategy to improve regional water quality.



Figure 1 – Teton County's South Park Landing RV Dump Station Project

The proposed RV dump station is anticipated to generate an average daily wastewater flow of approximately 3,000 gallons per day (GPD), based on an estimated 30 RVs per day at 100 gallons per RV per day based on Wyoming Water Quality Rules and Regulations, Chapter 25.

Town Process for Sewer Service Requests

The Town's three-step connection process was established by Resolution 21-28 on November 15, 2021. Under that process, the Council first approves a request for services, then the Council approves the Connection and Use Agreement, and lastly, staff approves permits for construction.

Analysis & Key Policy Questions.

Staff reviewed this request against the eight factors established by Resolution 21-28. All eight factors support approval. The key findings are summarized below.

Staff have considered the following factors in recommending their approval:

- A. Existing Versus New Development
Staff find that the proposed connection is for new development.
- B. Expanded Service Area and Capacity Timeline
Staff find that this request is from outside the Capacity Study area and will reduce the future capacity timeline for the treatment plant and other necessary upgrades.
- C. Zoning Consistent with Comprehensive Plan
Staff find that the application is being developed on federally owned land by a county agency. Because the development is a governmental use on federal land, standard Comprehensive Plan consistency review does not apply in the same manner as a private development application. The proposed facility directly supports recommendations identified in the Teton County 2024 Water Quality Management Plan.
- D. Deed Restricted And/or Workforce Housing
Staff find that no deed restricted or workforce housing is associated with the application. Though, the station could be used by people using RVs for their housing.
- E. Potential For Reduced Environmental Impact
Staff find that the proposed connection will have a positive impact on water quality as the connection will convey wastewater to the Town's treatment plant, rather than using an onsite treatment and septic system.
- F. Geographical Location
Staff find that the Connection is located within 50 feet of an existing sewer main.
- G. Magnitude of the Request
Staff find the magnitude of this request is minor relative to the capacity of the Town's system.
- H. Costs To Upgrade and Impacted User Classes
Staff find that the proposed connection costs of improvements and upgrades will be borne by the applicant and at no cost to the current rate payers. The new infrastructure will be designed, constructed, operated, and maintained by the Applicant.

Conditions of Approval

If this request for service is approved by the Council at this initial step, staff recommend the following conditions of approval:

- A. Approval is for a Recreational Vehicle Dump station with estimated maximum day volumes of 3,000 gpd. The final approved volume in the Connection and Use Agreement may decrease but shall not exceed 3,000 gpd without additional approval.

- B. The Connection shall be one Connectee of the TCSD according to the connection and use agreement between the Town and TCSD.
- C. The Applicant shall provide a Letter of Consent from TCSD for making this application to request services.
- D. Prior to finalizing the Connectee Connection and Use Agreement, any amendments to the TCSD agreement with the Town must be made.
 - a. Applicant or TCSD shall provide wastewater strengths of RV waste versus septic waste to determine if revisions to the prohibition on septic dumping need to be approved.
 - b. Applicant or TCSD shall provide updated average day, maximum day, peak pumping rates, and peak discharges for the TCSD system, including all approved service areas. Volume basis shall be from the Town's municipal code for capacity fees where applicable.
 - c. Applicant or TCSD shall satisfactorily address all items of concern, conditions, requests, etc. included in the letter from Matt Ostdiek at Rendezvous Engineering to Amy Ramage at Teton County Engineering dated July 21, 2026.
- E. Prior to construction of any infrastructure or service connecting to the Town systems and prior to connecting to any party already connected to Town systems, permits for the construction of said infrastructure must be issued by the Town.
- F. Applicant shall be responsible for all costs to design, permit, and construct upgrades determined necessary within or to the Town's systems associated with services for the development.

When additional services are connected to the Town's sewer systems, there is a cumulative impact on the Town's operation and maintenance costs for the wastewater collection and treatment systems and reductions in the Town systems' remaining capacities.

- Key Question 1: Does Council find that the eight review factors established by Resolution 21-28 support approving the request for sewer service for the South Park Landing RV Dump Station, subject to the conditions of approval?

Staff recommends yes. All eight factors support approval. The RV dump station provides a controlled, environmentally responsible facility for recreational vehicle wastewater disposal, directly supports the Teton County Water Quality Management Plan's recommendations, has a minor impact on Town system capacity, and imposes no costs on existing ratepayers.

- Key Question 2: Does Council support approving the Connection and Use Agreement and waiving the application and processing fees given that this is a governmental applicant receiving public funding?

Staff recommends yes on both. The Connection and Use Agreement has been reviewed by the Town Attorney and Town Engineer. The fee waiver is consistent with Town policy for governmental entities.

Possible Alternatives.

Alternative 1: The Council may choose to modify the conditions of approval before approving the request. The Council could adjust any of the conditions, including the maximum wastewater volume, metering requirements, or fee arrangements, if different terms are warranted. Staff would incorporate any Council-directed changes before executing the Connection and Use Agreement.

Alternative 2: The Council may choose to deny the request. Denial would require the Applicant to pursue an on-site septic system or holding tank and haul system. Staff do not recommend denial, an on-site system in this location carries greater environmental risk to water quality than connecting to the Town's treatment plant, and all eight review factors support approval.

Alternative 3: The Council may choose to defer the decision to a future meeting. Staff does not recommend deferral as the application is complete, all eight considerations have been evaluated. The facility is intended to address an identified water quality need and deferral delays that benefit without a corresponding advantage.

Comprehensive Plan & Priority Alignment.

This project relates to the Town Comprehensive Plan Common Value #1- Ecosystem Stewardship.

Common Value #1 – Ecosystem Stewardship

- Principle 1.2- Preserve and enhance water and air quality
 - Policy 1.2.c: Monitor and maintain water quality – *calls for monitoring cumulative impacts on water quality and the effectiveness of mitigation efforts and strive to exceed State and Federal requirements for quality and monitoring to enhance water quality in the area.*

Connecting the South Park Landing RV Dump Station to the Town's treatment plant rather than allowing an on-site septic system directly advances this policy by reducing the risk of groundwater contamination in an area outside Town limits where water quality monitoring and septic oversight are more limited.

The Council should be aware that each approval of outside-limits sewer service reduces the Town's treatment plant capacity and accelerates the timeline for costly infrastructure upgrades. The magnitude of this specific connection is minor and the applicant bears all connection costs, but the cumulative impact of outside-limits connections is a real long-term fiscal and infrastructure consideration. Council should weigh this as it evaluates the full pattern of such requests.

Fiscal Impact.

Typically, the Town charges a \$640 application fee for sewer service requests located in the County, and a \$155 per hour rate for staff time, as described in Condition of Approval 5. This is a Teton County project and qualifies for a fee waiver based our resolution with the County.

A capacity fee will be collected prior to connection, determined by the fees established in the Municipal Code at the time of the permit application. The ongoing fiscal impact thereafter is the wastewater usage fees paid to the Town. The fee amounts are set forth in Title 13 of the Jackson Municipal Code.

Staff Impact.

Total estimated staff time across all three steps is 26 to 34 hours, broken out as follows.

Step 1: Staff time during Step 1 is approximately 12 hours between Public Works, Legal, and Administration staff.

Step 2: CUA for Sewer Services will have the following impacts:

- CUA Agreement Drafting: 1-4 hours for Administration, 6-10 hours for Legal, and 6-10 hours for Public Works, for a total of 13-24 hours.
- Agreement Finalization and Recording: 2 Hours for Public Works.

Step 3: SWP Connection Permits for a connection typically take 4-8 hours for Public Works.

In addition, staff notes that when additional services are connected to the Town's systems, there is a cumulative impact on the Town's operation and maintenance personnel for wastewater collection and treatment systems.

The impact to the Town of providing wastewater service at this time is minimal but contributes to the cumulative impact to Public Works staff who maintain the sewer systems, the Finance Department that handles the billing, and to the

Wastewater Treatment Plant capacity as the Town continues to connect more customers both within and outside of Town limits.

Attachments or Links.

1. Application Materials
2. July 21, 2026 Letter from Rendezvous Engineering

Suggested Motion.

I move to approve Teton County's South Park Landing RV Dump Station request for sewer collection and treatment services subject to the conditions of approval set forth in this staff report dated August 3, 2026.



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: Teton County RV Dump Station
Physical Address: Munger Mountain Road
Lot, Subdivision: BLM Parcel 26 PIDN: 22-40-16-34-3-00-011

PROPERTY OWNER.

Name: Bureau of Land Management (see letter of concurrence) Phone: 307-367-5333
Mailing Address: 1625 West Pine, PO Box 768, Pinedale WY ZIP: 82941
E-mail: tchewning@blm.gov

APPLICANT/AGENT.

Name: Chris Colligan Phone: 732-8546
Mailing Address: PO Box 3594, Jackson WY ZIP: 83001
E-mail: ccolligan@tetoncountywy.gov

DESIGNATED PRIMARY CONTACT.

_____ Property Owner ☒ _____ Applicant/Agent

TYPE OF APPLICATION. Please check all that apply; review the type of application at www.townofjackson/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:** request to connect
_____ 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 www.townofjackson.com/DocumentCenter/View/102/Town-Fee-Schedule-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.

Signature of Property Owner or Authorized Applicant/Agent

Chris Colligan

Name Printed

05-29-26

Date

Project Manager

Title



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

High Desert District
Pinedale Field Office
1625 West Pine, P.O. Box 768
Pinedale, Wyoming 82941
www.blm.gov/wy



In Reply Refer To:
2740 (WYD01)
WYWY105877782 (WYW181596)

April 30, 2026

To Whom it May Concern,

This letter serves as official concurrence from the Bureau of Land Management (BLM) regarding Teton County's intent to proceed with permitting for the proposed RV Dump Station and potable water supply at South Park Landing (BLM Parcel 26).

Project Status and Adjudication

The BLM has reached the final administrative stage for the transfer of Parcel 26 under the Recreation and Public Purposes (R&PP) Act. All major milestones; including National Environmental Policy Act (NEPA) compliance and the Notice of Realty Action (NORA), have been successfully completed. The project is currently in the post-adjudication phase and the issuance of the federal land patent is imminent, with an expected transfer of ownership this summer.

While the final patent is being processed, the BLM acknowledges that Teton County must begin multiple permitting processes to meet permitting submission goals. As the current land manager, the BLM provides this letter of support for Teton County, to garner permits, including:

- Sanitary sewer connections to the Munger Mountain main.
- Public water supply well installation and permitting.
- Highway access and site development permits.

Documentation to support Teton County's request includes:

- Decision Record
- Notice of Realty Action

These documents confirm that the United States, as the current title holder, will grant Teton County a federal land patent to ownership of the fee estate. Teton County can apply for all project-related permits once the patent is officially issued and recorded. Teton County's request is in conformance with the completed BLM Teton County R&PP NEPA documents., pending the issuance of the final patent.

If additional technical verification is required, please contact Travis Chewning, Supervisory Natural Resource Specialist at 307-367-5333.

Sincerely,


Acting For: Stewart F. Cogswell 4/30/26
Field Manager

2 Attachments

- 1- NEPA Decision Record
- 2- Notice of Realty Action

ENGINEERING



Teton County RV Dump Station Request to Connect Narrative

Project Overview and Request

This narrative is submitted in support of a Request to Connect application for the proposed Teton County RV Dump Station project. The project consists of the construction of a seasonal public recreational vehicle (RV) dump station on BLM Parcel 26, also known as South Park Landing West Park. The facility is intended to serve recreational vehicles only and will provide a controlled, accessible, and environmentally responsible location for RV wastewater disposal.

Teton County is requesting authorization from the Town of Jackson to connect the proposed RV dump station to the municipal sanitary sewer system via the Munger Mountain sewer main. The proposed facility directly supports recommendations identified in the 2024 Water Quality Management Plan and responds to Mitigation Measure H-3, which identifies development of additional RV dump stations as an immediate need and high priority mitigation strategy to improve regional water quality.

Reason for Requesting Connection

The proposed connection to the municipal sanitary sewer system is requested to provide a reliable, safe, and regulatory compliant wastewater disposal method for recreational vehicle wastewater.

Increased visitation to Teton County and nearby national parks has substantially increased RV traffic throughout the region. Existing public dump station infrastructure is insufficient to meet current demand. According to coordination with Grand Teton National Park, local law enforcement, and public works staff, illegal dumping of RV wastewater has become an increasing issue both within the Town of Jackson stormwater system and on surrounding public lands.

Grand Teton National Park currently operates three RV dump stations at:

- Gros Ventre Campground
- Shadow Mountain
- Spread Creek

No industrial, commercial process waste, petroleum products, hazardous materials, or non domestic wastewater shall be discharged to the system.

Alternatives Considered

Through preparation of the 2024 Water Quality Management Plan, Teton County Public Works evaluated multiple potential locations throughout the County for RV dump station facilities. Increasing the redundancy and geographic distribution of these facilities remains a joint Town and County priority.

Onsite Septic System

An onsite septic treatment and disposal system was considered but was not pursued due to:

- Potential groundwater and surface water concerns
- Regulatory complexity
- Long term maintenance requirements
- Soil and site limitations
- Higher environmental risk relative to connection to an existing municipal treatment system

Holding Tank and Pump Haul System

A holding tank with periodic pump hauling was also evaluated. This option was not selected because:

- It would require ongoing operational hauling costs
- Increased maintenance and operational oversight would be necessary
- Overflow and operational risks would be greater
- Long term operational sustainability would be reduced compared to a direct sewer connection

Alternative Locations

Multiple locations throughout the County were evaluated. BLM Parcel 26 was identified as a viable and strategic location due to:

- Proximity to U.S. Highway 89
- Availability of nearby sewer infrastructure
- Ability to integrate with future County park uses
- Accessibility for residents and visitors
- Opportunity for future regional service expansion

Comparable RV dump station facilities in communities such as Pinedale and Idaho Falls were reviewed as implementation models.

Proposed Schedule

The anticipated project schedule is as follows:

- Request to Connect Application Submission: Summer 2026
- Final Design and Permitting: Summer to Fall 2026
- Agency Coordination and Review: Fall 2026 through Spring 2027

- Construction: Fall 2026
- Facility Operational Date: Late 2027

The project will require coordination and permitting with multiple agencies and departments, including:

- Bureau of Land Management (BLM)
- Town of Jackson Engineering Department
- Teton County Public Works
- Jackson/Teton County Parks and Recreation
- Wyoming Department of Environmental Quality
- Teton County School District

Ownership and Responsible Entity

Teton County shall be responsible for all costs associated with engineering and design, permitting and agency approvals, construction and installation, operation and maintenance, regulatory compliance, repair and replacement of infrastructure, utility fees and connection fees, and ongoing facility management and oversight. Upon project completion, the facility is anticipated to be owned, operated, and maintained by Jackson/Teton County Parks and Recreation on behalf of Teton County.

Proposed Method of Metering

The proposed facility is anticipated to utilize an automated self pay kiosk system to manage public access and user fees.

Sewer Information

The proposed RV dump station is anticipated to generate an average daily wastewater flow of approximately 3,000 gallons per day (GPD), based on an estimated 30 RVs per day at 100 gallons per RV per day in accordance with Wyoming Water Quality Rules and Regulations, Chapter 25.

Projected wastewater characteristics are consistent with medium to strong domestic sanitary wastewater.

Anticipated Wastewater Characteristics

Average Daily Flow: 3,000 GPD (Seasonal: May 1st-October 31st)

Estimated RVs per Day: 30

Flow Per RV: 100 GPD/RV

BOD5: 220 to 400 mg/L

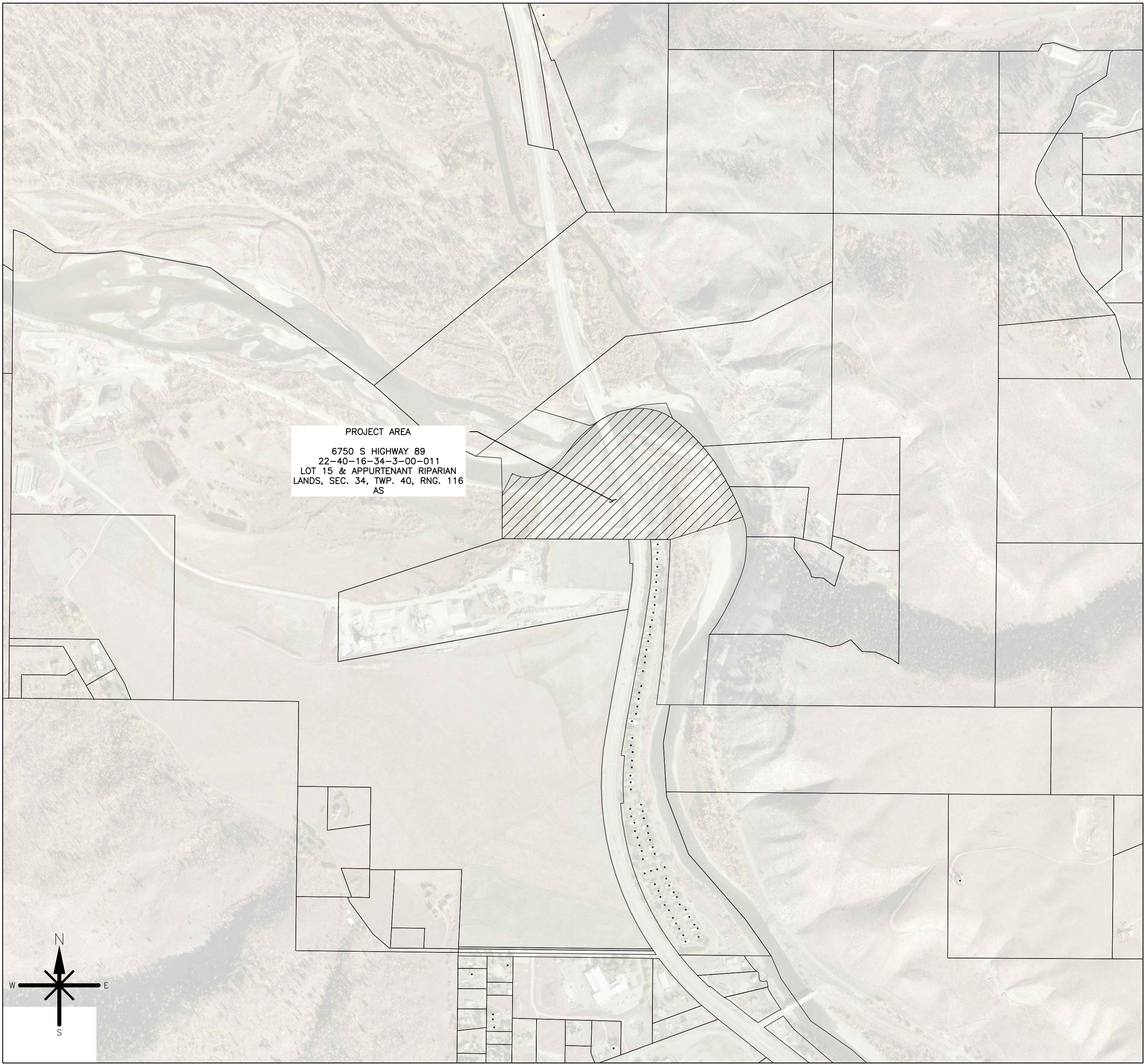
TSS: 220 to 350 mg/L

Wastewater discharged to the system shall consist solely of domestic sanitary wastewater from RV holding tanks, including blackwater and graywater.

No industrial, commercial process waste, petroleum products, hazardous materials, or non domestic wastewater shall be discharged to the system.

SOUTH PARK LANDING - WEST PARK

RV DUMP STATION | TETON COUNTY, WY



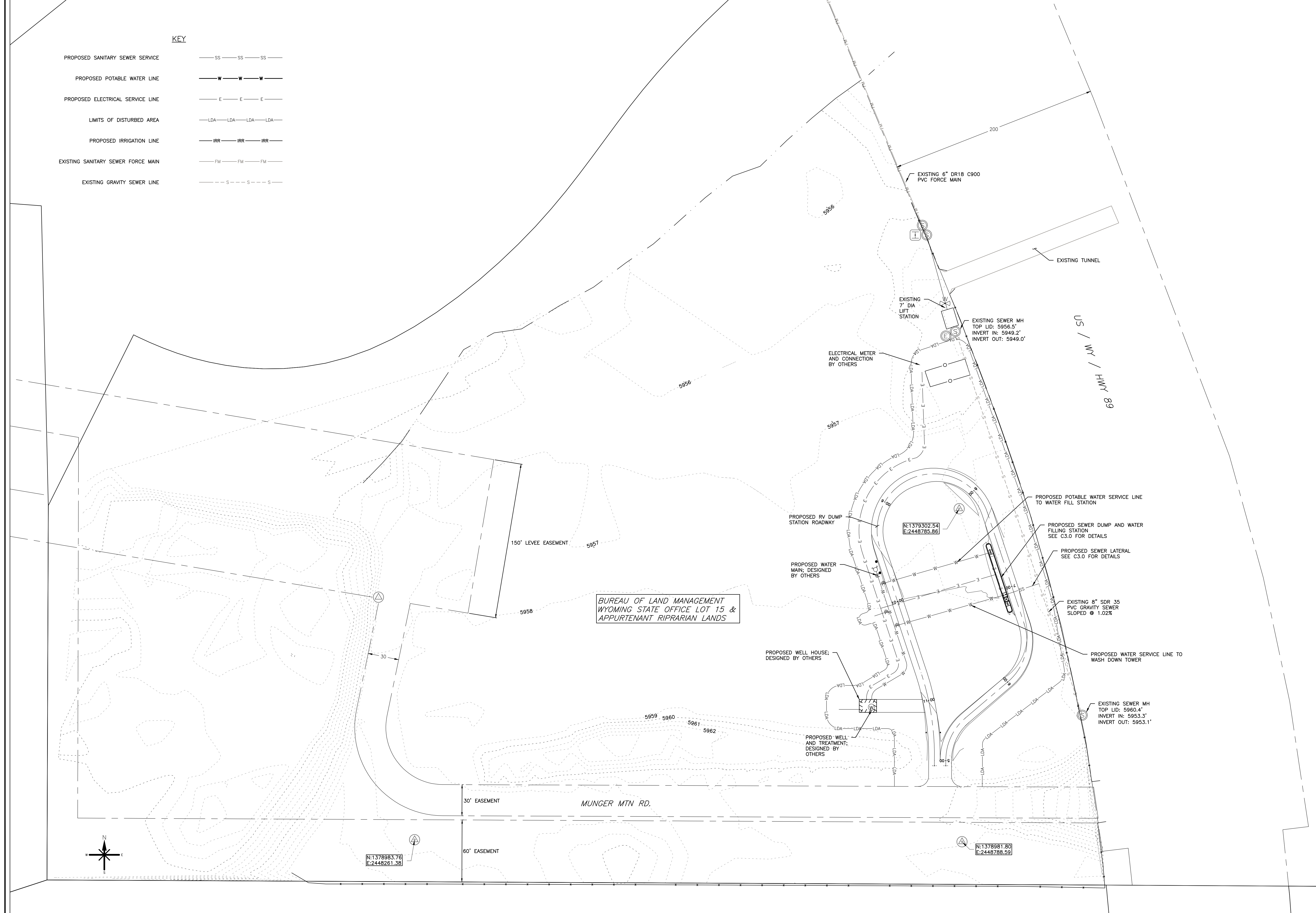
PROJECT DESCRIPTION:
CONSTRUCTION OF AN RV DUMP STATION
INCLUDING SANITARY SEWER CONNECTION,
POTABLE WATER SERVICE, SITE GRADING,
PAVING, DRAINAGE, SIGNAGE, AND
ASSOCIATED APPURTENANCES.

PROJECT CONTACTS	
OWNER	TETON COUNTY 320 S KING STREET JACKSON, WY 83001 307-734-3864
CIVIL ENGINEER SITE PLAN	TETON COUNTY PUBLIC WORKS 320 S KING STREET JACKSON, WY 83001 307-734-3864
CIVIL ENGINEER PUBLIC WATER SUPPLY	Y2 CONSULTANTS: TYLER KLOS P.O. BOX 2870 JACKSON, WY 83001 307-733-2999
SURVEY	Y2 CONSULTANTS P.O. BOX 2870 JACKSON, WY 83001 307-733-2999

PROJECT INDEX	
C1.0	COVER SHEET
C2.0	SITE PLAN
C3.0	GRADING PLAN
C4.0	UTILITY PLAN
C5.0	STANDARD DETAILS



BID SET
MAY, 2026



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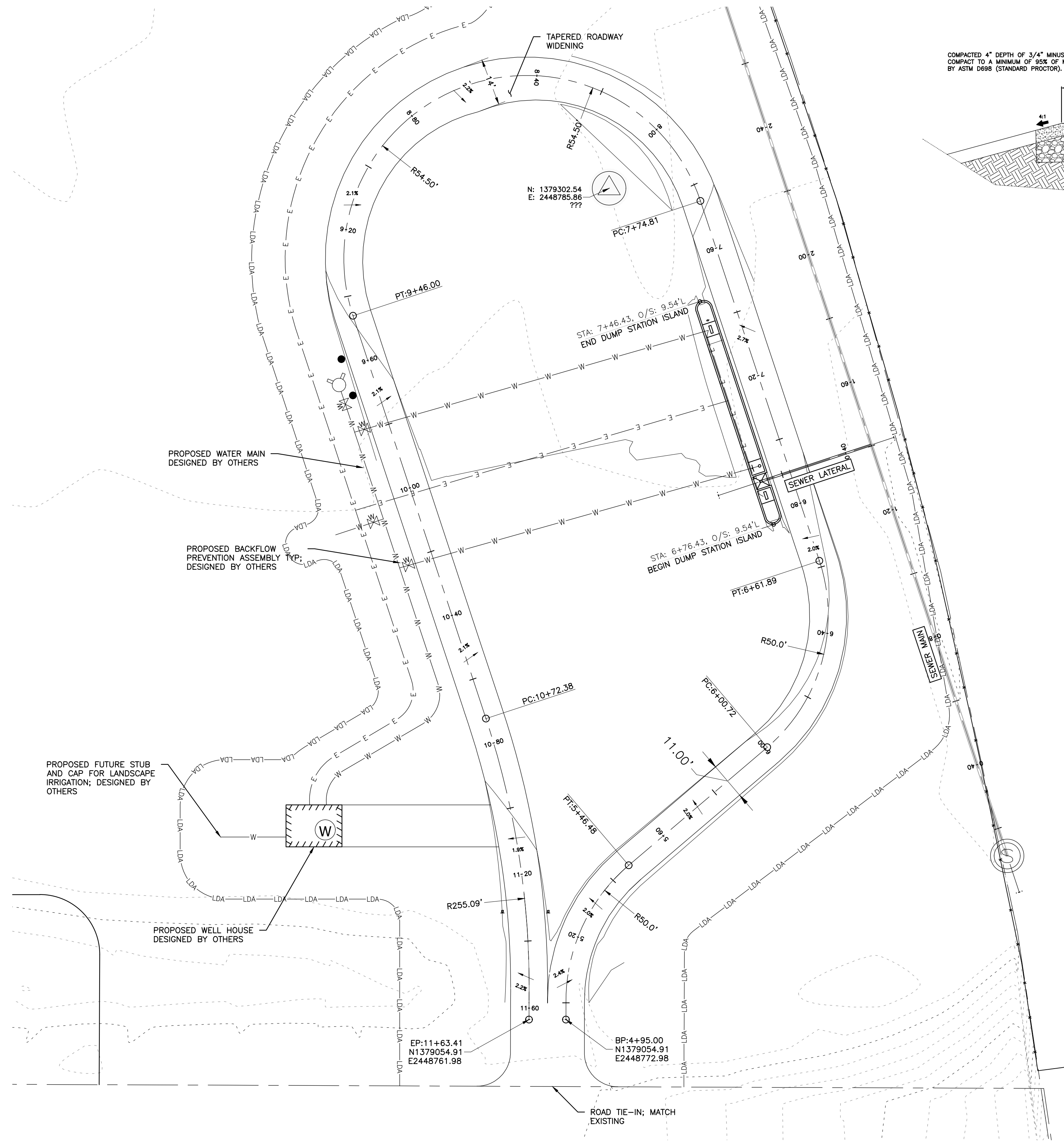
DATE:	5/11/26
DRAWN BY:	MSM
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APPROVED BY:	##
SCALE:	AS SHOWN
REVISIONS:	

DRAWING TITLE
SITE PLAN

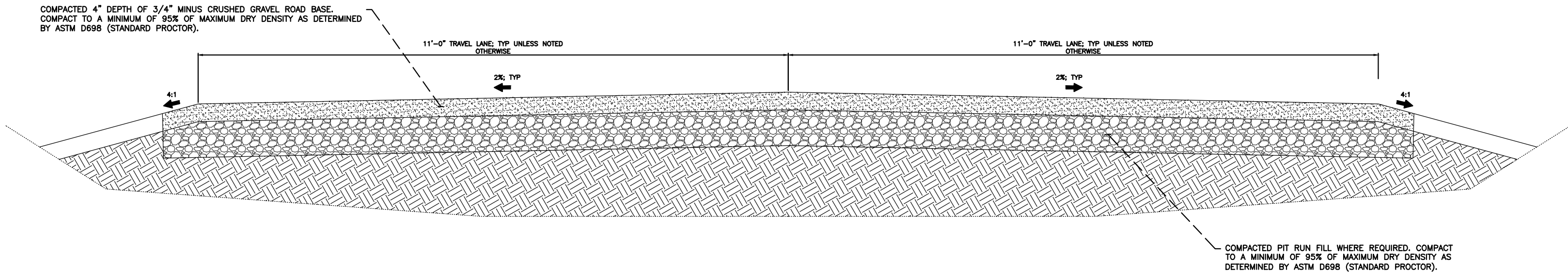
PROJECT NAME
2026 TETON COUNTY RV DUMP STATION

SHEET NUMBER:
C1.0

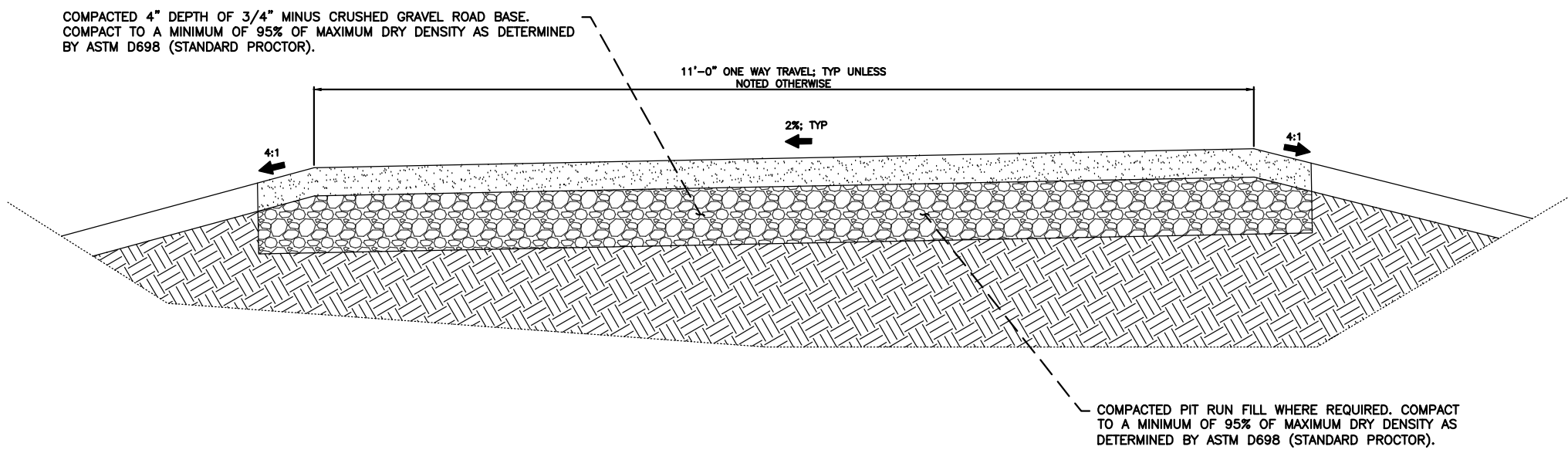
SITE PLAN
1" = 40' 24"x36" PAPER



GRADING PLAN
1" = 20' 24"x36" PAPER



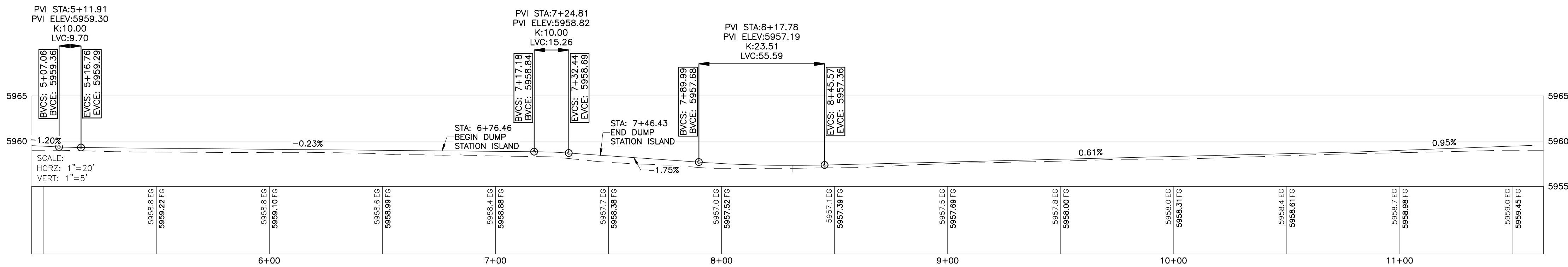
TYPICAL TWO-WAY ROAD SECTION
NOT TO SCALE



TYPICAL ONE-WAY ROAD SECTION
NOT TO SCALE

GENERAL GRADING NOTES

1. CONTRACTOR SHALL VERIFY ALL EXISTING CONDITIONS AND DIMENSIONS PRIOR TO CONSTRUCTION.
2. REMOVE ALL ORGANIC MATERIAL, VEGETATION, TOPSOIL, SOFT MATERIALS, AND UNSUITABLE SUBGRADE PRIOR TO PLACEMENT OF FILL OR ROAD BASE.
3. ALL FILL MATERIALS SHALL BE FREE OF ORGANIC MATERIAL, DEBRIS, FROZEN MATERIAL, AND ROCKS LARGER THAN 6".
4. PROOF ROLL SUBGRADE IN THE PRESENCE OF THE ENGINEER. REMOVE AND REPLACE UNSUITABLE MATERIAL AS DIRECTED BY THE ENGINEER.
5. CONTRACTOR SHALL ADD WATER OR ALLOW MATERIAL TO DRY AS NECESSARY, AS DIRECTED BY THE ENGINEER, TO ACHIEVE OPTIMUM MOISTURE CONTENT FOR SPECIFIED COMPACTION REQUIREMENTS.
6. COMPACT SUBGRADE AND FILL MATERIALS TO THE DENSITIES SPECIFIED ON THESE PLANS.
7. ALL THICKNESSES SHOWN ARE COMPACTED THICKNESSES.
8. PROVIDE POSITIVE DRAINAGE AWAY FROM ROADWAY AND IMPROVEMENTS AT ALL TIMES.
9. CONTRACTOR SHALL MAINTAIN DRAINAGE AND EROSION CONTROL MEASURES DURING CONSTRUCTION.
10. FINISHED GRADES SHALL BLEND SMOOTHLY WITH EXISTING CONDITIONS UNLESS OTHERWISE SHOWN.
11. DISTURBED AREAS NOT IMPROVED WITH ROAD SURFACING SHALL RECEIVE TOPSOIL AND SEEDING.Z



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REVISIONS:

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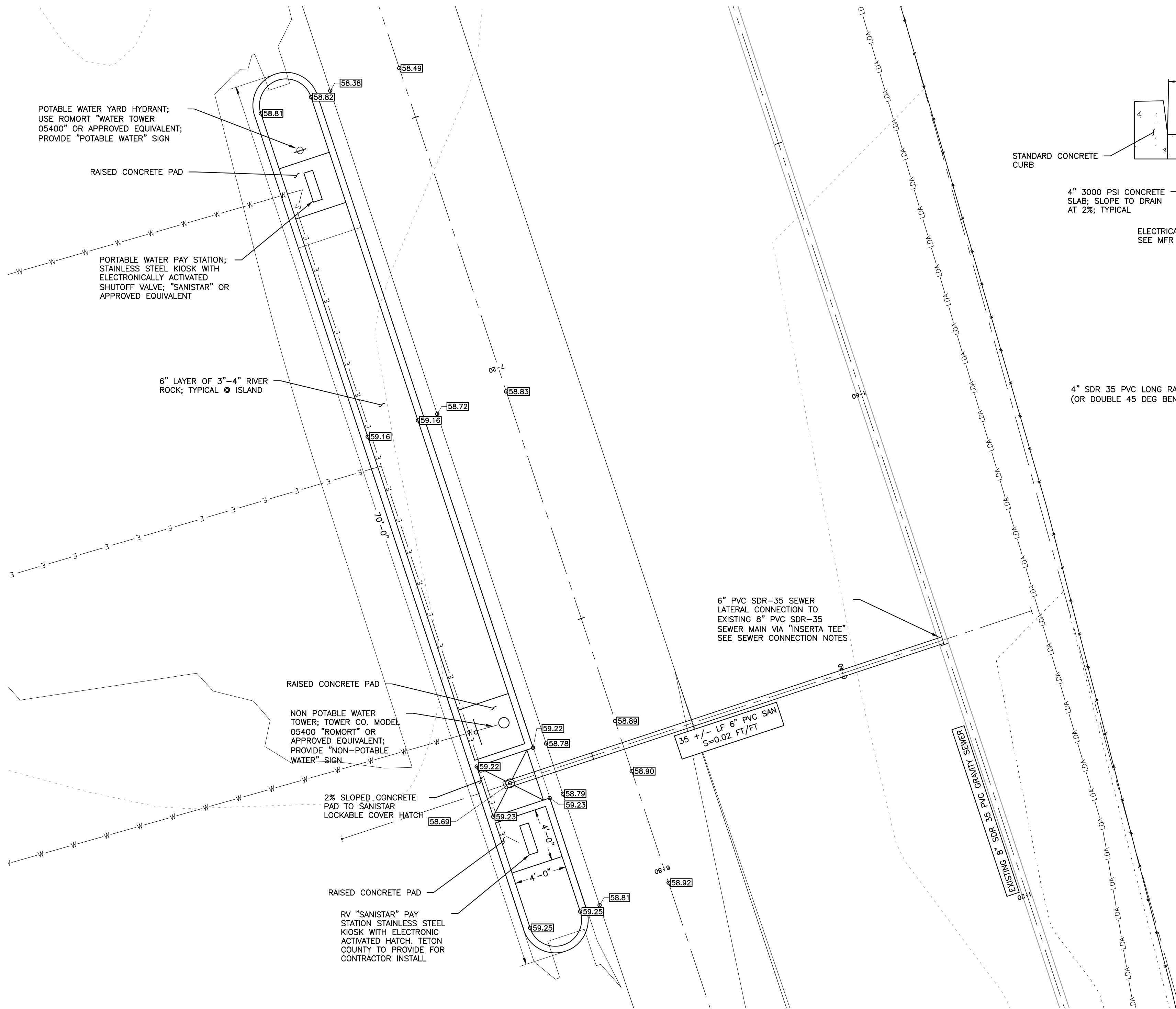
GRADING PLAN

PROJECT NAME

2026 TETON COUNTY
RV DUMP STATION

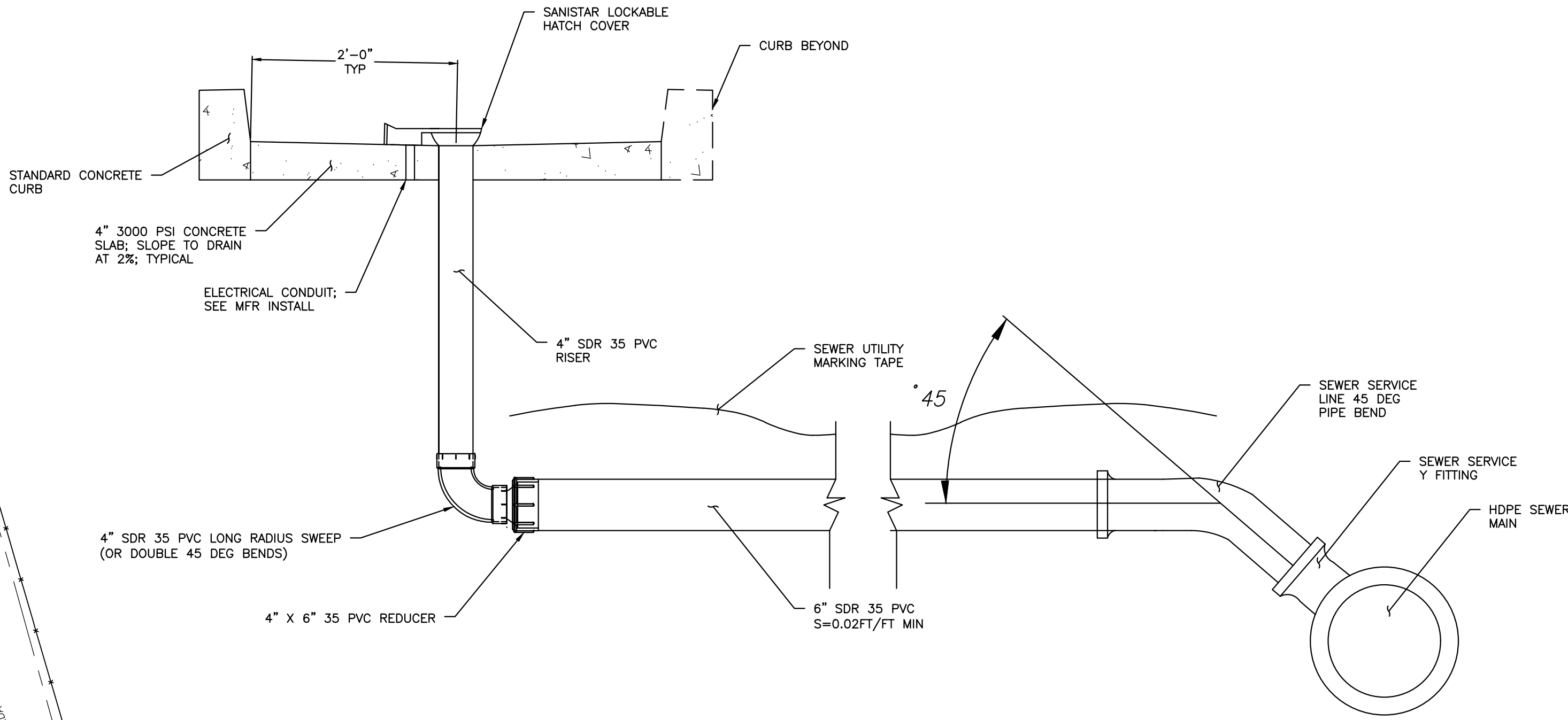
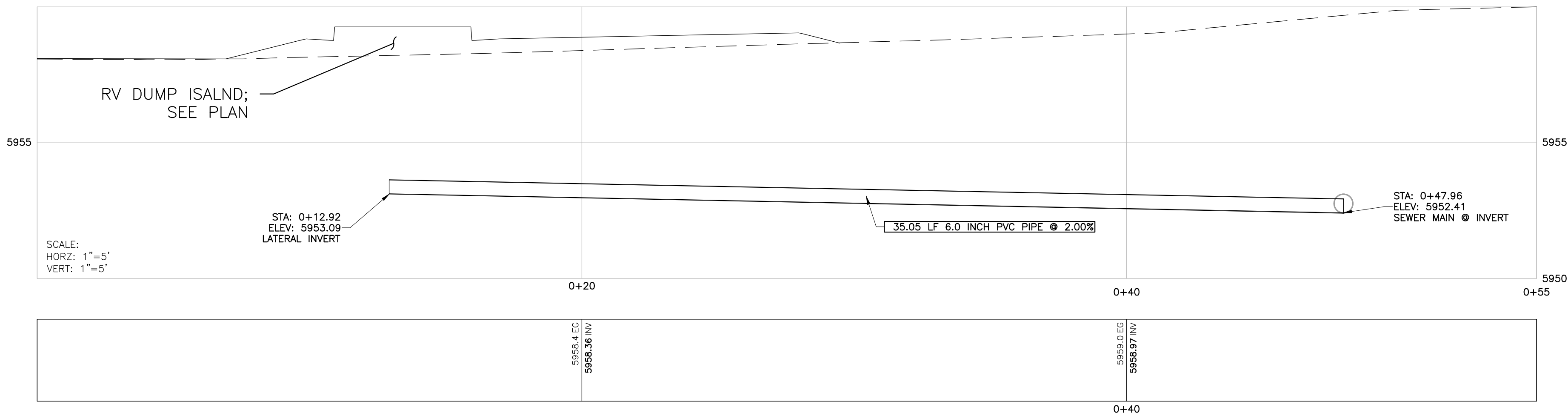
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DUMP STATION ISLAND AND UTILITY PLAN

1" = 5' 24"x36" PAPER



STANDARD RV SEWER CONNECTION DETAILS

NTS

GENERAL SEWER CONNECTION NOTES

1. ALL SANITARY SEWER LATERAL CONNECTIONS SHALL BE INSTALLED IN ACCORDANCE WITH THE PROJECT PLANS, MANUFACTURER RECOMMENDATIONS, AND APPLICABLE LOCAL STANDARDS.
2. SEE TRENCH DETAIL FOR BEDDING AND BACKFILL REQUIREMENTS
3. CONTRACTOR SHALL VERIFY LOCATION, SIZE, MATERIAL, AND ELEVATION OF EXISTING SANITARY SEWER MAINS PRIOR TO CONSTRUCTION.
4. ALL CONNECTIONS TO EXISTING SANITARY SEWER MAINS SHALL BE WATERTIGHT.
5. CONNECTIONS TO EXISTING PVC SEWER MAINS SHALL BE MADE USING APPROVED INSERTA TEE FITTINGS OR APPROVED EQUAL UNLESS OTHERWISE NOTED.
6. CONTRACTOR SHALL MAINTAIN CONTINUOUS SANITARY SEWER SERVICE AT ALL TIMES DURING CONSTRUCTION.
7. FOR LIVE SEWER CONNECTIONS, CONTRACTOR SHALL PROVIDE TEMPORARY BYPASS PUMPING OR PUMP DOWN FROM ADJACENT MANHOLES AS NECESSARY TO MAINTAIN DRY WORKING CONDITIONS AND PREVENT SEWAGE RELEASES.CONTRACTOR SHALL SUBMIT A BYPASS PUMPING PLAN TO THE ENGINEER PRIOR TO PERFORMING ANY LIVE SEWER CONNECTIONS.
8. ALL EXISTING SEWER MAINS SHALL BE PROTECTED FROM DEBRIS DURING CONSTRUCTION. CONTRACTOR SHALL IMMEDIATELY REMOVE ANY MATERIAL ENTERING THE PIPELINE. CORE DRILL ALL CONNECTIONS TO EXISTING SEWER MAINS. SAWCUTTING OR JACKHAMMERING OF EXISTING PIPE WILL NOT BE PERMITTED UNLESS APPROVED BY THE ENGINEER.
9. CONTRACTOR SHALL VERIFY THAT PROPOSED LATERAL SLOPES AND CONNECTION ELEVATIONS PROVIDE POSITIVE GRAVITY FLOW PRIOR TO INSTALLATION.
10. ALL SANITARY SEWER PIPE AND FITTINGS SHALL BE BEDDED AND BACKFILLED IN ACCORDANCE WITH PROJECT SPECIFICATIONS.
11. ENGINEER SHALL BE NOTIFIED A MINIMUM OF 48 HOURS PRIOR TO ANY CONNECTION TO AN EXISTING LIVE SANITARY SEWER MAIN.

SEWERAGE CHARACTERISTICS

1. PROPOSED USE CONSISTS OF AN RV DUMP STATION SERVING RECREATIONAL VEHICLES ONLY. WASTEWATER DISCHARGED TO THE SYSTEM SHALL CONSIST OF DOMESTIC SANITARY WASTEWATER FROM RV HOLDING TANKS INCLUDING BLACKWATER AND GRAYWATER. NO INDUSTRIAL, COMMERCIAL PROCESS, PETROLEUM, HAZARDOUS, OR NON DOMESTIC WASTEWATER SHALL BE DISCHARGED TO THE SYSTEM.
2. DESIGN AVERAGE DAILY FLOW RATE: 3,000 GALLONS PER DAY (GPD), BASED ON AN ESTIMATED 30 RVs PER DAY AT 100 GALLONS PER RV PER DAY, IN ACCORDANCE WITH TABLE 2 EXCERPTED FROM WYOMING WATER QUALITY RULES AND REGULATIONS, CHAPTER 25.
3. ANTICIPATED WASTEWATER CHARACTERISTICS ARE CONSISTENT WITH MEDIUM TO STRONG DOMESTIC WASTEWATER AS PRESENTED IN WASTEWATER ENGINEERING: TREATMENT AND REUSE, METCALF AND EDDY, 2003.
BIOCHEMICAL OXYGEN DEMAND (BOD₅): 220 TO 400 MG/L
TOTAL SUSPENDED SOLIDS (TSS): 220 TO 350 MG/L
4. DESIGN, CONSTRUCTION, AND OPERATION OF THE PROPOSED FACILITY SHALL COMPLY WITH APPLICABLE REQUIREMENTS OF WYOMING WATER QUALITY RULES AND REGULATIONS, CHAPTER 25.



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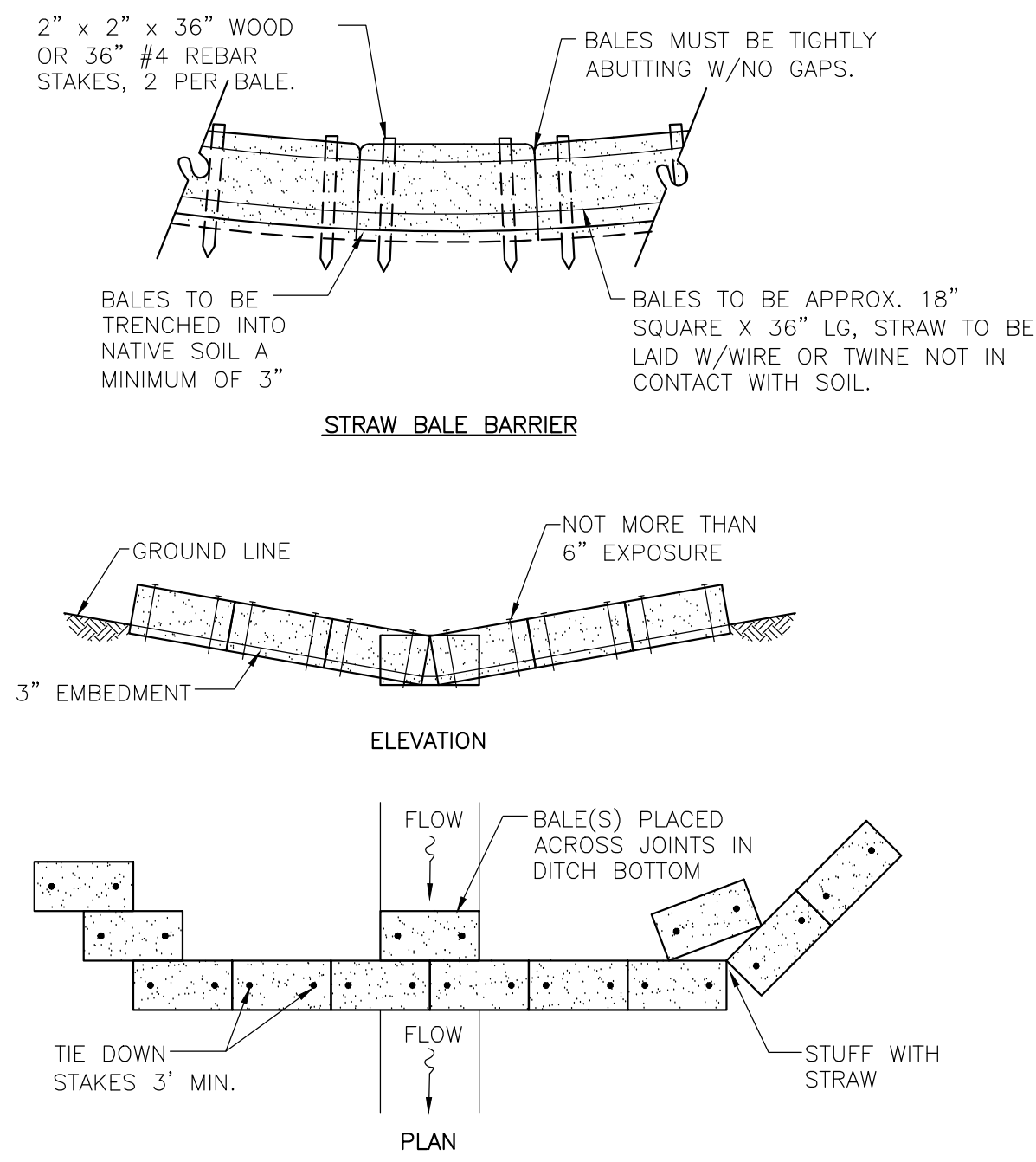
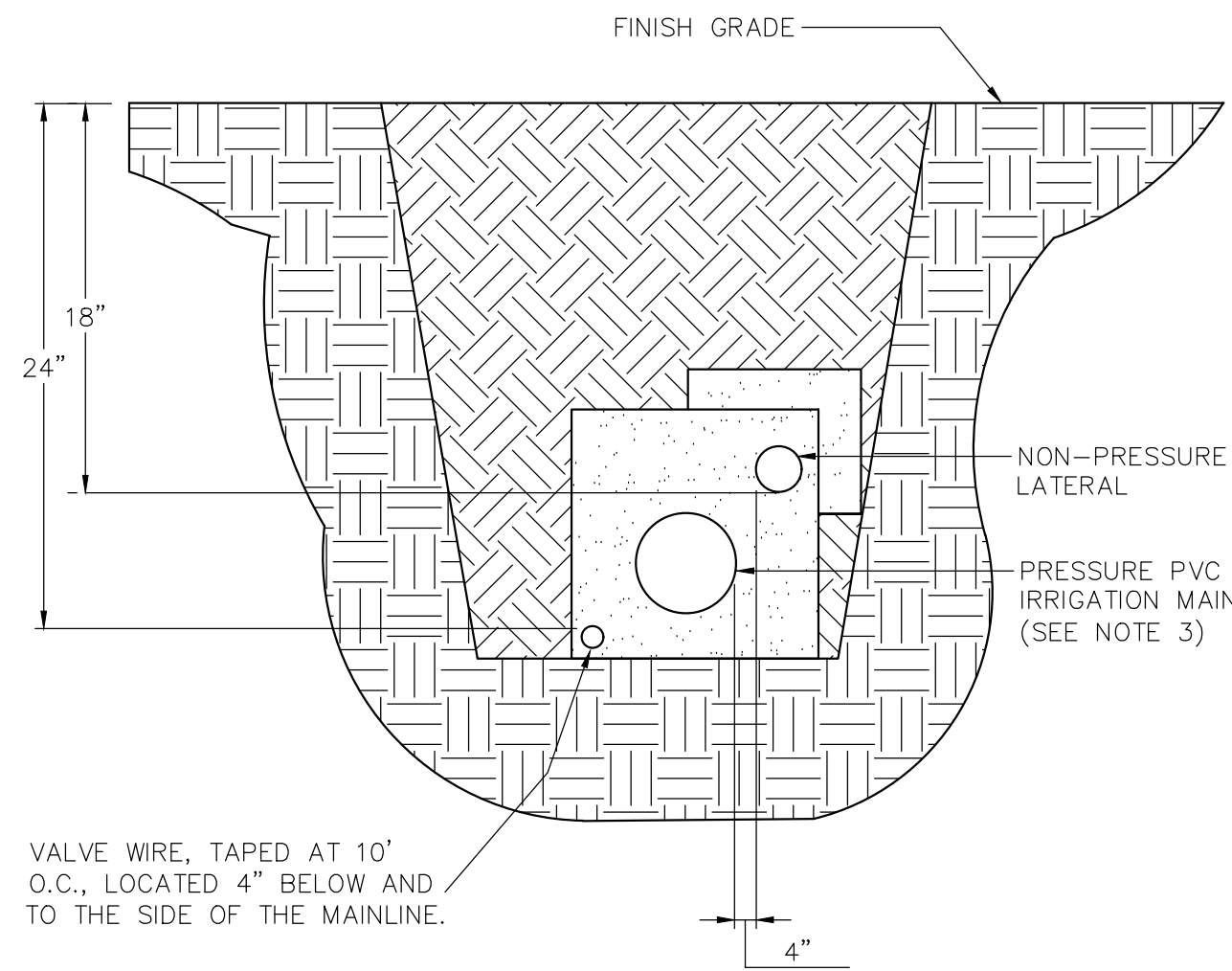
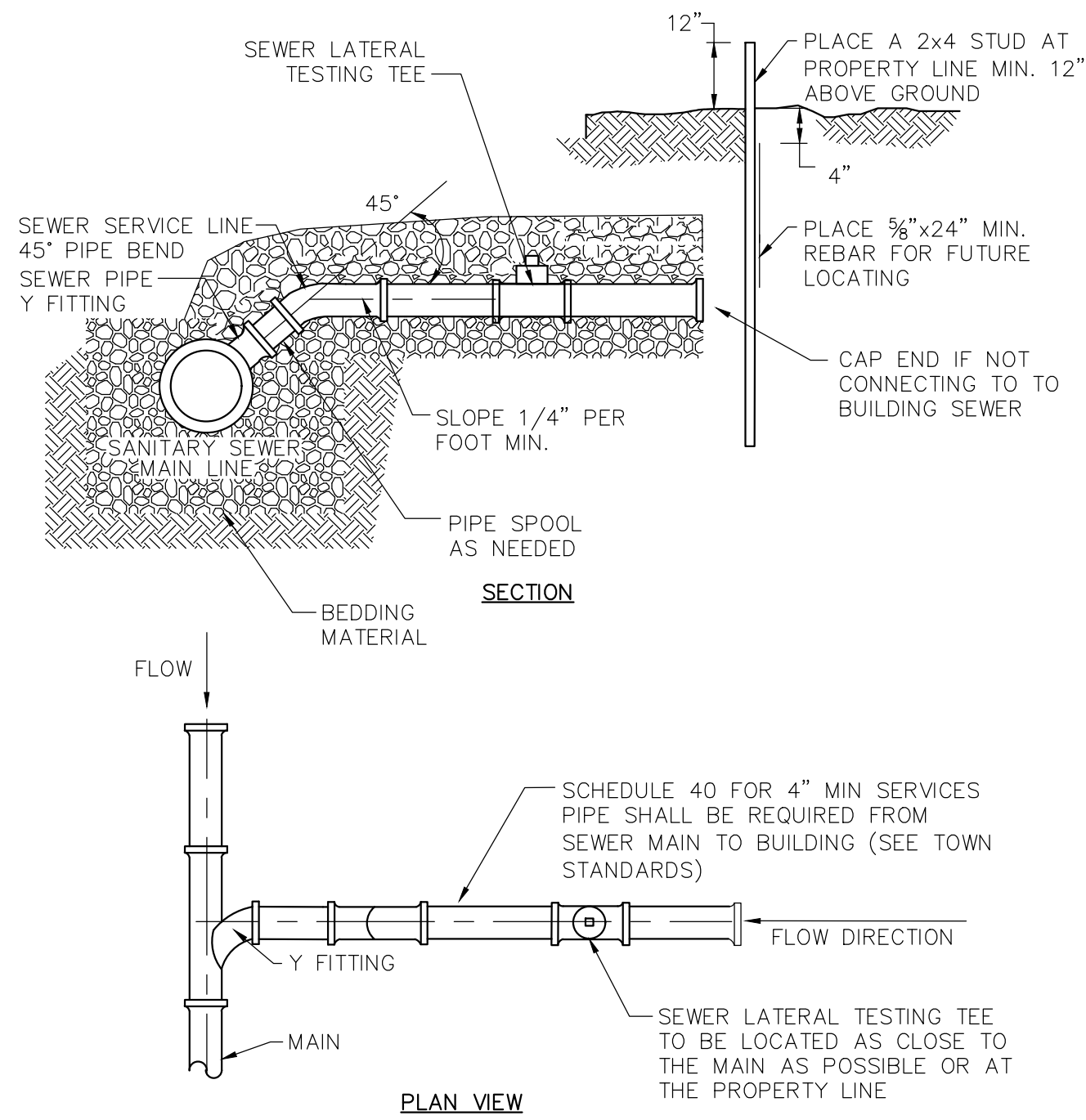
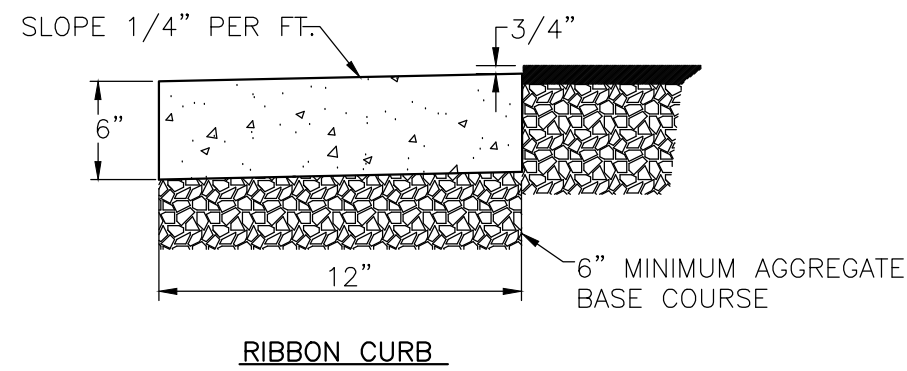
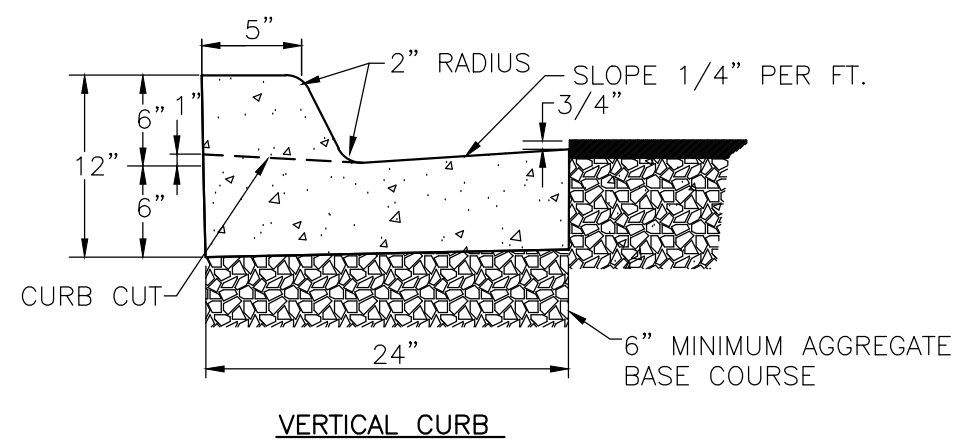
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UTILITY PLAN

PROJECT NAME

2026 TETON COUNTY
RV DUMP STATION

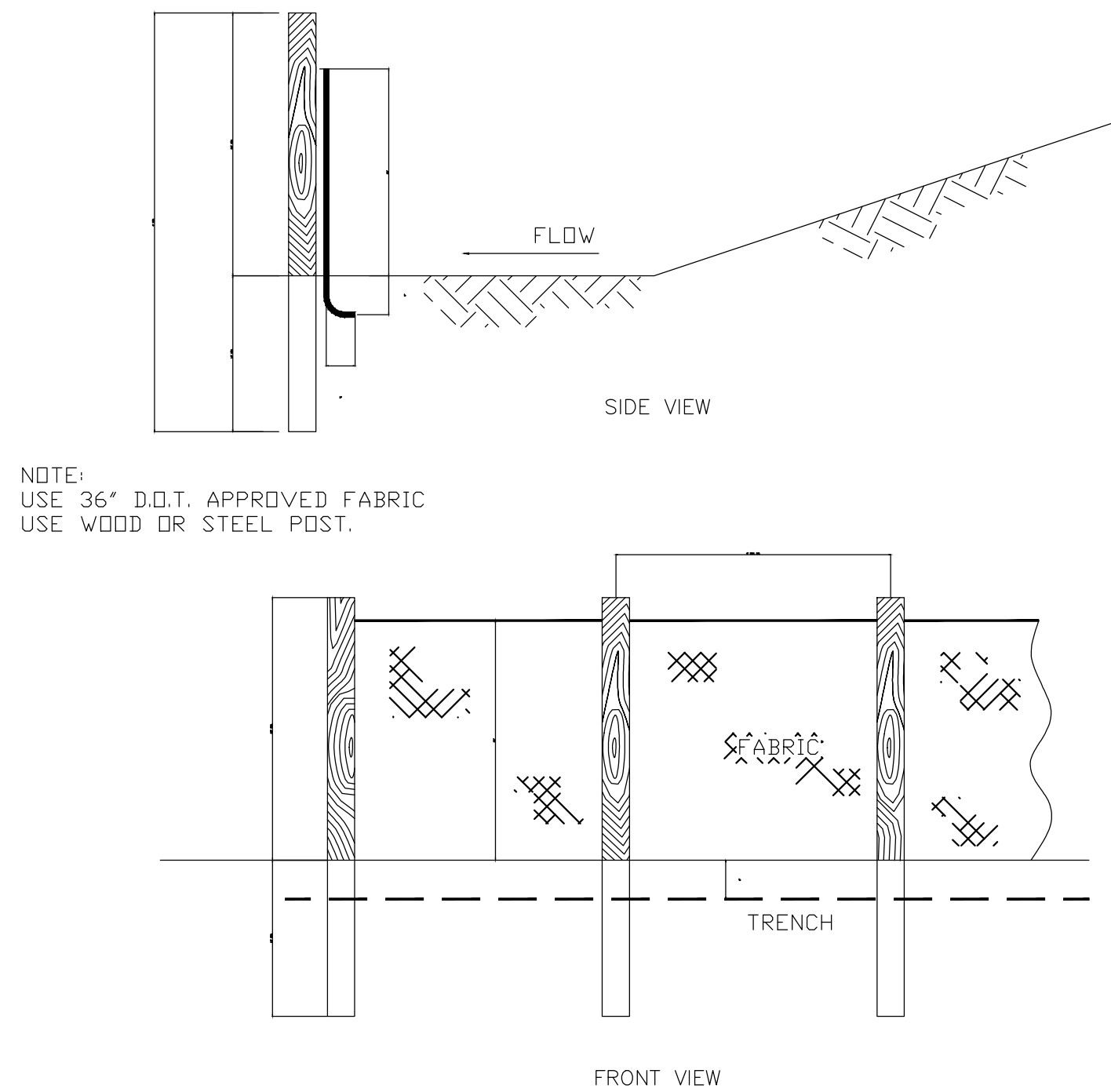
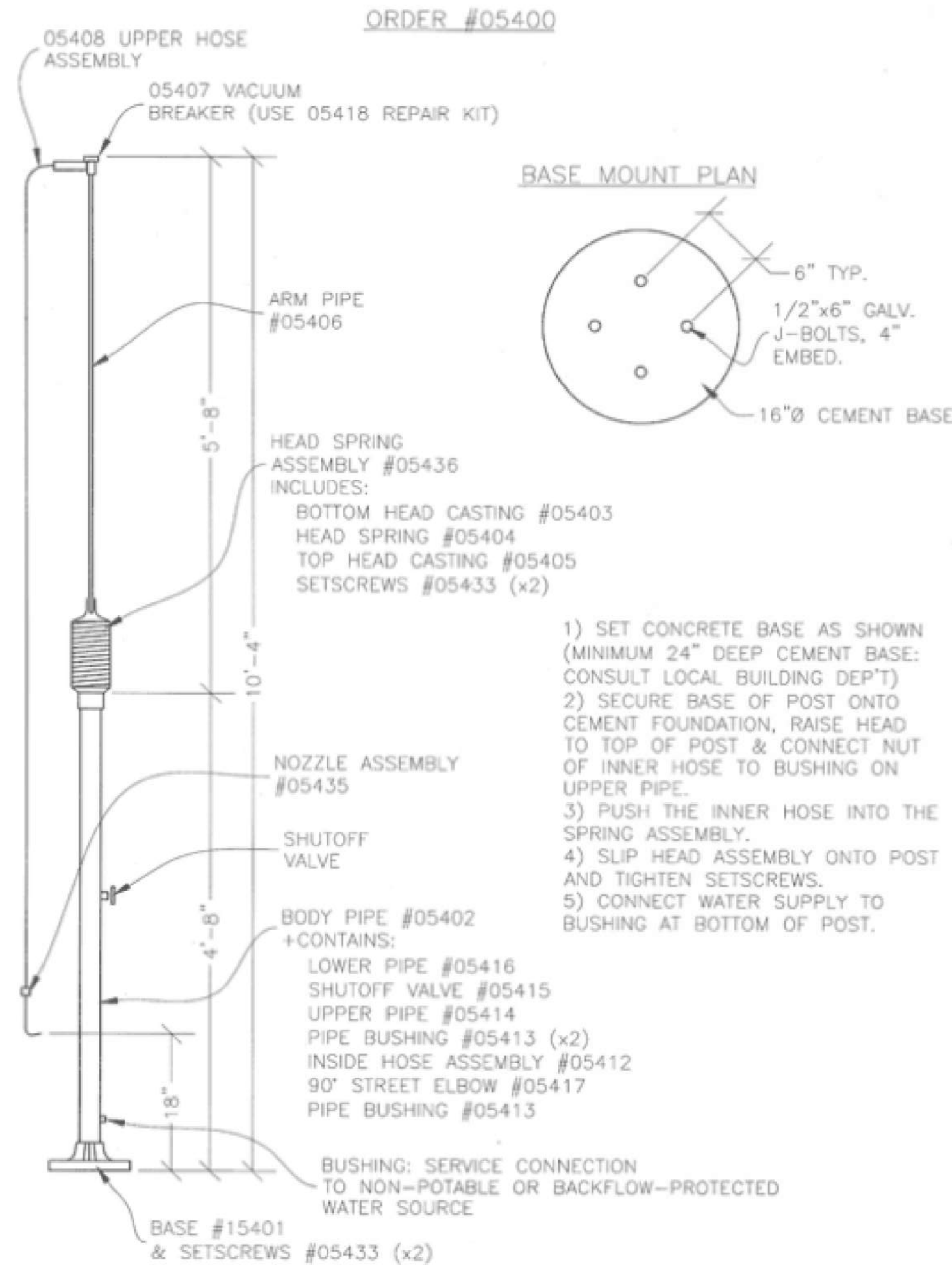
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- NOTES:
- CURBS SHALL CONFORM TO WPSS SECTION 02525, EXCEPT THAT PORTLAND CEMENT CONCRETE SHALL BE FIBERMESH-REINFORCED CLASS 4000 CONCRETE CONFORMING WITH WPSS SECTION 03304, PART 2.07.
 - AGGREGATE BASE COURSE SHALL BE SIX INCH MINIMUM THICKNESS, CONFORM TO WPSS SECTION 02190, PART 2.03, GRADING H, AND BE INSTALLED PER WPSS SECTION 02231, PART 3.03.
 - REMOVAL AND REPLACEMENT OF CURB SHALL TAKE PLACE IN FULL PANELS.
 - ROLL CURB SHALL NOT BE ALLOWED.

- NOTES:
- NEW SERVICE CONNECTIONS TO EXISTING SANITARY SEWER MAINS SHALL BE COMPLETED BY TOWN OF JACKSON. THE PRIVATE PARTY BEING SERVED BY THE NEW CONNECTION SHALL BE RESPONSIBLE FOR CARRYING OUT BACKFILL OPERATIONS.
 - BACKFILL OPERATIONS AT NEW SERVICES CONNECTED TO EXISTING SANITARY SEWER MAINS SHALL BE COMPACTED PER TOWN STANDARDS.
 - CLEANOUT TO BE PROVIDED ADJACENT TO HOUSE EVERY 100' OR SERVICE LINE AND AT ALL BENDS.

- NOTES:
- APPROVED TOPSOIL BACKFILL SHALL BE USED TO REPLACE ANY NATIVE MATERIAL IN EXCESS OF 1" MINUS. THERE IS TO BE A 6" PIPE ZONE OF CLEAN SAND BACKFILL AROUND ALL IRRIGATION LINES.
 - CONTRACTOR SHALL CONTACT PROJECT MANAGER WHEN EXISTING TREES ARE PRESENT.
 - PRESSURE IRRIGATION MAIN SHALL BE LOCATED ON THE SIDEWALK SIDE OF PARKWAY STRIPS, AWAY FROM ROADWAY CURB AND GUTTER, WHERE APPLICABLE.



- TYPE A FABRIC (36")
- USE:
- ON DEVELOPMENTS WHERE THE LIFE OF THE PROJECT IS GREATER THAN OR EQUAL TO 6 MONTHS.
 - WHERE THE SLOPE GRADIENT IS STEEPER THAN 3:1.

POST SIZE			FASTENERS FOR WOOD POST (WIRE STAPLES)			
MIN. LENGTH	TYPE OF POST	SIZE OF POST	GAUGE	CROWN	LEGS	STAPLES/POST
4'	SOFT WOOD	3" DIA. OR 2X4	17 MIN.	3/4" WIDE	1/2" LONG	5 MIN.
4'	OAK	1.5"X1.5"	FASTENERS FOR WOOD POST (NAILS)			
4'	STEEL	1.3 LB./FT. MIN.	14 MIN.	1"	BUTTON HEADS	NAIL/POST
					3/4"	4 MIN.

NOTE: FILTER FABRIC MAY ALSO BE ATTACHED TO THE POST BY WIRE, CORD, AND POCKETS.



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REVISIONS:

DRAWING TITLE

STANDARD DETAILS

PROJECT NAME

2026 TETON COUNTY
RV DUMP STATION

SHEET NUMBER:
C5.0



RENDEZVOUS ENGINEERING, P.C.

Civil Engineers and Planners in Wyoming and Idaho

Rendezvous Project No: 19-011.0

July 21, 2026

Amy Ramage
Teton County Engineer
P.O. Box 3594
Jackson, WY 83001

aramage@tetoncountywy.gov

Re: Munger Mountain Wastewater Collection
Teton County RV Dump Station

Dear Amy,

I have reviewed the initial DEQ permit submittal, stamped by Teton County staff engineer, John Kemp, dated 6/15/2026 and offer the following comments and concerns regarding the proposed RV wastewater dump station connection to the Munger Mountain wastewater collection system.

The RV dump station location is just upstream of the Munger Mountain Wastewater grinder and lift station near the Highway 89 crossing over the Snake River. The proposed RV Dump station will have card-payment access control. Considering the dump station will normally be unmanned, there is risk of discharging harmful items that might damage the wastewater collection system or cause treatment issues for the Town of Jackson Wastewater Treatment Plant.

1) Wastewater quality.

- The Teton County School District is responsible for wastewater quality discharged to the Town of Jackson. Septic dumping into the Teton County School District's Munger Mountain wastewater collection system is specifically prohibited in the Connection and Use Agreement with the Town of Jackson. The RV Dump Station connection will require an amendment to that agreement.
- The Town of Jackson instates surcharge fees for wastewater treatment exceeding that of typical residential discharge. Typical wastewater characteristics for BOD (Biochemical Oxygen Demand) and TSS (Total Suspended Solids) for RV dump discharge are provided in the design report. The report describes the wastewater discharge as "medium to strong" for domestic sanitary wastewater. Current lift station summer wastewater flows are approximately 2,100 gallons per day. The average daily flow from the RV Dump is estimated at 3,000 gallons per day. Until more users are connected to the wastewater collection system, the RV Dump will have a significant impact on the combined wastewater characteristics.

- Provide means to prevent rocks, hard objects, and cords/rope from entering the sewer service line and potentially damaging the system grinder and lift pumps.
- There is concern that illegal dumping could occur and might include oil, solvents, and paint. Provide a treatment separator to collect floatable fats, oil, and grease and prevent their discharge into the wastewater collection system.
- RV wastewater produces hydrogen sulfide gas, which deteriorates Portland cement concrete structures. Lining or epoxy coating should be provided for concrete structures with potential to trap or collect hydrogen sulfide gas.

2) Wastewater volume measurement.

- Provide means to measure the wastewater flow discharged, including cleaning and flushing water.

3) Wastewater peak flowrate.

- The design report specifically mentions “shock loads” from the RV dump station. With the proposed dump site location near the existing sewer grinder, there is potential for peak flows to surge over the existing sewer grinder unit. Provide hydraulic analysis for peak flows discharged from the RV dump station occurring concurrently with the Munger Mountain sewer main design flows.

4) Wastewater System Operation and Maintenance.

- Provide an access manhole at the Munger Mountain sewer main connection for maintenance and discharge monitoring.
- Provide design features to minimize stormwater discharge into the wastewater collection system.
- Currently the existing sewer grinder and lift station do not have odor control. Odor control may be required for impacts specific to the RV Dump Station discharge.
- Provide proposed operating procedures Teton County will implement to regularly inspect and maintain the dump station and procedures to address potential surface spills, including reporting requirements.

5) Permits and Approvals.

- As a condition for the RV Dump connection, Teton County should reimburse Teton County School District engineering and legal fees for design review, permit applications, and for amendment to Connection and Use Agreement between Teton County School District No. 1 and the Town of Jackson.
- Provide copy of Wyoming DEQ review comments and permit to construct.
- Conditions of approval specific to the RV dump must be documented in the Wastewater System License, Connection, and Use Agreement between Teton County School District No. 1 and Teton County, Wyoming.



In summary, the RV dump station is a good service for our community and through prudent design, operation, and management will help prevent polluting discharges into the environment.

Please contact me with any questions.

Sincerely,



Matthew F. Ost diek, P.E.
President

Cc: Charlotte Renolds, Teton County School District
Jason Huggins, Teton County School District
Brian Lenz, Town of Jackson Engineer
Johnny Ziem, Town of Jackson Public Works
Brad Ellis, Wyoming DEQ
John Kemp, Teton County Engineering

creynolds@tcsd.org
jhuggins@tcsd.org
btlenz@jacksonwy.gov
jziem@jacksonwy.gov
bradley.ellis@wyo.gov
jkemp@tetoncountywy.gov



STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Administration	Presenter:	Tyler Sinclair
Agenda Item:	Parks and Recreation Joint Power Agreement Update	Public Comment:	Yes

Purpose or Policy Considerations.

The purpose of this item is for the Council to consider approval of a one-year extension of the Joint Power Agreement between the Town of Jackson and Teton County, Wyoming for the Parks and Recreation Department.

Recommendations.

Staff recommend approval of the one-year extension of the Joint Power Agreement.

Background.

At the February 2, 2026, Joint Meeting staff provided background information, analysis, alternative options, and answered questions from the Council and Board of County Commissioners (BCC) regarding the Parks and Recreation Joint Powers Agreement. After gaining a common understanding of the topic and associated alternatives, at the July 6, 2026 Joint Meeting, the Town Council and BCC directed staff to extend the existing Parks and Recreation Joint Power Agreement for one year, allowing the parties another year to discuss this joint effort.

Analysis & Key Questions.

The policy considerations and key questions associated with the extension of the Parks and Recreation Joint Power Agreement were discussed and resolved at the July 6, 2026 Joint Meeting.

Possible Alternatives.

Council has the option to:

1. Alternative 1: Decline the one-year extension of the Joint Power Agreement. In doing so Council would be reversing course from the decision made at the July 6 Joint Meeting. Staff do not recommend this course of action given that the FY27 budget is in place and built on the Parks and Recreation Joint Power Agreement being in place for the fiscal year.
3. Alternative 2: Direct staff to defer consideration of this Agreement and request additional information before acting. Staff does not recommend deferral in light of Council's action at the July 6 Joint Meeting and the expected ongoing staff and elected official work on this and other joint efforts during the FY28 budget process.

Comprehensive Plan & Priority Alignment.

The review and update of this Joint Agreement is consistent with two provisions of Section 8: Quality Community Service Provision goal:

- *Timely, efficiently and safely deliver quality services and facilities in a fiscally responsible and coordinated manner.*
- *Budget for service delivery Budgeting allows for an annual commitment to service delivery objectives. Each year, the Town and County will evaluate service delivery objectives during the budgeting process, make appropriate modifications to the delivery approach, and affirm the desired service level with the appropriate amount of funding. Without adequate funding, even the most thoughtful and strategic approach will fall short of its objectives, so a careful budgeting process is essential.*

Fiscal Impact.

Approving this one-year extension of the Joint Power Agreement for the Parks and Recreation Department will have the fiscal impact set forth in the FY27 budget previously approved by Council.

Staff Impact.

Staff spent approximately 45 hours preparing materials and analysis on the Joint Power Agreement for the Parks and Recreation Department.

Attachments or Links.

The Town of Jackson and Teton County Joint Power Agreement for Parks and Recreation and Agreement Establishing the Teton County/Jackson Parks and Recreation Department and Teton County/Jackson Parks and Recreation Advisory Board.

Suggested Motion.

I move to approve the Town of Jackson and Teton County Joint Power Agreement for Parks and Recreation and Agreement Establishing the Teton County/Jackson Parks and Recreation Department and Teton County/Jackson Parks and Recreation Advisory Board, subject to minor changes by staff.

THE TOWN OF JACKSON AND TETON COUNTY JOINT POWER AGREEMENT FOR PARKS AND RECREATION AND
AGREEMENT ESTABLISHING THE TETON COUNTY/JACKSON PARKS AND RECREATION DEPARTMENT AND TETON
COUNTY/JACKSON PARKS AND RECREATION ADVISORY BOARD

This Agreement is made and entered into on _____ day of _____, 2026 by and between the Town of Jackson, Wyoming, a municipal corporation of the State of Wyoming, hereinafter referred to as "*Town*," and Teton County, Wyoming, a duly organized county of the State of Wyoming, hereinafter referred to as "*County*."

WITNESSETH:

WHEREAS, Wyoming Statute §16-1-105, Joint Agreements, allows for two (2) or more agencies to enter into agreements with each other for joint or cooperative action; and

WHEREAS, this Joint Power Agreement is created pursuant to W.S. §16-1-105 and it is specifically recognized that this Agreement does not create a separate legal entity, nor is this Agreement created or governed by W.S. §16-1-106 Joint Powers Boards, and

WHEREAS, Teton County and the Town of Jackson (hereinafter referred to as "*Parties*") have determined that there is a need within Teton County and the Town of Jackson for a system of parks and recreation facilities, which shall be encompassed in a Parks and Recreation Department (hereinafter referred to as the "*Department*"); and

WHEREAS the Department shall have an advisory board to oversee the responsibilities of the Department; and

WHEREAS, in furtherance of the need for a system of parks and recreation facilities in accordance with statutory authorization, the Town and County are expending funds to support the system.

NOW THEREFORE, it is hereby resolved by the Town and County in duly assembled meetings, and in consideration of the foregoing and of the cooperation to be had between the Parties and the performance of the promises contained herein, the Parties hereto agree as follows:

1. **Purpose.** The purpose of this Agreement is to jointly provide for a system of public parks and recreational facilities within Teton County and the Town of Jackson, and to create the Teton County/Jackson Parks and Recreation Department, which is to be overseen by the Teton County/Jackson

Parks and Recreation Advisory Board, (hereinafter referred to as the “Board”). The Board shall be an advisory board to the Parties and is specifically not a joint powers board, and no separate legal entity is created by this Agreement.

2. **Duration.** This Agreement shall commence on the date of approval by the Wyoming Attorney General, following the adoption and approval of this agreement by both parties hereto, and shall terminate on June 30, 2027, unless sooner terminated or extended as hereinafter provided.

3. **Name.** This Agreement creates the Teton County/Jackson Parks and Recreation Department, which is a cooperative action between the Town of Jackson and Teton County. The Department shall be managed by a Director of the Teton County/Jackson Parks and Recreation Department (hereinafter referred to as “Director”).

4. **Advisory Board Composition.** The Board shall consist of seven (7) voting members, all of whom shall be qualified electors of Teton County, Wyoming. All members shall be appointed by joint appointment by the Board of County Commissioners of Teton County, Wyoming, and the Town Council of the Town of Jackson, for three (3) year staggered terms. The existing board under the 2016 Joint Powers Agreement shall continue to constitute the Board. The Board shall also include one (1) member of the Board of County Commissioners, one (1) member of the Town of Jackson Town Council, and one (1) member of the Teton County School District. Such members shall sit ex-officio, and shall not have the right to vote on any matters.

5. **Removal.** Any member of the Board may be removed without cause by the joint approval of the Board of County Commissioners and the Town Council of Jackson.

6. **Powers Delegated and Roles of the Parties, the Board, and Director.** So as to minimize confusion as to the roles and responsibilities of the Parties hereto, the Board formed hereby and the Director and staff utilized, the Parties identify such roles and responsibilities as follows:

(a) The Director shall have the power to manage the day-to-day affairs of the Department.

(b) The Board is hereby delegated the authority to create policies, rules, and regulations; engage in both long-term and short-term strategic planning; and establish rates for the use -of the parks and recreation facilities; with the direct input of the Director of the Department in all of the above listed delegations.

(c) Teton County and the Town of Jackson shall jointly approve facility usage rate increases in excess of twenty-five percent (25%). In addition, the power to hire, fire, and discipline the Director of the Department shall be with the Teton County Commissioner's Administrator. The Director of the Department shall be a direct report to the Teton County Commissioner's Administrator. Through their financing function, the Town and County shall have sole and absolute discretion to appropriate funds for the continued functioning of the Department. Neither the Town nor the County has an obligation to fund the

Department.

7. **Ownership of Facilities.** The parks or recreational facilities, including leased property, and all of the facilities currently located upon them, as well as equipment currently utilized by the Parks and Recreation Department, shall continue to be the sole property of the respective Party that currently has ownership. Each Party shall be deemed to own a one-half (1/2) undivided interest in certain equipment and facilities that is not specifically owned solely by one party. Future acquisitions of property must be designated as co-owned or as solely owned by one party at the time of its acquisition. If property is not designated at its time of acquisition, the default shall be sole ownership by the respective Party.

8. **Financing and Budget.**

(a) **General Finance.** All expenditure and revenue transactions pertaining to the Department shall be recorded in a separate Special Revenue Fund that will be part of the County of Teton reporting entity. This special fund shall be called the Parks and Recreation Fund (hereinafter referred to as "Fund"). The Town of Jackson and Teton County shall each finance joint and cooperative undertaking by the appropriation by each Party with the Town contributing 40% and Teton County contributing 60%.

The annual fiscal year contribution shall be calculated in the prior year during the annual budgeting process. The combined contributions from the Parties will be the difference between the projected ending Fund balance (on a modified accrual basis) and the agreed-upon targeted Fund balance. The estimated Fund balance calculation for the fiscal year of the contribution shall be calculated as follows:

Estimated Beginning Fund Balance
Plus(+): All Estimated Program Sources
Minus(-): All Estimated Program Uses

Equals (=): Estimated Fund Ending Balance

Subject to Teton County invoicing, the Town of Jackson will remit one-twelfth (1/12) of the approved annual contribution on a monthly basis throughout the fiscal year. All expenditures and revenue pertaining to the Fund will be paid/received by Teton County and recorded as a debit/credit to the Fund. The Town of Jackson will not accept Department revenue or incur Department expenditures other than through Teton County, except grant proceeds and grant-related expenditures where the Town of Jackson is the grantee.

(b) **Budgeting Procedures.** The Department is required to comply with both Parties' budgetary procedures, which includes format and timing requirements for appropriation requests. All appropriations and budgeted revenue need approval from both Parties before the budget is considered "approved." The Department will comply with both Parties' supplemental appropriation process. The Department is

required to comply with both Parties' Capital Improvement Plan (CIP) procedures, which include formal and timing requirements for project submittal.

(c) Fund Balance (Reserves). The fiscal year ending Fund balance, calculated on the modified accrual basis of accounting, of the Fund will be reported by Teton County to the Town of Jackson as soon as the Teton County Audited Financial Statements are published.

The desired level of the reserves, or the targeted Fund balance, will be proposed by the Teton County Budget Officer, and will be reviewed each year during the annual budget process. Ownership of the reserves of the Fund is shared based upon the most current census data utilized by the State of Wyoming in making sales tax distributions to the Town of Jackson and Teton County. Investment of idle funds must be done in compliance with Teton County investment policy and Wyoming Statutes.

9. Auditor Recommendations. The Parties intend to abide by all recommendations of their auditors. Recommendation of the parties' auditors proposed after the date hereof shall be deemed incorporated herein as they may be made from time to time.

10. Financing of Operations and Capital Expenditures. For purposes of timing, Financing Operations, Capital Expenditures and Budgeting, the Board shall be controlled by the more restrictive of the statutory fiscal procedures applicable to the Town and County. The funding of the Department shall be a negotiated process pursued in good faith by the sponsoring entities.

11. Methods of Operation. The Parties agree that in the interest of efficiency and in order to avoid unnecessary redundancies and to take advantage of established fiscal, personnel, insurance and other arrangements, the Parks and Recreation Department shall operate as if it were a department of the County. This includes, but is not limited to, utilizing the following: County personnel policies, County fiscal management and auditing, County retirement and health and medical insurance, and County casualty and personal liability insurance. The finally approved budget of the Department shall be within the County's budget and the County shall be responsible for performing all required audits and reporting to appropriate agencies. All employees of the department shall be employees of Teton County, which shall be responsible for direct withholding and payment of all compensation, fringe benefits, employment taxes, workers' compensation, or other recompense, but subject to contribution by the Town according to the financing split between the parties based upon the most current census data utilized by the State of Wyoming in making sales tax distributions to the Town of Jackson and Teton County. Property which is solely owned by the Town shall be insured by the Town. Any property in which the County has an ownership interest shall be insured by the County. All contracts entered into by the Department shall be approved solely by the Board of County Commissioners of the County of Teton.

12. **Termination or Extension of Agreement.** This Agreement may be terminated by the resolution of either the Board of County Commissioners of Teton County, Wyoming, or the Town Council of the Town of Jackson, Wyoming duly adopted; provided, however, that neither party shall be permitted to terminate this Agreement or its obligations hereunder if said termination, or the manner of termination, constitutes a breach of any contract for the purpose, lease, use or hiring of any facilities, property or services pursuant hereto. Upon such termination, all properties belonging to one of the Parties which provided the property as hereinabove designated, shall revert to and be the sole and separate property of that Party. All properties jointly provided or funded by the Parties hereto shall be by mutual agreement between the Parties.

13. **Prior Agreements.** This Agreement shall supersede any and all prior agreements between the Parties hereto with respect to the operation and maintenance of the Department of Parks and Recreation and all such related facilities, and any such prior agreements are hereby rescinded and rendered null and void. This Agreement contains the entire agreement between the parties concerning the establishment of the Department and Board as hereinabove contemplated for the operation and maintenance of the system of parks and recreation hereinabove described.

IN WITNESS WHEREOF, the undersigned have executed this Agreement on the day and year indicated, but to be effective as of the day and year above written.

TOWN OF JACKSON, WYOMING

By: _____

Arne O. Jorgensen, Mayor

Dated

Attest:

By: _____

Marisa N. Watsabaugh , Town Clerk

BOARD OF COUNTY COMMISSIONERS OF TETON COUNTY, WYOMING

By: _____

Mark Newcomb, Chair

Dated

Attest:

By: _____

Maureen E. Murphy, County Clerk

STATE OF WYOMING

OFFICE OF ATTORNEY GENERAL

In accordance with Wyo. Stat. §16-1-105(a)(ii), I hereby certify that the foregoing Agreement for Fire between the Town of Jackson and Teton County was received by this office and has been reviewed and is approved as to form and with respect to compliance with the Constitution and Law of the State of Wyoming.

Approved this ____ day of _____, 2026.

By: _____

Keith Kautz
Attorney General
State of Wyoming

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Planning & Building Department	Presenter:	Paul Anthony
Agenda Item:	Demolition Permit Stay Request for 700 East Pearl Avenue (DEM26-0012)	Public Comment:	Yes

Purpose or Policy Considerations.

The purpose of this item is for the Council to review and consider a demolition permit application for a residential structure at 700 East Pearl Avenue pursuant to the Jackson Municipal Code. The Teton County Historic Preservation Board has determined the structure is not historically significant but has recommended the minimum 60-day stay on issuance of the demolition permit per the demolition ordinance. Council is being asked to determine the length of the stay, which must be between 0 and 100 days under the Municipal Code.

Recommendations.

The Teton County Historic Preservation Board ("TCHPB") recommends a 60-day stay, beginning July 14, 2026, and ending September 12, 2026, on the issuance of the demolition permit. Staff note that the 60-day stay is shortest amount possible that the TCHPB is able to recommend as the structure is over 50 years in age.

The Planning Director does not recommend a stay.

Background.

On June 16, 2026, property owner Greogry Freer applied for a demolition permit at 700 E Pearl Avenue to remove portions of the residential structure at that property to facilitate a remodel and addition project. The application was received by the Planning and Building Department and forwarded to the TCHPB for review in accordance with the Jackson Municipal Code. An aerial map of the property is provided below. Pictures of the existing structure proposed for partial demolition and plans indicating location of proposed demolition are included as attachments to this staff report.

Aerial Map of Property



The demolition permit review process is limited to the question of whether a stay is appropriate and does not evaluate the proposed future use of the site. Staff note that the property owner has applied for a building permit (B26-0178) to addition and remodel of the existing structure.

The Jackson Municipal Code provides that no building or structure within the Town may be demolished without first obtaining a demolition permit. This requirement is in place in recognition of the fact that buildings, structures, and areas of the Town have special historic or aesthetic interest and providing a stay before demolition is valuable for public comment and so the applicant explores alternatives to demolition.

The process for obtaining a permit is set out in Chapter 15.38 and includes that, upon receiving an application pursuant to the International Building Code, the Planning and Building Department provides the application to the TCHPB, who in turn provides a recommendation to the Town Council within 45 calendar days. The TCHPB determines either:

- 1) The building or structure is not historically significant, is not architecturally significant, and is not more than 50 years old; or
- 2) The building or structure is historically significant, is architecturally significant, or is more than 50 years old.

If the TCHPB determines the latter, it must recommend a stay in the issuance of a demolition permit for a period of *not less* than 60 days and *not more* than 100 days, which begins on the day of TCHPB's recommendation, and is for the purpose:

- i) of public comment; and
- ii) for the applicant and other interested parties to explore alternatives to demolition.

In the event the TCHPB does not make a recommendation to the Town Council within 45 calendar days from its receipt of the demolition application, the TCHPB will be deemed to concur with demolition, and the application shall proceed through the regular permitting process.

Analysis & Key Policy Questions.

The central question before Council today is not whether the structure should be demolished, that is the applicant's right to pursue. The question is whether to impose a stay, and if so, for how long. A stay provides time for public input and for the applicant and interested parties to explore whether alternatives to demolition exist. It does not prevent demolition from ultimately occurring.

It should be noted that the requested demolition does not involve removing the structure but only removing portions of the structure to allow for an extensive remodel. Under the demolition ordinance, removal of more than 50% of the front façade requires a demolition permit, so this is the reason a demo permit was required. Thus, because the house is not being removed, many of the usual justifications for a stay, such as providing time to explore relocation of the structure, are not applicable or necessary in this case. For this reason, the Planning Director does not recommend a stay.

In evaluating the historic significance of a structure, the TCHPB – and Council – uses the criteria in LDR Sec. 5.9.4 for considering designating structures on the Jackson Historic Register and reviewing structures proposed for demolition. The LDR historic designation criteria closely follow federal National Register historic preservation standards. Below are the historic preservation criteria found in LDR Sec. 5.9.4:

A. Age. Individual properties shall be at least 50 years old. However, a property may be exempted from the age standard if Council finds it to be exceptionally important.

B. Historic Significance. Properties shall be found to have historic significance in these categories in order to be considered for designation:

1. Association with events that have made a significant contribution to history;
2. Connection with persons significant in history;
3. Distinctive characteristics of a type, period, method of construction, or artisan;
4. Geographic importance; and/or
5. Possibility to yield important information related to prehistory of history.

C. Integrity. In addition to having historic significance as outlined above, a property must be found to retain sufficient integrity. All properties shall be evaluated for their physical integrity by using the National Register bulletins to evaluate the following criteria:

1. Location;
2. Design;
3. Setting;
4. Materials;
5. Workmanship;
6. Feeling;
7. Association.

For this project, the TCHPB met on July 14, 2026, and determined the residential structure in question is not historically significant according to the Town of Jackson Designation Criteria to the Jackson Historic Register. However, the structure is greater than 50 years old and so the demolition ordinance requires that the TCHPB either recommend a stay of between 60-100 days or take no action (resulting in a de-facto recommendation of 0 days). The TCHPB recommended the minimum duration of 60 days, however, the Board was not fully aware that they had the option to take no action and thereby communicate that no stay was recommended. Staff will make sure to inform the Board of the purpose of the “no action” option for future applications.

It is critical to note that the Council is not required to limit its decision to the same 60-100 day stay window for structures over 50 years. Instead, the Council can approve a stay of between 1 – 100 days, or no stay at all.

The attached demolition permit application has a full summary of the request, background materials, and photos.

Key Policy Question.

1. Does the Council support the TCHPB's recommended 60-day stay on the issuance of demolition permit?

The following considerations are offered to assist Council's deliberation:

In favor of the full 60-day stay: A 60-day stay ending September 12, 2026, allows for public input and for the applicant and interested parties to explore whether alternatives to demolition exist.

In favor of a shorter stay or no stay: Because this is a remodel of an existing home, a stay would have little practical benefit and would unnecessarily incur additional expense on the landowner by delaying construction. Their building permit (B26-0178) has been reviewed and approved.

Possible Alternatives

Alternative 1: The Council may impose a stay of fewer than 60 days. Council may set any stay between one and 100 days. A shorter stay would reduce the time available for public input and alternatives exploration but would allow the applicant to proceed with demolition sooner. If Council is inclined toward a shorter stay, staff recommend specifying the exact number of days in the motion so the end date is unambiguous.

Alternative 2: The Council may elect not to impose a stay. Council may determine that no stay is appropriate, in which case the demolition permit would proceed through the normal permitting process without delay. Council should be aware that this option foregoes the opportunity for public comment.

Comprehensive Plan & Priority Alignment.

The Comprehensive Plan addresses historic preservation under Chapter 4 – Community Character, with the following policies:

- Policy 4.5a: Identify and preserve historically significant structures and sites;
- Policy 4.5.b: Support the Historic Preservation Board; and
- Policy 4.5.c: Enhance historic preservation education, outreach, and awareness.

Staff do not identify tension between this item and other Comprehensive Plan goals.

Fiscal Impact.

There is no fiscal impact to the Town of this item.

Staff Impact.

The impact of the demolition permit process falls in the Planning & Building Department. This application required approximately 9 hours of staff time from the Department. Staff does not anticipate a workload conflict with existing Council-directed priorities.

Attachments or Links.

1. Demolition permit application
2. Recommendation from TCHPB (email)

Suggested Motion

I move to **approve** a stay of **(0-100) DAYS**, beginning July 14, 2026, for the demolition of portions of the structure at 700 East Pearl Avenue (DEM26-0012) as presented in this staff report dated August 3, 2026.



DEMOLITION PERMIT APPLICATION
Planning & Building Department
Building Division

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

For Office Use Only

Permit No.		Permit Fee:		Date Received:		Date Due:	
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APPLICABILITY. The purpose of the Demolition Permit is to review and permit demolition of structures and utilities in accordance with Town of Jackson Municipal Code Section 15.38. Submit completed application package to townbuilding@jacksonwy.gov

When is a Demolition Permit Required?

Demolition includes the act of demolishing or removing (including removals without destruction of the component elements of the structure):

- Fifty percent or more of the exterior walls of a building as measured continuously around the building coverage; or
- Fifty percent or more of the roof area as measured in plan view (defined as the view of a building from directly above which reveals the outer perimeter of building roof areas to be measured across a horizontal plane); or
- Any exterior wall facing a public street or right of way.

PROJECT INFORMATION.

Physical Address: 700 E Peal AVE.

PIDN: 22-41-16-34-1-15-006 Original Year Built: 1967-77 GIS PHOTOS

Please answer the following questions to the best of your ability if unknown please write UNKNOWN.

Years and Description of any Additions: SOUTH ADDITION '78-'83 (GIS PHOTOS)

Years and Description of any Remodels: WINDOW WELLS 2025

Years and Description of any other Demolitions: N/A

PROJECT DESCRIPTION. Describe the precise nature of the proposed activity.

Existing house remodel and addition

APPLICANT/AGENT. This is the responsible party for the permit, bonding, inspections, and execution of the work.

Name: N/A Phone: _____

Mailing Address: _____ ZIP: _____

E-mail: _____

**If applicant is other than owner, a notarized Town of Jackson Letter of Authorization must accompany this application. Only the Owner or their authorized agent may sign the application.*

PROPERTY OWNER. If other than APPLICANT

Property Owner: Freer Family Trust Phone: 704 564 7694

Mailing Address: PO Box 4099 Jackson, WY ZIP: 83001-4099

E-mail: _____

CONTRACTOR.

Name: SHAW WY. Phone: 307.733.8401

E-mail: brettmcdonough@shawwyoming.com License: _____

NOTICES. <i>The following information should be considered with any demolition permit application.</i>	
A bond for the cost to abandon the water and sewer services as determined by Town Engineering is due at permit issuance.	
An Encroachment (Public Right-of-Way Permit) must be submitted prior to any work within the right-of-way.	
All work to be completed in accordance with the IBC Section 3303.	
All public and commercial / multifamily facilities must be inspected by a trained professional for the presence of asbestos prior to demolition. For more information contact the Asbestos Coordinator with the Wyoming DEQ Air Quality Division 307-777-7394.	
A notification of Demolition form may be required to be sent to Asbestos.notice@wyo.gov 10-working days before the start of any demolition whether asbestos is present or not.	
Performing demolition work without a permit may result in higher permit fees, fines, and/or loss of business license.	
After Issuance permit is valid for 180 days.	
Permit Fee is due at time of permit issuance.	
A 48-hour advanced notice is required to deliver demolition material to the County transfer station. Please call 307-733-7172.	
DEMOLITION PERMIT SUBMITTAL REQUIREMENTS. <i>In order to be considered complete the following elements must be supplied with this application (Please contact the Engineering Division at 733-3079 with any questions regarding this permit):</i>	
APPLICANT INITIALS	Application shall include the following items or acknowledgments:
<u>N/A</u>	Notarized Town of Jackson Letter off Authorization, if applicant is other than the owner.
<u>GF</u>	Copy or receipt of written notification to the Wyoming DEQ Asbestos program. <i>See attached form for submittal to DEQ.</i>
<u>GF</u>	Demolition Plans showing: - Extent of the demolition work ✓ - Existing utilities to be abandoned and patching in the right-of way. <i>N/A</i> - Finished Conditions Plan or Statement: the vacant lot shall be backfilled and maintained to the existing grade or without slopes steeper than 2:1. <i>N/A</i> - Construction access point and access stabilization methods ✓ - Equipment parking areas ✓ - Location of construction and silt fencing ✓
<u>GF</u>	Photographs of existing exterior conditions: elevation photos (front, back, sides) of each building or structure intended for removal. If multiple structures or features are proposed for demolition, overall site photographs should be provided for context.

APPLICANT'S SIGNATURE, CERTIFICATION, AND AUTHORIZATION

Under penalty of perjury I hereby certify that I have read this application and state that, to the best of my knowledge, all of the information herein is true and correct and I swear that any information which may be hereafter given by me in hearing before the Planning Commission of Town of Jackson or the Town Council of the Town of Jackson shall be truthful and correct. I agree to comply with all Town, State, and Federal laws relating to the subject matter of this application and hereby authorize representatives of the Town of Jackson to enter the property described herein during normal business hours, after making a reasonable effort to contact the owner/applicant prior to entering the property.

In signing this application, I acknowledge that the Town's acceptance of this application does not constitute approval of a permit. I agree not to commence any work for which this application is being made prior to approval of this application by the appropriate Town agencies and payment of any fees due.


Signature of Owner or Authorized Applicant/Agent

Gregory Freer
Name Printed

6/10/26
Date

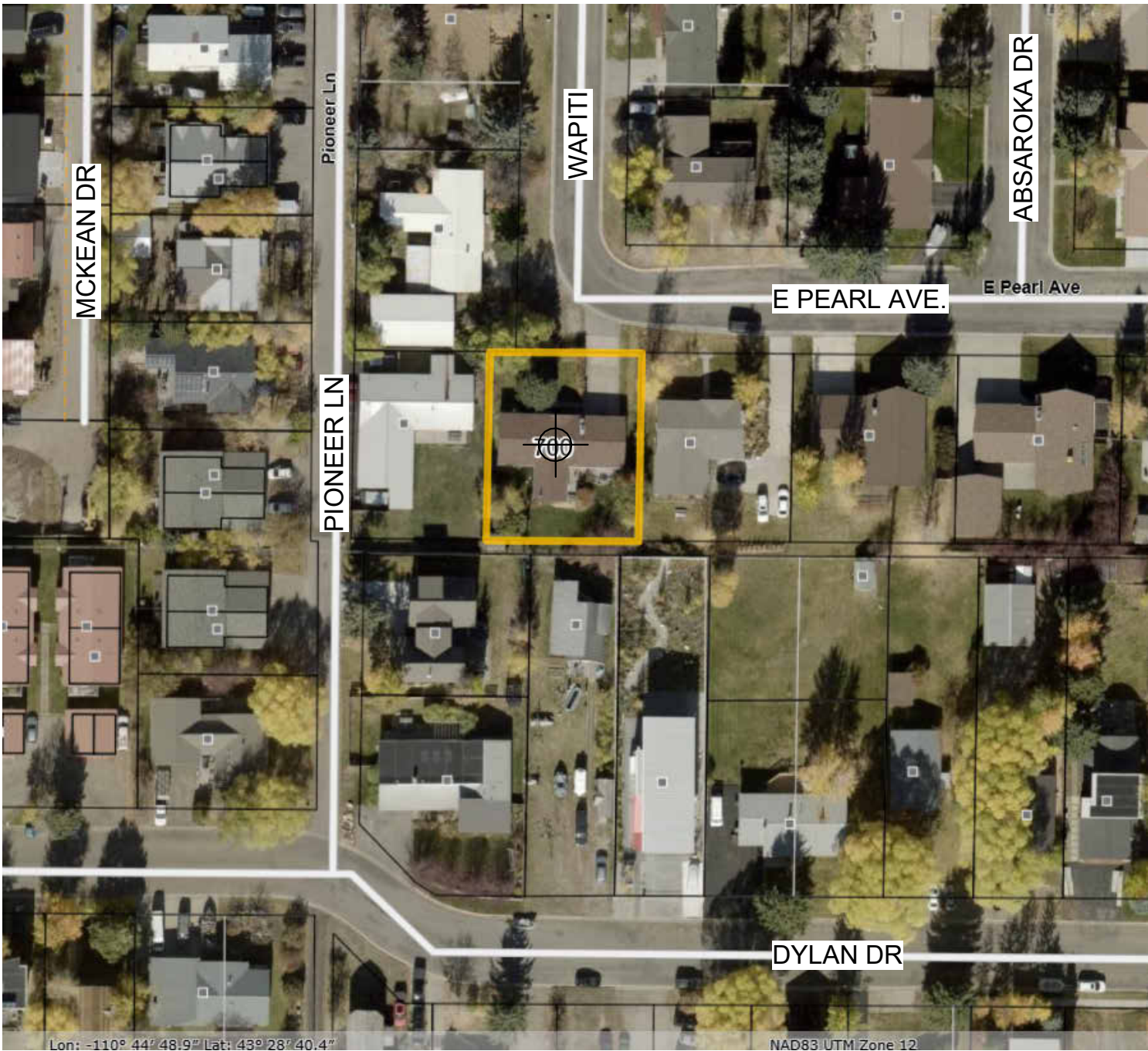
Owner
Title



PROJECT LOCATION

700 E PEARL AVENUE,
JACKSON, WY 83001
PIDN: 22-41-16-34-1-15-006

VICINITY MAP: Locator



SHEET INDEX	
Sheet Number	Sheet Name
01 GENERAL	
G101	COVER SHEET
G101.1	IWUI REVIEW
01.5 ARCH DEMO	
AD101	DEMO PLANS
AD102	DEMO PLAN ROOF
AD 201	DEMO ELEVATIONS NORTH & SOUTH
AD 202	DEMO ELEVATIONS EAST & WEST
02 ARCHITECTURE	
A100.1	EXISTING SITE PLAN
A100.2	PROPOSED SITE PLAN
A101	FIRST FLOOR PLAN
A102	FLOOR PLAN MASTER BEDROOM & BASEMENT
A103	ROOF PLAN
A201	ELEVATIONS NORTH & SOUTH
A202	ELEVATIONS EAST & WEST
A301	BUILDING SECTIONS
A401	WALL SECTIONS
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S1.1	STRUCTURAL SCHEDULE
S1.2	TYPICAL STRUCTURAL DETAILS
S1.3	TYPICAL STRUCTURAL DETAILS
S1.4	TYPICAL STRUCTURAL DETAILS
S2.0	FOUNDATION
S2.1	MAIN LEVEL FLOOR
S2.2	MAIN LEVEL FRAMING
S2.3	SECOND LEVEL FLOOR
S2.4	SECOND LEVEL FRAMING
S2.5	ROOF FRAMING
S3.0	CONCRETE DETAILS
S4.0	FRAMING DETAILS
S4.1	FRAMING DETAILS
S5.0	STEEL DETAILS
05 PLUMBING	
P101	MAIN LEVEL PLUMBING FIXTURE PLAN
P102	BASEMENT & MASTER PLUMBING FIXTURE PLAN
07 ELECTRICAL	
E1.0	LOAD CALC AND ONE LINE-DIAGRAM
E201	MIAN FLOOR LIGHTING & POWER PLAN
E202	BASEMENT & MASTER LIGHTING & POWER PLAN
E203	MIAN FLOOR POWER PLAN
E204	BASEMENT & MASTER POWER PLAN

OWNER

FREER FAMILY TRUST
700 EAST PEARL AVE.
P.O. BOX 4099 JACKSON, WY
(83001)

ARCHITECT

Hoyt Architects
1110 Maple Way Suite F
PO Box 7364 (83002)
Jackson, WY (83001)
307.733.9955
bradh@hoytarchitects.design

STRUCTURAL ENGINEER

Jorgensen Associates
PO Box 9550
1315 S Hwy 89, Suite 201
Jackson, WY 83001
307.733.5150

MECHANICAL ENGINEER

JTEC
140 E. Broadway Suite 25
Jackson, Wyoming 83001
PO Box 4594
Jackson, WY (83001)
307.699.1110

ELECTRICAL ENGINEER

MB Engineering LLC
645 W 25th St.
Idaho Falls, ID (83402)
208.545.8383

GENERAL CONTRACTOR

Shaw Wyoming
460 South Cache
Jackson, WY (83001)
307.733.2472

GENERAL CONSTRUCTION NOTES

- THIS PROJECT SHALL COMPLY WITH THE 2024 VERSION OF THE IRC AND THE CURRENT TETON COUNTY LDRS INCLUDING ALL AMENDMENTS. ANY BUILDING OFFICIAL, SUBCONTRACTOR OR TRADES PERSON NOTING DISCREPANCIES SHALL NOTIFY THE ARCHITECT IMMEDIATELY UPON DISCOVERY.
- CONTRACTOR SHALL COORDINATE ALL REQUIRED INSPECTIONS BY T.O.J. COUNTY BUILDING, FIRE DEPARTMENTS AND ANY OTHER GOVERNING AUTHORITIES, AS NECESSARY.
- ALL CONSTRUCTION DEBRIS IS TO BE STOCKPILED NEATLY ON SITE UNTIL DISPOSAL, WHICH SHALL BE DONE AT COUNTY LANDFILL OR RECYCLING FACILITY ONLY. NO DEBRIS IS TO BE DISPOSED OF IN LOCAL WASTE COLLECTION FACILITIES.
- EXCEPT IN INTERIOR ELEVATIONS, AND UNLESS OTHERWISE NOTED, ALL DIMENSIONS ARE GIVEN TO FACE OF ROUGH FRAMING, CENTERLINE OF COLUMNS, OR FACE OF CONCRETE AND C.M.U. WALL. INTERIOR ELEVATION DIMENSIONS ARE GIVEN TO FACE OF FINISH MATERIAL. GIVEN DIMENSIONS TAKE PRECEDENCE OVER SCALE. STRUCTURAL DRAWINGS WITH ARCHITECTURAL DRAWINGS PRIOR TO CONSTRUCTION, VERIFY DISCREPANCIES WITH ARCHITECT.
- CONTRACTOR SHALL PROVIDE STORAGE FOR ALL BUILDING MATERIALS IN ACCORDANCE WITH MANUFACTURER'S RECOMMENDATIONS. STORAGE OF SUPPLIES SHALL REMAIN DRY.
- ALL SUBSTITUTIONS ARE TO BE APPROVED BY ARCHITECT/OWNER. ALONG WITH WRITTEN REQUESTS CONTRACTOR SHALL PROVIDE ALL INFORMATION REGARDING THE SUBSTITUTION IN QUESTION, INCLUDING COST, AVAILABILITY AND REASON FOR SUBSTITUTION. SOLID WOOD BLOCKING, INSULATION OR OTHER FIRESTOP MATERIAL IS TO BE PROVIDED BETWEEN STORIES, BETWEEN TOP STORY AND ROOF SPACE, BETWEEN STAIR STRINGERS AT TOP AND BOTTOM, BETWEEN STUDS ALONG STAIR RUNS AND AT ALL OTHER PLACES THAT COULD ALLOW THE PASSAGE OF FLAME. FIRESTOPS BETWEEN CHIMNEY AND WOOD FRAME SHALL BE NON-COMBUSTIBLE. CONTRACTOR SHALL PROVIDE SAMPLES OF ALL FINISHES AND STAIN COLORS FOR APPROVAL BY ARCHITECT/OWNER. THIS INCLUDES BUT IS NOT LIMITED TO INTERIOR AND EXTERIOR STAINS, INTERIOR PAINT, SHEETROCK TEXTURES, CHEMICALLY APPLIED METAL PATINAS, AND STONE VENEER MATERIAL, & MASONRY TECHNIQUE.
- PROVIDE GROUNDING SYSTEM AS PER NEC ARTICLE 250-1C, SIZED IN ACCORDANCE WITH TABLE 250-94. ATTACHED TO REBAR IN CONCRETE FOOTING, ALSO ATTACHED TO SINGLE DRIVEN GROUNDING ROD WITH SECONDARY GROUNDING PROTECTIONS AT METAL WATER SUPPLY SYSTEM.
- ALL MATERIALS SHALL BE INSTALLED PER MANUFACTURER'S RECOMMENDATIONS AND IN ACCORDANCE WITH WARRANTY GUIDELINES.
- SITE MATERIAL SHALL BE OVER-EXCAVATED AND ENGINEER FILL ADDED PER GEOTECH REPORT AS APPLICABLE TO PREVENT SETTLING OF FINISH GRADE, WALKS, DRIVEWAYS, TERRACES, ETC.
- CONTRACTOR RESPONSIBLE FOR PROVIDING, COORDINATION AND SUPERVISING TRENCHING OF UTILITIES AND SERVICES TO AND FROM BUILDING. COORDINATION SHALL INCLUDE CONTRACTOR'S REASONABLE EFFORTS TO COMBINE AS MANY DIFFERENT UTILITIES IN COMMON TRENCHES AS PRACTICAL AND GOOD PRACTICE PERMIT.
- CONTRACTOR TO ABIDE BY ALL CONSTRUCTION GUIDELINES FOR THE DEVELOPMENT. NO PARKING ON STREET, NO DOGS ON JOBSITE, ETC.
- ALL UNDER FLOOR WALLS SHALL HAVE PERSONNEL OPENINGS WITH MINIMUM DIMENSIONS OF 24"x30". ACCESS AND CLEAR PATH OF TRAVEL (24"x30") NOT TO EXCEED 20' IN LENGTH SHALL BE REQUIRED TO ALL MECHANICAL EQUIPMENT LOCATED IN CRAWLSPACE.
- GENERAL PLAN NOTES:
DO NOT SCALE DRAWINGS. CONTACT ARCHITECT FOR ANY UNDOCUMENTED DIMENSIONS OR CLARIFICATIONS OF ANY DIMENSIONAL DISCREPANCIES. LARGE SCALE DRAWINGS TAKE PRECEDENCE OVER SMALLER SCALE DRAWINGS.
ALL INTERIOR PARTITIONS ARE FRAMED WITH 2X6 WOOD STUDS UNLESS NOTED/DIMENSIONED OTHERWISE.
- THE CONTRACTOR SHALL COORDINATE THE SPACING OF CEILING AND FLOOR JOISTS WITH LIGHTING FIXTURES, MECHANICAL OPENINGS, AND ANY OTHER POTENTIAL CONFLICT. (SEE STRUCTURAL, MECHANICAL, LIGHTING, AND REFLECTED CEILING PLANS)
- COORDINATE ALL WINDOWS AND DOORS WITH SCHEDULES TO DETERMINE ROUGH OPENING DIMENSIONS.
- WHERE SHOWN, FURNITURE IS FOR REFERENCE ONLY AND NOT IN CONTRACT.
- CRAWL SPACE ACCESS DOORS FROM CONDITIONED SPACE TO UNCONDITIONED SPACE SHALL BE WEATHER STRIPPED AND INSULATED TO A LEVEL EQUIVALENT TO THE INSULATION ON THE SURROUNDING SURFACES AND THE INSULATION SHALL BE RIGIDLY ATTACHED TO THE ACCESS DOOR.

CODES UTILIZED

ZONING DISTRICT - NL-3
OCCUPANCY/USE - SINGLE FAMILY RESIDENCE
TYPE OF CONSTRUCTION - VB
FIRE SPRINKLERS - NO
CODES UTILIZED - IECC 2021, NEC 2020, IMC 2024, IPC 2024, IRC 2024
SEISMIC DESIGN - CATEGORY D
SNOW LOAD - 84 PSF + DRIFTING
WIND LOAD - Vult=115 MPH, Vasd=90MPH
LOT AREA - 0.21ac
FROST LINE DEPTH - 34 INCHES
EXISTING NUMBER OF STORIES - 1
PROPOSED NUMBER OF STORIES - 2

AREA CALCULATIONS

	EXISTING	NEW	TOTAL
BASEMENT	1,075 sf	0 sf	1,075 sf
MAIN LEVEL	1,459 sf	-10 sf	1,449 sf
UPPER LEVEL	0 sf	718 sf	718 sf.
TOTAL HABITABLE	2,534 sf	708 sf	3,242 sf
GARAGE	630 sf	0 sf	630 sf
MECHANICAL			
TOTAL GROSS	3,164 sf	708 sf	3,872 sf
DECKS OR PORCHES	285 sf	-155 sf	130 sf

SITE: 0.21 ACRES: 9,148 sf

FAR CALCULATION

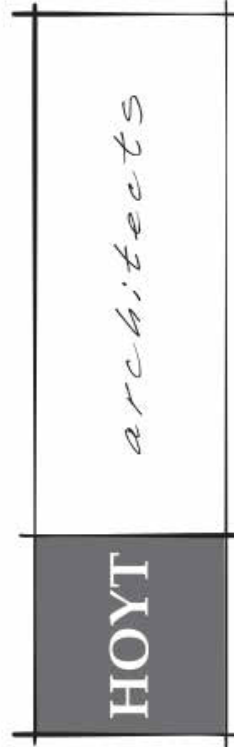
FAR SITE: .21ac
ALLOWED 0.40 x 0.21ac x 4,3560 sf/a = 3,659 sf
EXISTING 2,089 sf ≤ 3,659 sf = OK

PROPOSED 2,797 sf ≤ 3,659 sf = OK

LSR CALCULATION

ALLOWED ≥ 45%
PROPOSED = 5,525 sf = 60.4% = OK

TYPE OF CONSTRUCTION: VB



Jackson Wyoming
307.733.9955

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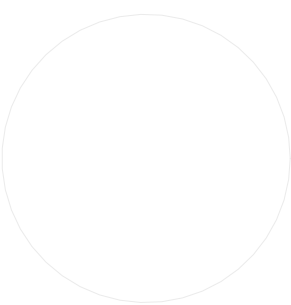
PERMIT SET

Project Status

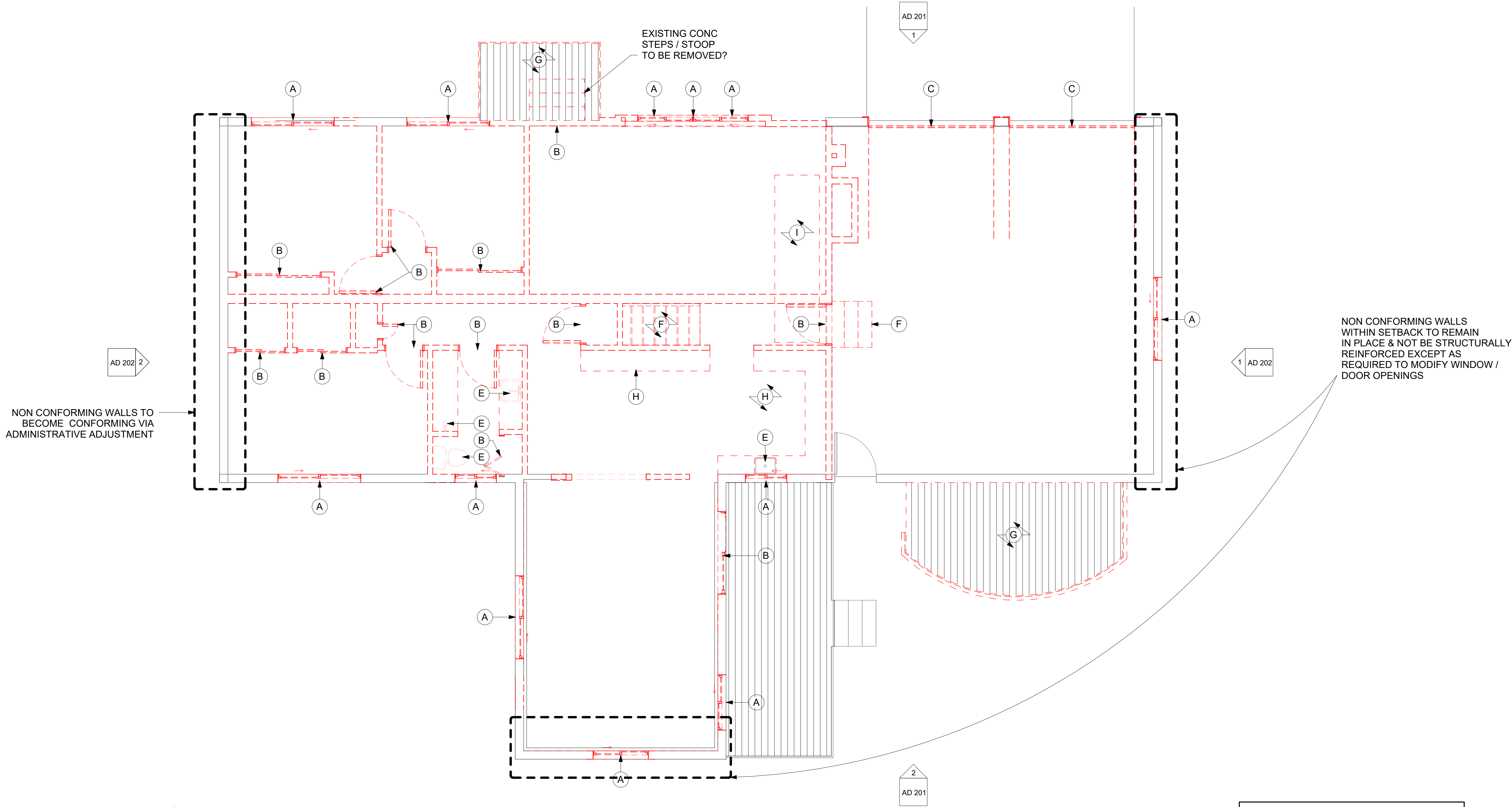
Date JUNE 12, 2026
Drawn by SL
Checked by BH
REVISIONS

No.	Description	Date

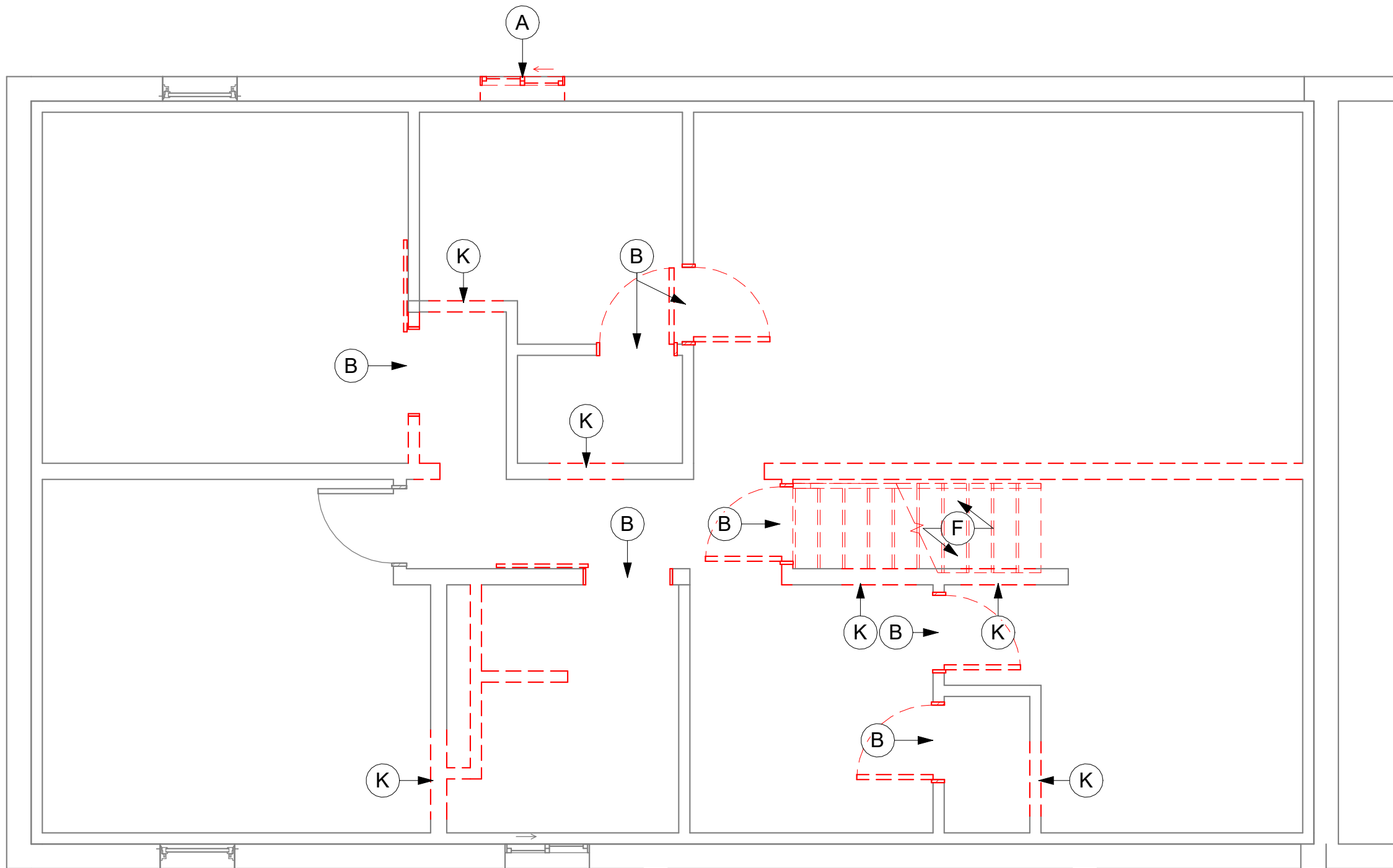
COVER SHEET



No.	Description	Date



1 DEMO PLAN FIRST FLOOR
1/4" = 1'-0"



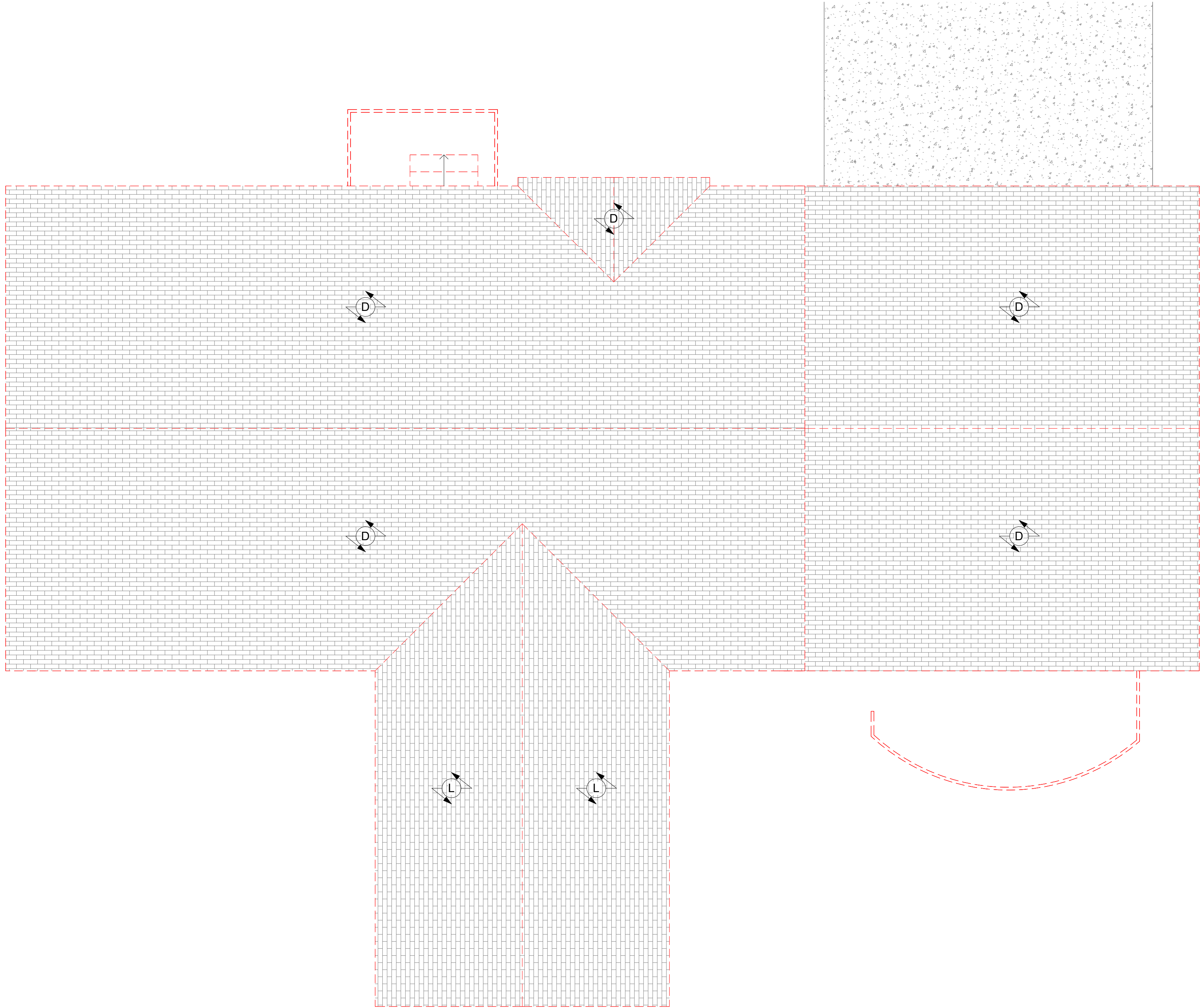
2 BASEMENT
1/4" = 1'-0"



DEMO LEGEND	
(A)	DEMO EXISTING WINDOW
(B)	DEMO EXISTING DOOR
(C)	DEMO EXISTING OVERHEAD DOOR; PREP FOR NEW
(D)	DEMO EXISTING ROOF
(E)	DEMO EXISTING PLUMBING FIXTURE
(F)	DEMO EXISTING STAIRS
(G)	DEMO EXISTING DECK
(H)	DEMO CASEWORK
(I)	DEMO FLOOR - PREP FOR NEW STAIRS
(J)	DEMO WALL - PREP FOR NEW WINDOW
(K)	DEMO WALL - PREP FOR NEW DOOR
(L)	DEMO EXISTING ROOF SHINGLES - PREP FOR STANDING SEAM
(Solid line)	EXISTING WALL TO REMAIN
(Dashed line)	DEMO EXISTING WALL
(Dotted line)	DEMO EXISTING
(Thick solid line)	DEMO WALL - PREP FOR NEW WINDOW



1 DEMO ROOF PLAN
1/4" = 1'-0"



DEMO LEGEND

A

B

C

D

E

F

G

H

I

J

K

L

EXISTING WALL TO REMAIN

DEMO EXISTING WALL

DEMO EXISTING

DEMO WALL - PREP FOR NEW WINDOW

DEMO EXISTING WINDOW

DEMO EXISTING DOOR

DEMO EXISTING OVERHEAD DOOR; PREP FOR NEW

DEMO EXISTING ROOF

DEMO EXISTING PLUMBING FIXTURE

DEMO EXISTING STAIRS

DEMO EXISTING DECK

DEMO CASEWORK

DEMO FLOOR - PREP FOR NEW STAIRS

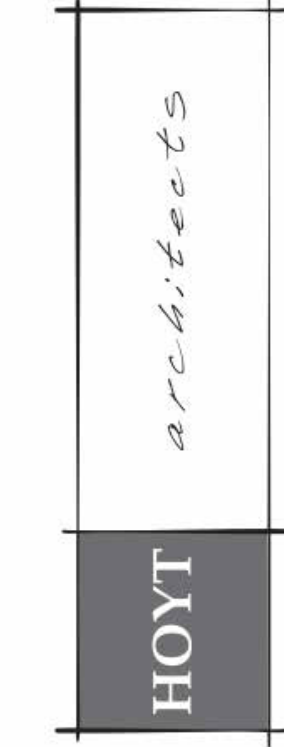
DEMO WALL - PREP FOR NEW WINDOW

DEMO WALL - PREP FOR NEW DOOR

DEMO EXISTING ROOF SHINGLES - PREP FOR STANDING SEAM

No.	Description	Date

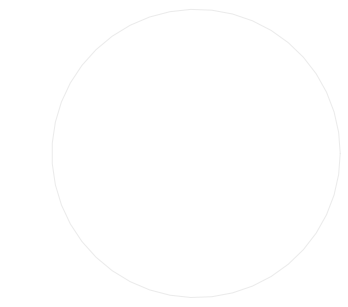
DEMO PLAN ROOF



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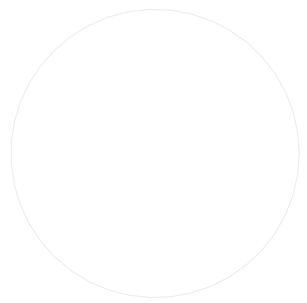
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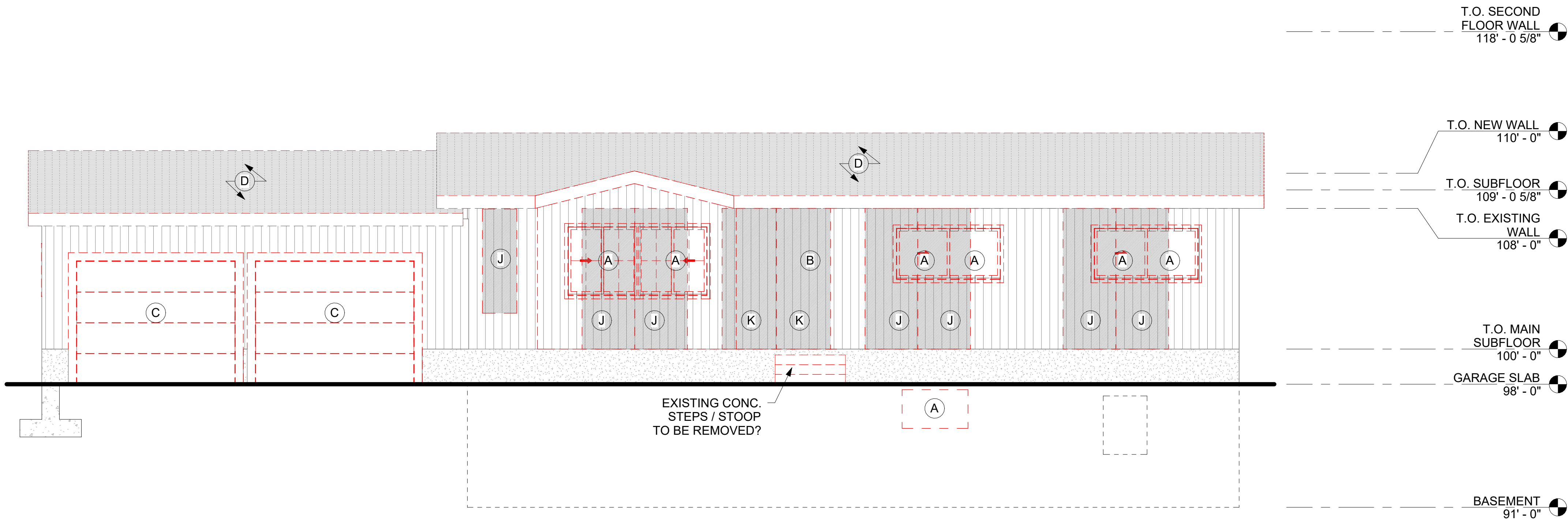
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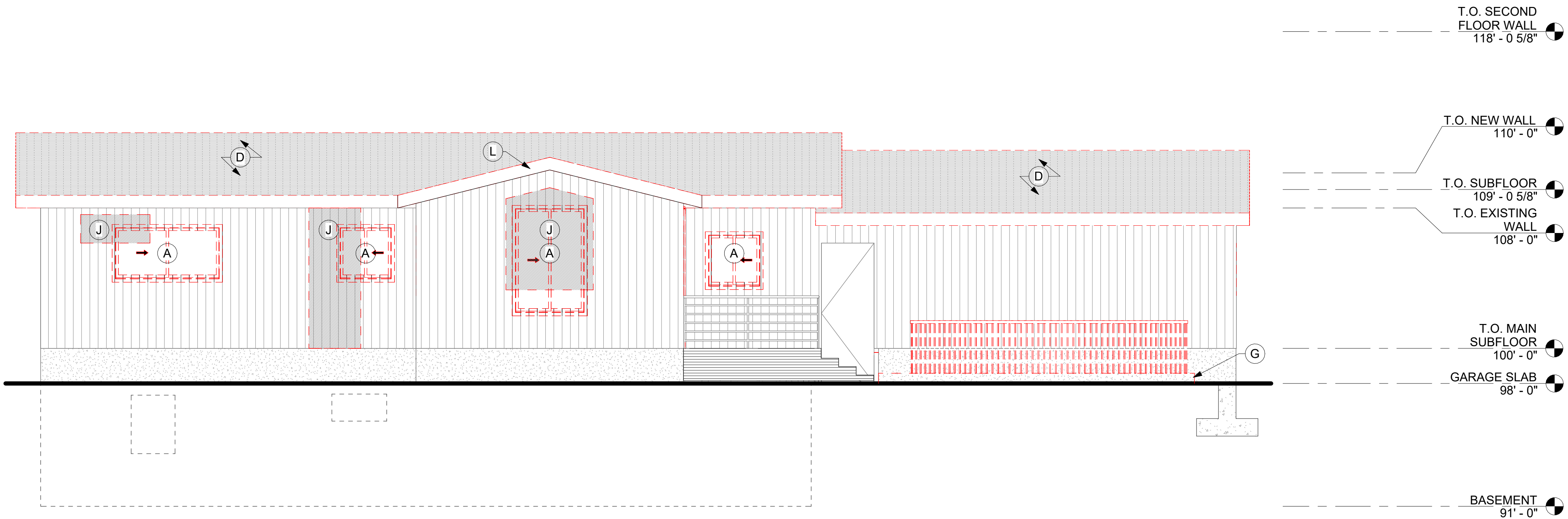
No.	Description	Date

DEMO ELEVATIONS
NORTH & SOUTH

AD 201

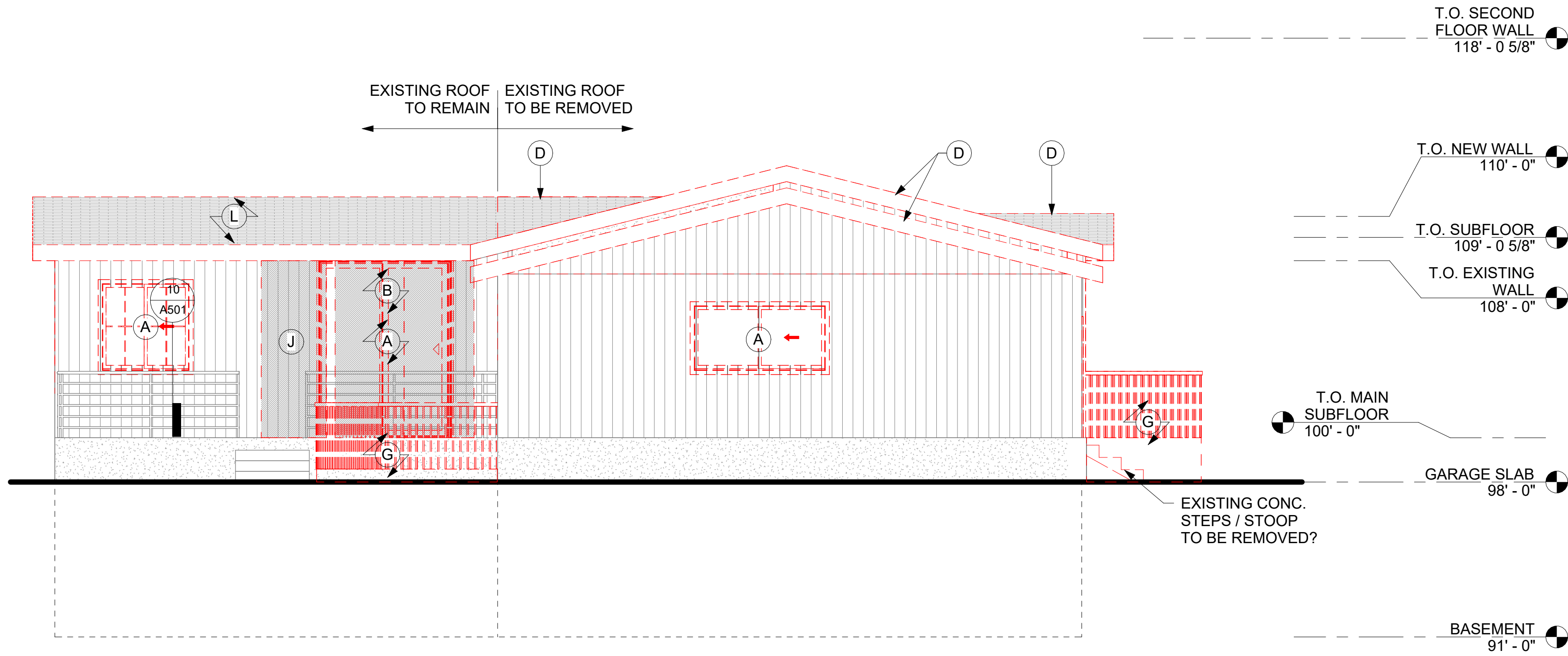


1 DEMO NORTH ELEVATION
1/4" = 1'-0"

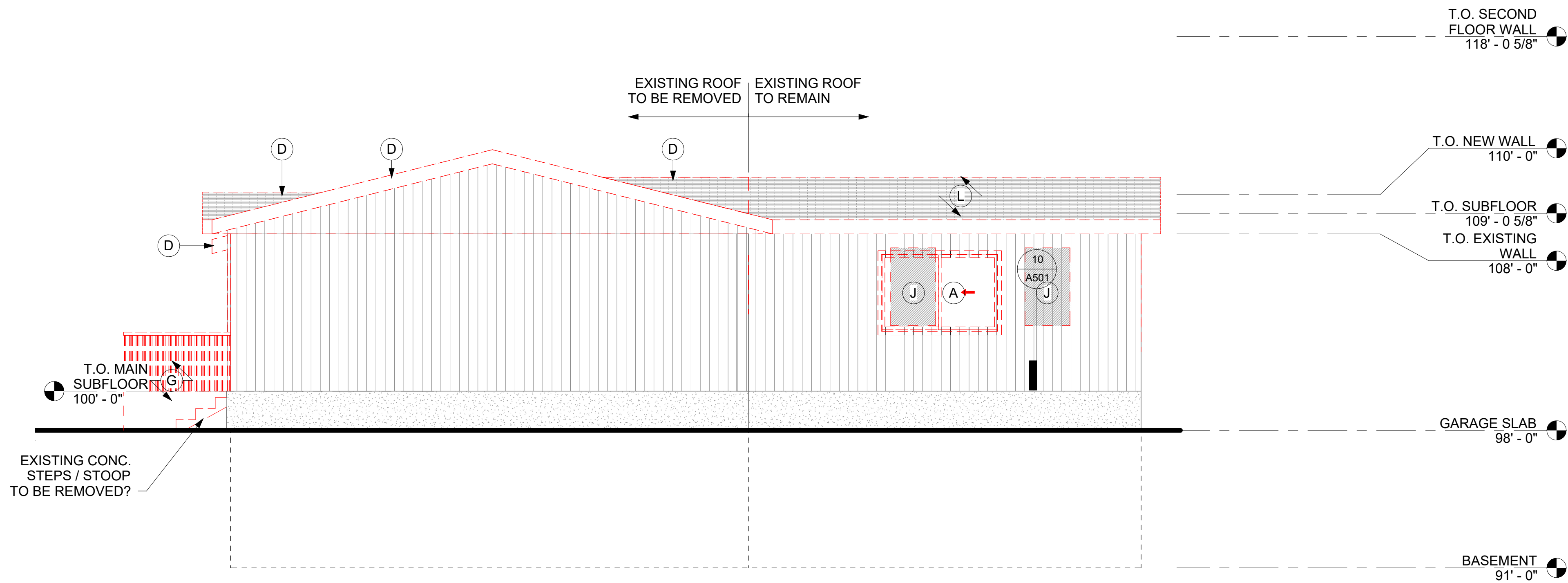


2 DEMO SOUTH ELEVATION
1/4" = 1'-0"

DEMO LEGEND	
(A)	DEMO EXISTING WINDOW
(B)	DEMO EXISTING DOOR
(C)	DEMO EXISTING OVERHEAD DOOR; PREP FOR NEW
(D)	DEMO EXISTING ROOF
(E)	DEMO EXISTING PLUMBING FIXTURE
(F)	DEMO EXISTING STAIRS
(G)	DEMO EXISTING DECK
(H)	DEMO CASEWORK
(I)	DEMO FLOOR - PREP FOR NEW STAIRS
(J)	DEMO WALL - PREP FOR NEW WINDOW
(K)	DEMO WALL - PREP FOR NEW DOOR
(L)	DEMO EXISTING ROOF SHINGLES - PREP FOR STANDING SEAM
	EXISTING WALL TO REMAIN
	DEMO EXISTING WALL
	DEMO EXISTING
	DEMO WALL - PREP FOR NEW WINDOW



1 DEMO EAST ELEVATION
1/4" = 1'-0"



2 DEMO WEST ELEVATION
1/4" = 1'-0"

DEMO LEGEND

A

B

C

D

E

F

G

H

I

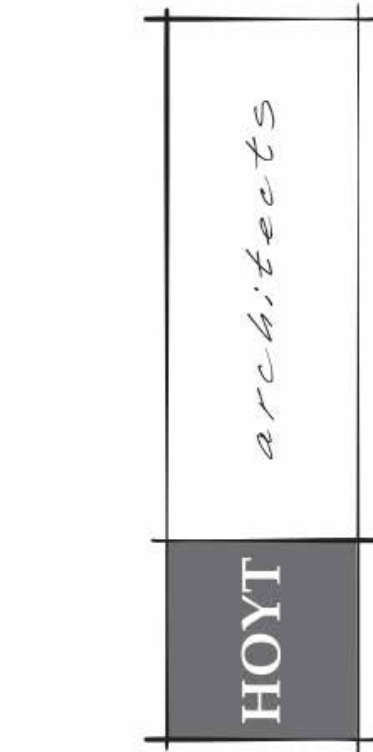
J

K

L

DEMO EXISTING WINDOW
DEMO EXISTING DOOR
DEMO EXISTING OVERHEAD DOOR; PREP FOR NEW
DEMO EXISTING ROOF
DEMO EXISTING PLUMBING FIXTURE
DEMO EXISTING STAIRS
DEMO EXISTING DECK
DEMO CASEWORK
DEMO FLOOR - PREP FOR NEW STAIRS
DEMO WALL - PREP FOR NEW WINDOW
DEMO WALL - PREP FOR NEW DOOR
DEMO EXISTING ROOF SHINGLES - PREP FOR STANDING SEAM

EXISTING WALL TO REMAIN
DEMO EXISTING WALL
DEMO EXISTING
DEMO WALL - PREP FOR NEW WINDOW



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No.	Description	Date

DEMO ELEVATIONS
EAST & WEST

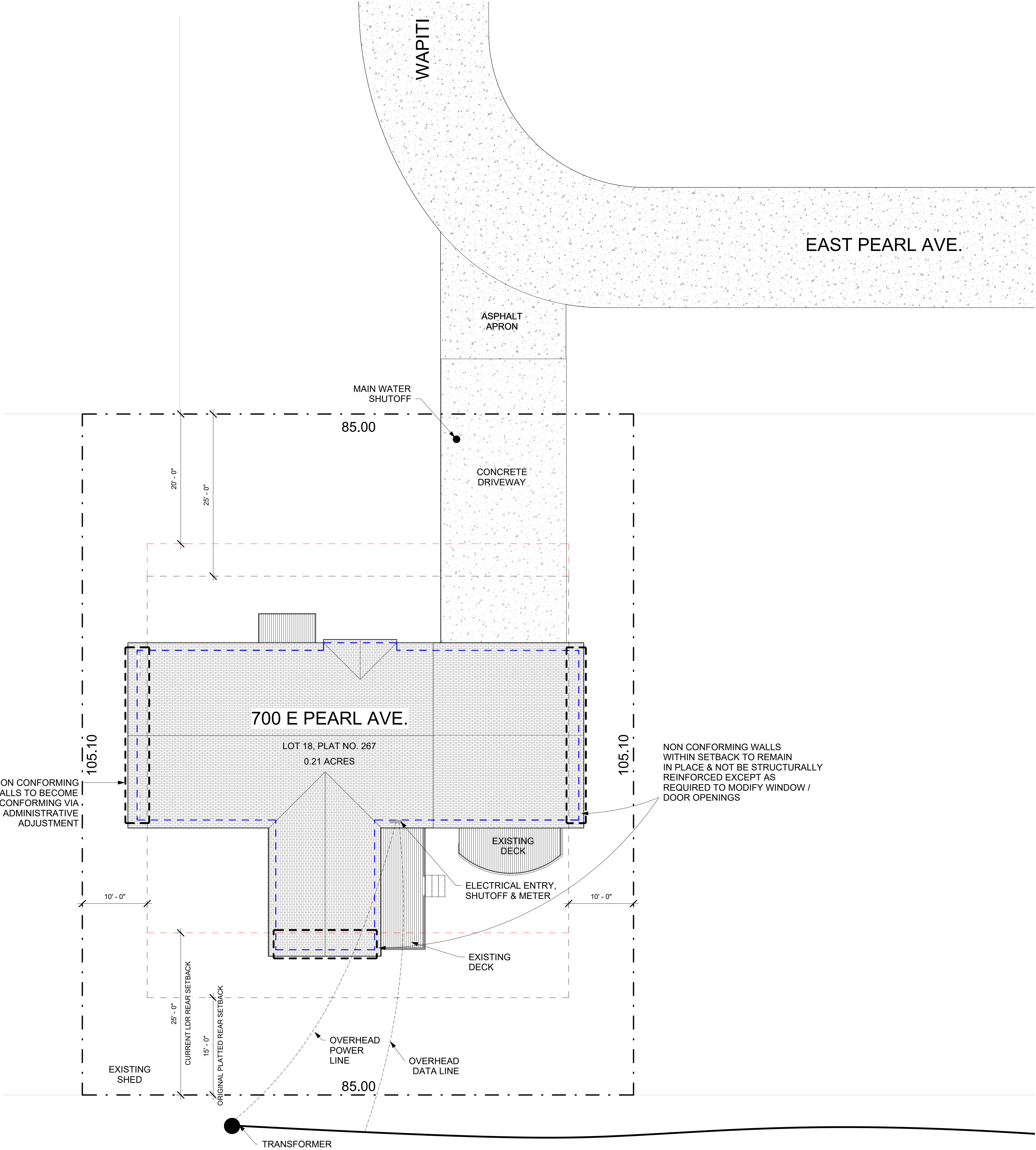
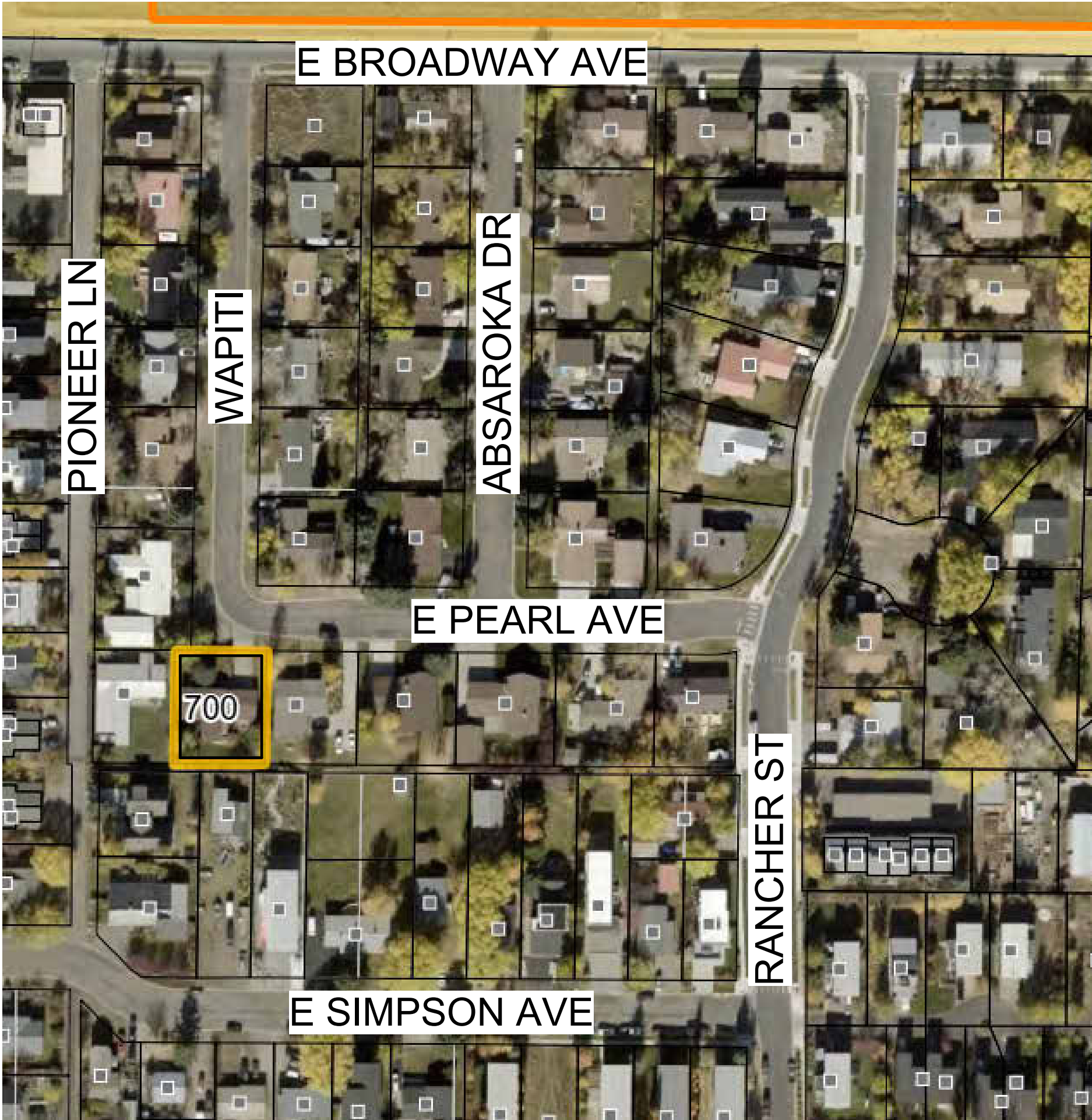
AD 202

LDR COMPLIANCE

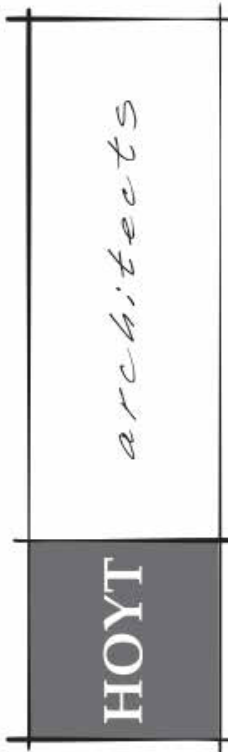
	LDR STANDARD	EXISTING	PROPOSED
FLOOR AREA RATIO (FAR)	40%	38.2%	31.4%
LANDSCAPE SURFACE RATIO (LSR)	45%	61.8%	60.4%

DEMO LEGEND

- PROPERTY LINES
- CURRENT TOWN OF JACKSON PRIMARY BUILDING STREET SETBACK
- PLATTED PRIMARY BUILDING FRONT SETBACK LINE
- BUILDING FOOTPRINT
- SECOND FLOOR FOOTPRINT
- SNOW STORAGE



1 EXISTING SITE PLAN
1/8" = 1'-0"



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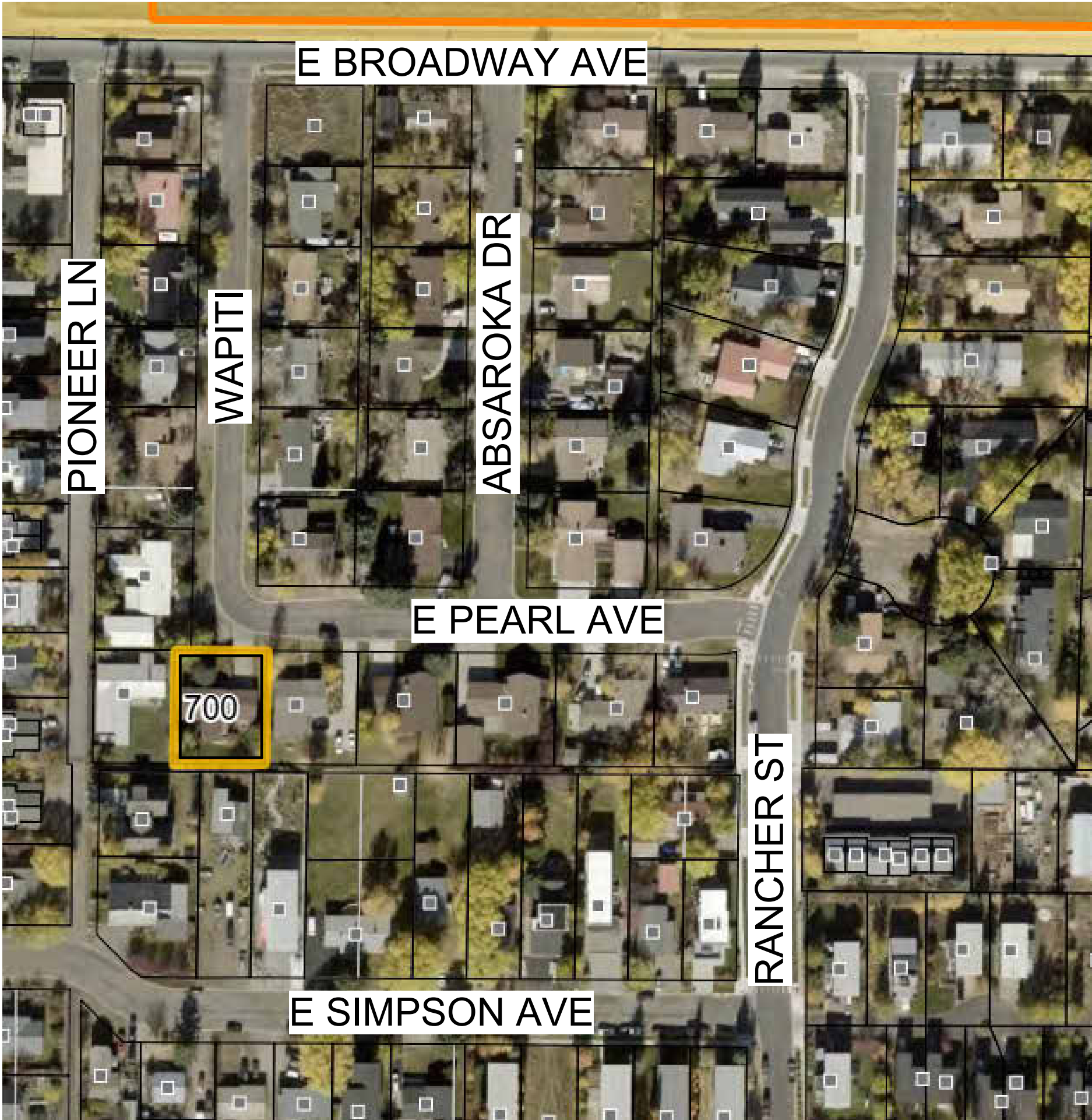
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Project Status

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Checked by BH
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No.	Description	Date

EXISTING SITE
PLAN

A100.1



DEMO LEGEND

PROPERTY LINES

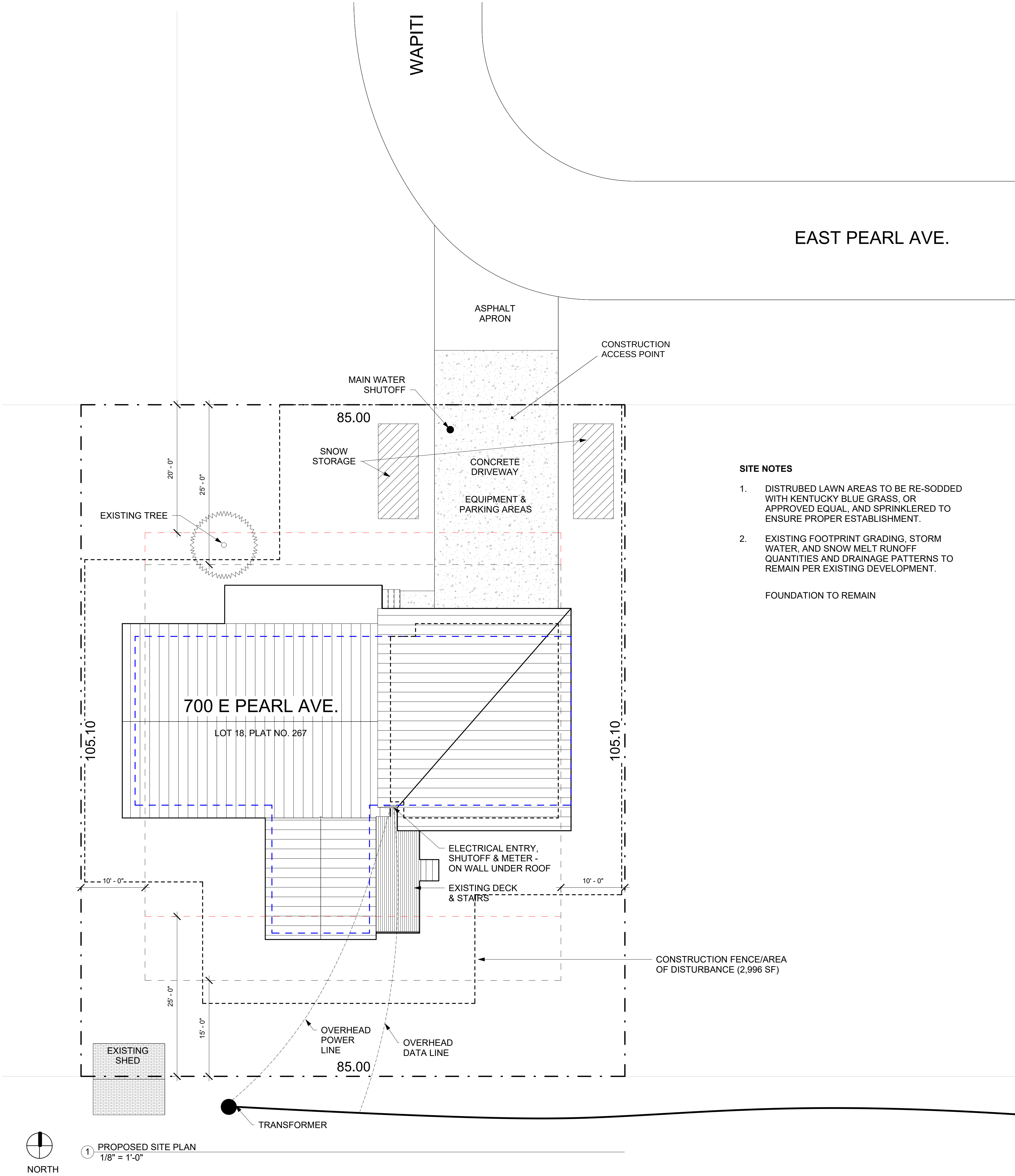
CURRENT TOWN OF JACKSON PRIMARY BUILDING STREET SETBACK

PLATTED PRIMARY BUILDING FRONT SETBACK LINE

BUILDING FOOTPRINT

SECOND FLOOR FOOTPRINT

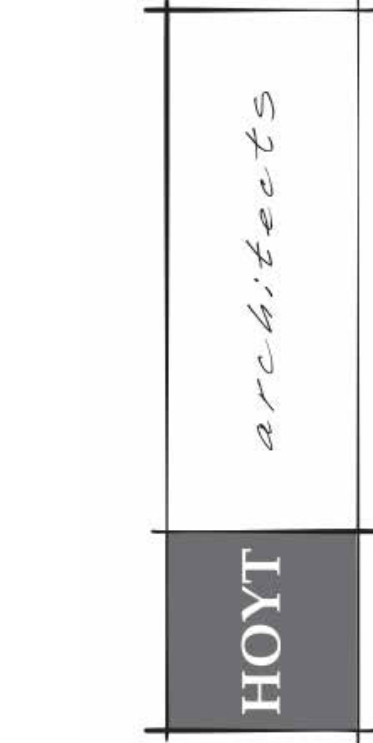
SNOW STORAGE



- SITE NOTES
1.

DISTRUBED LAWN AREAS TO BE RE-SODDED WITH KENTUCKY BLUE GRASS, OR APPROVED EQUAL, AND SPRINKLERED TO ENSURE PROPER ESTABLISHMENT.
2.

EXISTING FOOTPRINT GRADING, STORM WATER, AND SNOW MELT RUNOFF QUANTITIES AND DRAINAGE PATTERNS TO REMAIN PER EXISTING DEVELOPMENT.
- FOUNDATION TO REMAIN



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No.	Description	Date

PROPOSED SITE
PLAN

A100.2

6/15/2026 4:32:49 PM













700

















Teton County Historic Preservation Board
Demolition Permit Recommendation for DEM26-0012: 700 E Pearl Ave
July 15, 2026

DEM26-0012: 700 E Pearl Ave

The resources identified in DEM26-0012: 700 E Pearl Ave, Wyoming, are found to be historically significant according to the Town of Jackson Designation Criteria to the Jackson Historic Register

The TCHPB recommends a 60 day stay in the issuance of a demolition permit for public comment and in order for the applicant, the TCHPB and other interested parties to explore alternatives to demolition.

If a stay is recommended:

The resources identified in Dem26-0012 are found to be historically significant according to the following Town of Jackson Designation Criteria: Age, 50+ years old.

Attached, please find Turn Stone Research's report with additional property information.

TCHPB DEMOLITION PERMIT REVIEW FORM

Permit #: DEM26-0012

Address: 700 E Pearl Avenue

Year Built: c.1974

Building(s) to be Demolished:

1. 700 E Pearl Avenue: frame residence (c.1974)

The property comprises Lot 18 of the Otto Nelson Subdivision (2nd filing). The roughly 0.20 acre lot is largely grassed, with mature trees and a concrete driveway access on from the corner of E Pearl Street on the north. The residence is in the center of the lot, and obscured by the mature vegetation on the roadway.

The 1,411sqft residence was constructed in 1974, and reflects elements of then-popular ranch-style architecture. The one-story layout with low-sloped roof, and diamond patterned window muntins help to illustrate this. Most notably, the stone veneer details are a local expression of this style. By 1983 a rear addition appears to have been added. The siding appears to have been replaced with vinyl, and the roof material and soffits appear to have been replaced. The windows and doors appear largely original. There have been few changes to the overall style and massing of the building since its construction. It retains integrity of location, setting, design, feeling, and association with some impacts to materials and workmanship.

The residence is more than 50 years old and retains enough integrity to be historically significant. Its significance can be evaluated for its association with the broad patterns of the town of Jackson's development, and for its association with significant individuals.

Property Notes: Lot 18 Otto Nelson Subdivision (2nd filing)

The residence at 700 E Pearl Avenue was constructed in 1974 for Shirley Moulton, a year after a devastating car crash that took the lives of her husband Reed and daughter Mary. Reed and Shirley Moulton married in 1945 and they lived on Mormon Row, where they raised their family. They continued to live at Mormon Row through the expansion of Grand Teton National Park, and held a life lease through Reed's father John Moulton. Reed and Shirley lived in the northern-most extant homestead, and John and Bartha Moulton lived in what's today known as the "pink house." Shirley and her sons continued ranching at Mormon Row until 1976, and cousins managed the ranch until John's death in 1993. After Reed's early death in 1973 Shirley moved into town fulltime, and later [died in 2025](#). Her family owned the house until March 2026.

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Building Department	Presenter:	Paul Anthony and Kelly Sluder
Agenda Item:	Amendments to Contractor Licensing Requirements	Public Comment:	Yes

Purpose or Policy Considerations

The item for consideration is to amend Title 15.36 Contractor Licensing to change the minimum requirements for contractors to perform work within the Town limits. More specifically, the proposal is to eliminate the Journeyman and Apprentice trade qualifications and to eliminate the current out-of-state reciprocity program.

Recommendations.

Staff recommend approval of the proposed amendments to Title 15.36.

Background

The Town's contractor licensing program began in 2004. It requires all people involved in a construction trade (residential or commercial construction, mechanical, plumbing, etc.) in the Town to obtain a Certificate of Qualification (COQ) to work as an Apprentice, Journeyman, or Master according to their experience and education. Managing this program has become increasingly time consuming for staff as the number of contractors increases, especially from non-local jurisdictions because verifying previous work qualifications for Apprentices and Journeyman from locations all over the West is proving increasingly unmanageable. Out-of-state contractors are also frequently in a hurry to get their COQ cards because they want to begin work immediately on a site and that puts significant strain on staff. In addition, as demand for construction labor continues to outpace local supply, resulting in more underqualified laborers on construction sites, staff are spending more time on enforcement of COQ cards. All of this is being done by a three-person Building Department that has not grown in 20 years despite the increases in the volume and complexity of projects.

The Board of Examiners (BOE), which was created when the contractor licensing program was adopted, has played an integral role in the implementation of the program. Its original purpose was to meet monthly and research and verify work experience for each contractor license and COQ application. It also served as a Board of Appeals under the Building Code to hear appeals of interpretations of the Building Code made by the Building Official. Members on the BOE had to personally verify each contractor application because there was not an approved International Code Council (ICC) testing standard for contractors when the licensing program was first started. To help fulfill its duties, the BOE not only researched each out-of-state licensing program but established and maintained list of all approved out-of-state reciprocal jurisdiction per the Trade Equitability Resolution adopted and updated periodically by the BOE. In 2020 during Covid, the Board quit meeting due to restrictions placed by the Health Department for the Town. At that time, the Town Building Department staff took over responsibility for verifying work experience for contractor license applications while the BOE retained its role as a Board of Appeals as required by the Building Code. Without the direct involvement and assistance of the BOE, the out-of-state reciprocity table has not been updated in recent years.

In preparation of the proposed ordinance amendments, the Building Official met with the BOE on July 14, 2026, where the BOE recommended approval of the rescission of the existing Trade Equitability Resolution. This resolution was not adopted by the Council but by the BOE per the authority provided the Building Official in Title 15.36.030.C. The rescission was done because the list is outdated and is no longer maintained by the BOE because reciprocity is now the responsibility of Building staff. In addition, because contractor licensing requirements are frequently changing in other states, even approved jurisdictions can become "unapproved" because states amend their qualifications from time to time. This means staff still would have to invest considerable time to individually re-verify the qualifications of every applicant even if they come from a reciprocal state or jurisdiction on the list.

Finally, the Council should be aware that Town has also been spending increasing time licensing contractors who work on projects only in Teton County because the Town has historically agreed to qualify County-only contractors as a professional courtesy. Staff could find no record of a formal agreement between the Town and County, so it appears to have been a verbal or informal arrangement because the Town contractor licensing ordinance in Title 15.36 applies only to the Town of Jackson. When the licensing program was originally adopted most contractors worked in both the Town and County. Staff find this is not the case any longer with many contractors working only in the County. As a result, and in light of staff's limited capacity and the increase in Teton County-only contractors, the Town Building Department recently decided that it is no longer feasible to provide this service for the County. Town staff met with the County Building Department to inform them of this change and to assist them in transitioning to their own contractor licensing program should they choose to create one of their own (which seems to be the current plan). In terms of reciprocity, any contractor with a license or COQ from the County will be approved for an equivalent Town license or COQ per the state reciprocity rules. The County has informed the Town that it plans to model its program to match closely the Town's program. If so, this will make it much easier and quicker for the Town to conduct its reciprocity review. While this change will require some contractors to get a license in both jurisdictions, because many contractors work only in the County, the impact should be limited.

Analysis & Key Questions.

Overview: Staff's proposed amendments are intended to modernize the Town's contractor licensing program by eliminating our reciprocity requirements for out-of-state contractors and eliminating COQ requirements for Journeymen and Apprentices while maintaining contractor licensing requirements for Master contractors and businesses performing work within the Town of Jackson. This change will save considerable time by relieving staff from the burden of verifying the equivalency of the licensing programs in other states and jurisdiction and instead require only Master contractors from out of the state to take the required ICC (or equivalent) trade test and to show supporting work experience.

Proposed Change #1. Eliminate Reciprocity for All Out-of-State Contractors: This change would remove the Town's current out-of-state contractor licensing reciprocity program and replace with a requirement to pass a relevant trade test and provide supporting work experience. We would continue to keep reciprocity for contractors in jurisdictions within Wyoming per State statute.

The Town's existing contractor licensing ordinance allows reciprocity for contractors from jurisdictions outside the State of Wyoming. Reciprocity was adopted to simplify and expedite the approval process for contractors coming into our area from other jurisdictions. In the beginning of our Contractor Licensing, as explained above, this was done by the BOE because that was the only tool available at the time but it is now done by Building staff. Staff are proposing that in lieu of the current program where staff must verify the "equivalency" of numerous out-of-state contractors programs to determine whether a Town license would be issued on the basis of reciprocity, out-of-state contractors would now simply complete the International Code Council (ICC) testing program and provide necessary work history to confirm their required code knowledge and qualifications for their level of certification (which would be for Master only if Apprentice and Journeyman COQs are removed as requested in proposed change #2).

Staff are proposing these changes based on many factors and trends that have made it increasingly difficult to administer and maintain this program, while maintain life safety welfare benefits of contractor licensing, including:

- Contractor licensing requirements in other states continue to change, requiring significant staff time to research and verify equivalency.

- Applicants frequently provide inaccurate or misleading work histories that are difficult, if not impossible to verify, and then sometimes challenge staff's final determinations, consuming significant additional staff time and energy.
- The Building Department's staffing has remained essentially unchanged for more than 20 years, while contractor licensing activity has increased (2025 there were 169 Contractor Licenses issued. So far this year, July 2026 we have 259 Contractor Licenses issued with 72 missing submittals and over 140 applications that were submitted as duplicates and unqualified applicants that do not meet the minimum standards. During that same time, we have had 497 Certificates of Qualifications that have been submitted for review and 143 of those are still missing submittals for approval). The Town's SmartGov licensing portal now provides a more efficient and consistent process for reviewing contractor qualifications, but each submittal has to be reviewed by someone on staff. During that time there have been 390 working days from 1/1/25 to 7/28/26 with 888 applications having to be reviewed and each application take 1-4 hours depending the quality of the submittal by the Development Coordinator or by the Building Official when someone is on vacation.
- In 2024, the State of Wyoming adopted new reciprocity requirements for contractor licensing that municipalities are now required to follow. In short, it requires any Wyoming jurisdiction that issues contractor licenses to accept as reciprocal any valid contractor license from another Wyoming jurisdiction provided the applicant has passed the relevant ICC test (or equivalent), their license is active and in good standing, and their license requires the same (or equivalent) level of work experience. Thus, while the new statute imposes some new requirements, it does not require the Town to lower our standards to approve reciprocity for contractors from other jurisdictions in Wyoming and therefore has had little substantive impact on our licensing program.

Key Question #1: Does Council support eliminating the Town's current reciprocity program for out-of-state contractors, and replace it with a requirement to pass a relevant trade test and provide supporting work experience?

Proposed Change #2. Certificates of Qualification (COQ): Eliminate the Journeyman and Apprentice Certificate of Qualification requirements.

There are three qualification levels in the Town's COQ program for contractors: 1) Apprentice; 2) Journeyman; and 3) Master. No experience is required to get an Apprentice COQ card but all entry-level trades people are required to obtain and carry an Apprentice COQ card. Four years working as an Apprentice then qualifies one as a Journeyman, and then another four years as a Journeyman qualifies one as a Master for most trades (including required testing). Staff recommend eliminating the Apprentice and Journeyman COQs to help "right-size" staffing capacity with the number of new contractors coming into our area. For context, in 2025 and thus far in 2026, the Town has processed approximately 473 COQs: 145 Apprentice, 79 Journeyman, and 249 Master. For additional context, the Town processed a total of 119 COQs in 2019 which increased to 310 COQs in 2023 (260% increase) and has held roughly steady at about 300+ COQs per year to the present. Thus, eliminating the Apprentice and Journeyman COQs constitute an approximate 47% reduction in the total COQs and staff's workload on COQs. The main time savings will come from not only not needing to individually verify the often complex and inaccurate work histories associated with the COQ applications but also the numerous hours spent answering questions from Apprentice and Journeyman applicants about the program requirements and then assisting them through the COQ application process. However, staff will still need to check the work histories for Master COQ applicants but these are usually easier to verify because Master COQ applications are often more professional and complete.

Although COQs were originally intended to establish and verify the qualifications of individual Journeymen and Apprentices that work in the Town, the Building Department's experience has demonstrated that the greatest public protection is achieved through oversight by the licensed contractor responsible for the work of all trades people working

under them (Apprentices and Journeyman), combined with comprehensive building permit plan review and rigorous field inspections and thus are recommending that these requirements are no longer necessary.

Licensed contractors who hold an approved contractor license will remain responsible for ensuring that all work performed under their supervision complies with the adopted construction codes regardless of who performs the work. The Town's permitting and inspection process provides multiple opportunities to verify code compliance before work is approved, making these activities the primary safeguards for protecting the public.

As mentioned above, maintaining COQs for Apprentices and Journeyman requires significant administrative effort to review applications, research changing licensing standards in other jurisdictions, determine trade equivalency, issue certificates, maintain records, and address ongoing compliance questions. As contractor licensing requirements continue to evolve across surrounding states and municipalities, these determinations have become increasingly difficult and time consuming.

Eliminating COQs for Journeymen and Apprentices will allow staff to redirect limited resources toward services that more directly improve public safety, including timely permit review, inspections, contractor licensing administration, and code enforcement. The proposed amendments also provide a more predictable and consistent licensing process for contractors while reducing unnecessary administrative requirements that do not substantially enhance public safety.

Thus, while some people may be concerned that no longer requiring COQs for Apprentices and Journeyman will result in unqualified people constructing new homes and businesses, staff reiterate that all buildings must meet the same building codes and must pass the same inspections regardless of who builds them. Public safety will continue to be protected through contractor licensing, building permits, plan review, inspections, and code enforcement. These functions provide the primary safeguards that ensure work complies with the adopted construction codes and that contractors remain accountable for the work performed.

Key Question #2: Does the Council support eliminating the current Certificate of Qualification program for Apprentices and Journeyman?

Possible Alternatives.

1. Alternative 1: Council may choose to make none of the requested changes and keep the contractor licensing ordinance unchanged.
2. Alternative 2: Council could choose to make none of the requested changes and approve more staff to support existing levels of service.
3. Alternative 3: Council may modify the two requested changes as it deems appropriate.

Comprehensive Plan & Priority Alignment.

The Comprehensive Plan does not indirectly or directly address or provide any goals related to contractor licensing. However, Chapter 8: Quality Community Service Provision is dedicated to creating a framework of goals and strategies that commit the Town and County governments to providing high-quality public services, noting that “[p]rovision of life-safety, educational, social, cultural, and recreational services is central to residents’ Quality of Life and a visitor’s experience”

More specifically, the proposed amendments align with the following the Comprehensive Plan goals:

- Policy 8.1.a: Maintain current, coordinated plans for delivery of desired service level. Approval of the requested changes will help ensure that the Building Department can continue to provide a high-level of customer service by removing unnecessary obligations and requirements within the contractor licensing program.

- Policy 8.1.c Innovate past barriers to service delivery goals: The requested changes are intended to find a creative solution to better match existing staff capacity with a rapidly changing and growing contractor labor market.

Fiscal Impact.

The removal of the Journeyman and Apprentice COQ requirements will result in the loss of approximately \$10,000 of revenue annually associated with those certifications. Last year's total revenue for all COQ Licensing was \$23,993, so the loss of \$10,000 would reduce revenue by approximately 42% annually.

Staff Impact.

The amount of staff time on this project is approximately 40 hours. In the long-term, the proposed amendments are expected to significantly reduce ongoing administrative workload associated with reviewing Certificates of Qualification and researching licensing equivalency among other jurisdictions. These efficiencies will allow Building Department staff to devote additional time to permitting, plan review, inspections, code enforcement, and customer service without requiring additional staffing resources.

Attachments or Links.

Redline Title 15.36 Contractor Licensing and Certification

Suggested Motion.

I move to approve the proposed amendments to Title 15.36 - Contractor Licensing and Certification as presented in this staff report dated August 3, 2026, and to direct staff to prepare an ordinance for first reading.

ORDINANCE F

AN ORDINANCE AMENDING CHAPTER 15.36, CONTRACTOR LICENSING, OF TITLE 15, BUILDINGS AND CONSTRUCTION, OF THE TOWN OF JACKSON MUNICIPAL CODE.

BE IT ORDAINED BY THE TOWN COUNCIL OF THE TOWN OF JACKSON, WYOMING:

SECTION I.

Section 15.36.020, Definitions, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.020 Definitions.

As used in this title:

~~Apprentice means an individual who is learning a trade under the direct Supervision of a person qualified under the terms of this chapter to train an individual in that trade.~~

Certificate of Qualification . . .

Contractor . . .

~~Journeyman means an individual who, through proven experience and demonstrated knowledge, shows proficiency in their trade. Such an individual shall be qualified to work for a Licensed Contractor without direct Supervision.~~

License . . .

Master . . .

Principal Place of Residence . . .

Supervision means the continuous control of all work in progress as authorized by the ~~Journeyman or~~ Master.

(Ord. ____ § I, 2026; Ord. 1380 § I, 2024).

SECTION II.

Section 15.36.031, License and certification required, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.031 License and certification required.

- A. It shall be unlawful for any person to undertake any of the types of work regulated by this Chapter within the Town without first obtaining ~~a~~any required License and/or Certificate of Qualification; in compliance~~ing~~ with the provisions of this Chapter.
- B. . . .

C. ...

(Ord. ____ § II, 2026; Ord. 1380 § I, 2024).

SECTION III.

Section 15.36.035, Applications—Initial and renewal, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.035 Applications—Initial and renewal.

A. ...

B. ...

C. ...

D. ...

E. Applications, whether for a License or a Certificate of Qualification, shall be processed within 30 days of the receipt of a ~~_complete~~ application.

F. ...

G. Renewal of a Certificate of Qualification requires the applicant to either have i) completed ~~six eight~~ hours of educational seminar covering the adopted code for the applicable trade approved by the Building Official, or their designee, or ii) ~~provided a passed to~~ re-test through the ~~most current~~ ICC Trade Certification Program, ~~within 60 days of the renewal date~~.

(Ord. ____ § III, 2026; Ord. No. 1446, § I, 2025; Ord. 1380 § I, 2024).

SECTION IV.

Section 15.36.050, Certificates of Qualification, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.050 Certificates of Qualification.

A. ...

B. ...

C. *Reciprocity.*

1. ...

2. *Reciprocity with jurisdictions outside of Wyoming. ~~Reciprocity may be granted pursuant to 15.36.030. The Town of Jackson will not extend reciprocity to Licenses and Certificates granted by jurisdictions outside Wyoming.~~*

D. ...

E. *Classifications*. There shall be the following only classes of certification is a and the holder shall be authorized to do the following: 1. ~~Masters~~ Certificate of Qualification. A This Certificate of Qualification shall be required and shall permit the holder thereof to be supervisor or Master for each of the trades in which they have been certified.

2. ~~Journeyman Certificate of Qualification~~. A Certificate of Qualification shall be required in the trades described in this chapter and shall entitle the individual to work only in the trade for which they are certified and classified. Such certificates shall permit the individual to work only under the authority of a certified Master or supervisor.

3. ~~Apprentice Certificate of Qualification~~. A Certificate of Qualification shall serve as a registration with the Town. Such certificate shall entitle the Apprentice to work under the direct Supervision of a Journeyman or Master within each respective classification. With the exception of general, building, and residential Contractors, no individual Journeyman or Master shall have more than four Apprentices under their direct Supervision.

F. *Classifications Type of certifications—experience required*. An application shall may be filed in accordance with the time periods listed below unless otherwise approved by the Building Official or their designee. A person may not apply to upgrade their certificate to the next higher classification until they have met the experience requirement or equivalent, as approved by the Building Official or their designee. Up to 50 percent credit may be given toward the experience period set forth below at the discretion of the Building Official, or their designee, for relevant equivalent education in the construction field. The applicant is responsible for providing proof to verify such experience. Applicants that are unable to provide adequate and appropriate experience or time in service will be issued the next lower classification regardless of the exam they passed.

1. ...

2. ...

3. ...

4. ...

5. *Plumbing Certification*. Master applicants shall have eight years' experience, four of which are in a supervisory position. Apprentices shall be able to verify four years of working actively in a training program or for a qualified plumbing Contractor prior to applying to advance to the Journeyman level. Journeyman shall be able to verify four years of working actively in a training program or for a qualified plumbing Contractor prior to applying to advance to the Master level.

6. *HVAC Certification*. Master applicants shall have eight years' experience, four of which are in a supervisory position. Apprentices shall be able to verify four years of working actively in a training program or for a qualified HVAC Contractor as an Apprentice prior to applying to advance to the Journeyman level. Journeyman shall be able to verify four years of working actively in a training program or for a qualified HVAC Contractor as a Journeyman prior to applying to advance to the Master level.

7. ...

8. ...

9. ...

10. ...

(Ord. ____ § IV, 2026; Ord. 1380 § I, 2024).

SECTION V.

Section 15.36.060, Exemptions, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.060 Exemptions.

A. . . .

1. . . .

2. . . .

3. . . .

4. . . .

~~5. *Individuals Under the Age of 18 Years Old.* Beginning on January 1, 2026, individuals under the age of 18 years old may work in the trades regulated by this Chapter without a Certificate of Qualification. Individuals must apply for and obtain the appropriate Certificate of Qualification card upon turning 18 years old and, after verification of work history, may be given up to 100 percent credit for the hours worked after January 1, 2026 while under the age of 18 years old.~~

(Ord. ____ § V, 2026; Ord. No. 1446, § IV, 10-20-2025).

SECTION VI

All ordinances and parts of ordinances in conflict with the provisions of this Ordinance are hereby repealed.

SECTION VII

If any section, subsection, sentence, clause, phrase, or portion of this ordinance is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such portion shall be deemed as a separate, distinct and independent provision and such holding shall not affect the validity of the remaining portions of the Ordinance.

SECTION VIII

The penalty for violating any provision of this Ordinance is up to a maximum of \$750.00 per day per violation.

SECTION IX

This Ordinance shall become effective upon its passage, approval, and publication.

PASSED 1ST READING THE _____ DAY OF _____ 2026.

PASSED 2ND READING THE _____ DAY OF _____ 2026.

PASSED AND APPROVED THE _____ DAY OF _____ 2026.

TOWN OF JACKSON

Arne O. Jorgensen, Mayor

ATTEST:

_____, Town Clerk

ATTESTATION OF TOWN CLERK

STATE OF WYOMING)

) ss.

COUNTY OF TETON)

I hereby certify that the foregoing Ordinance ____ was duly published in the Jackson Hole News and Guide, a newspaper of general circulation published in the Town of Jackson, Wyoming, on the ____ day of _____ 2026. I further certify that the foregoing Ordinance was duly recorded on page ____ of Book ____ of Ordinances of the Town of Jackson, Wyoming.

_____, Town Clerk

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Planning	Presenter:	Katelyn Page
Agenda Item:	Conditional Use Permit for Outfitter/Tour Operator use at 250 North Cache Street (P25-163)	Public Comment	Yes

Purpose or Policy Considerations.

The purpose of this item is for the Council to review a request for a Conditional Use Permit (CUP) for the applicant, Brian McCooey representing Yellowstone Day Tours, a wildlife tour company, in the Downtown Core-1 (DC-1) zoning district at 250 North Cache Street. A CUP is required to operate an Outfitter/Tour Operator use in the DC-1 zoning district.

Recommendation.

The Planning and Building Director and Planning Commission recommend **approval** of a CUP for Outfitter/Tour Operator use at 250 North Cache Street, subject to the departmental reviews attached hereto and the following three (3) conditions:

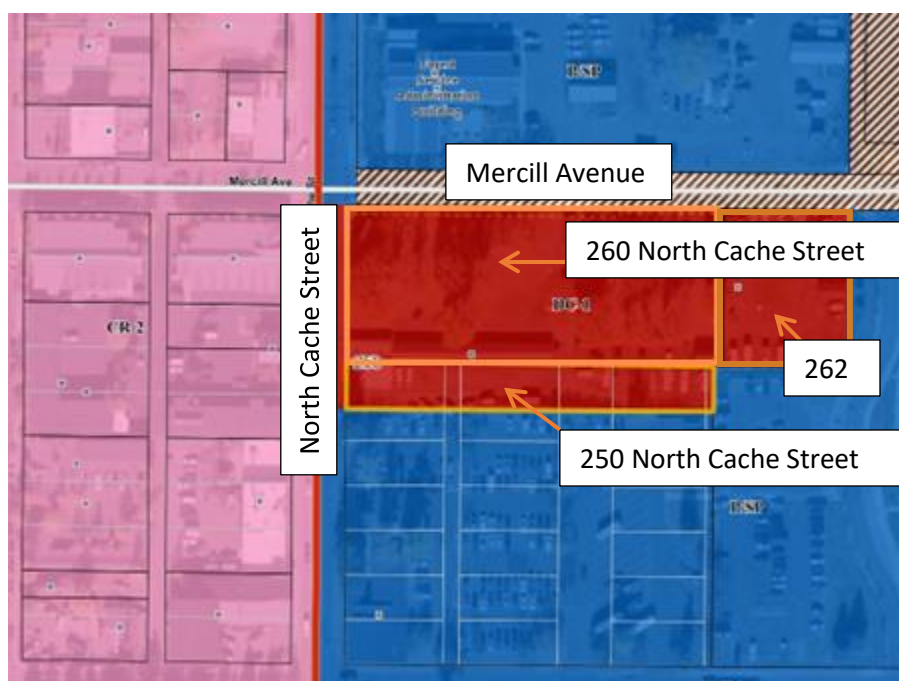
1. Prior to issuance of the CUP, the applicant shall remove or replace the five existing nonconforming exterior lighting fixtures immediately adjacent to the office structure on the property addressed as 250 North Cache Street to meet standards of LDR Sec. 5.3.1 (Exterior Lighting).
2. Parking and exchange of all vehicles associated with the Outfitter/Tour Operator use – including the commercial fleet and employee vehicles – shall occur on 250 North Cache Street directly east of the structure as indicated on the approved site plan. At no time shall vehicles associated with the Outfitter/Tour Operator use park on the property at 260 or 262 North Cache Street.
3. Prior to issuance of the CUP, the applicant shall install signage for a minimum of six vehicle parking spaces, consistent with the approved site plan, that indicate the vehicle parking spaces are reserved for use by the Outfitter/Tour Operator use.

Background.

Project Location

Yellowstone Day Tours is proposing operating a wildlife tour company from an 832-square-foot office structure at 250 North Cache Street, located in the Downtown Core-1 zone. The property is part of the Kudar Motel campus, which also includes 260 and 262 North Cache Street. The office structure has historically been used for outfitter and tour guide functions, though the Town has no record of previously approved use permits for that purpose. The property at 250 North Cache Street is legally described as LOTS 7-8, BLK. 2 and LOT 7, BLK. 3, SMITH Addition to the Town of Jackson. An aerial and zoning map of the properties is shown in Figure 1:

Figure 1
Aerial and Zoning Map



Public noticing for this item included two addresses – 250 and 260 North Cache Street – based on the applicant’s original proposal for a wildlife tour service within the structure located at 250 North Cache Street and vehicle parking on 260 North Cache Street. Consistent with staff recommendation and department reviews detailed below, an updated site plan submitted by the applicant on May 15, 2026, provides vehicle parking for the use entirely on 250 North Cache Street. Thus, because both floor area and vehicle parking for the proposed use are consolidated onto one property, staff use the address of 250 North Cache Street for the proposed use in the below description and analysis.

Existing Conditions

The Property, owned by KUDAR ENTERPRISES, INC., is a 0.47-acre parcel located in the DC-1 zone. It is part of the larger “Kudar Motel” campus (that also includes 260 & 262 North Cache Street) that includes a motel, motel office, cabins, lawn, and vehicle parking and circulation. Properties are zoned Commercial Residential-1 (CR-2) to the west, Public/Semi-Public (P/SP) to the south and east, and DC-1 to the north.

The Property takes access from North Cache Street and has an internal drive aisle connection to 260 and 262 North Cache Street to the north. The Property includes an office structure of approximately 832 sf that is physically connected to the motel at 260 North Cache Street. The structure has historically been used for outfitter/tour guide functions though the Town has no record of previously approved use permits. The Property includes undefined vehicle parking and circulation comprised of both pavement and gravel.

In May 2026, Town staff conducted a pre-application meeting (P26-094) for the potential redevelopment of the Kudar Motel campus into a mixed-use lodging, commercial, and residential project. However, the timeline for that redevelopment remains uncertain. If the project moves forward, the wildlife tour company that is the subject of this CUP will likely be displaced from the Kudar Motel campus. Staff considered this possibility during its review of the CUP and determined it is not a basis for denial, the CUP authorizes a use that is appropriate for the zone today, and any future redevelopment would go through its own approval process.

Proposed Use

The applicant, Brian McCooey representing Yellowstone Day Tour (“YDT”), is seeking a CUP for 832 sf Outfitter/Tour Operator use. The administrative office for the use is located entirely at 250 North Cache Street. Per the applicant, the Property will be used for YDT’s base of operations, meaning the location to store and maintain tour vehicles and conduct administrative needs (ex: reservation booking). It will also serve as a gathering point for YDT guides to meet and exchange their personal vehicles for company-owned tour vans before heading out to pick up clients at their places of lodging or other meeting points. According to the applicant, no tour customers will drive to the Property.

YDT employs an average of seven full-time employees. Of that total, one employee is typically onsite at any given time to fulfill administrative needs. Off-season and winter operations are limited to one administrative staff infrequently onsite at the Property. Operational impact fluctuates based on seasonal demand and is outlined in Table 1 below.

Table 1
Summary of Seasonal Operations

Season	Operational Hours	Full Time Employees (approx.)
Summer: May-September	5:45am-6:00am departure (Peak AM) 12:00pm-3:00pm (one tour exchange) 7:00pm-8:30pm return (Peak PM)	7-10
Shoulder Season/Winter: October-April	Office only activity	2

Analysis & Key Questions.

The purpose of a CUP is to individually and publicly review the configuration, density, and intensity of a use that is generally compatible with the character of a zone, but requires additional, site-specific conditions to limit and mitigate effects that may be adverse to the desired character of the zone. Staff find that, as conditioned, the proposed use meets the necessary findings of approval to approve a CUP in the DC-1 zone.

Three issues required specific analysis: exterior lighting compliance, vehicle parking and access, and affordable housing mitigation. Each is addressed below.

Nonconforming Physical Development and Exterior Lighting

The Property has existing nonconformities including, but not limited to, building setbacks, form, and minimum height, street façade design, exterior lighting, and parking and loading design. However, because the proposed use does not constitute an increase of floor area, site area, or intensity of use, compliance with existing nonconforming physical development is not required and may continue as allowed by LDR Sec. 1.9.2 (Nonconforming Physical Development). This means that the existing nonconforming conditions, with the exception of exterior lighting, are not required to be addressed at this time.

A total of five exterior light fixtures on the office building at 250 North Cache Street must be removed or updated to comply with the dark sky standards in LDR Sec. 1.9.6.F (Nonconforming Lighting – Other Permits), which requires nonconforming exterior lighting to be brought into compliance as part of a CUP. Staff have included a recommended condition of approval (Condition #1) requiring these upgrades. The department review comments identify the specific exterior light fixtures that must be removed or modified.

Vehicular Access and Parking

The applicant proposes a fleet-based independent calculation of six vehicles for their parking requirement at the property based on the number of vehicles associated with their business. This approach is commonly used for CUP applications

involving tour operators; however, parking demand based on fleet size can vary significantly depending on the operational needs of a specific business. Staff have previously supported this practical, operations-based approach in lieu of a theoretical parking calculation, typically with a condition of approval requiring that all parking, staging, and vehicle exchanges associated with the tour operator occur on the subject property and not impact neighboring properties or the public right-of-way (ROW). Under this approach, no minimum parking requirement would be imposed so long as vehicle-related impacts remain contained to the Property.

Staff support this practical approach and recommend a condition of approval (Condition #2) that parking and exchange of all vehicles associated with the Outfitter/Tour Operator use – including the commercial and employee vehicles – shall occur on 250 North Cache Street directly east of the office structure as indicated on the site plan dated May 15, 2026. Additionally, at no time shall vehicles associated with the tour operator park on the property at 260 North Cache Street or 262 North Cache Street.

To clearly identify the vehicle parking area east of the structure that will be dedicated to YTD use on the Property, staff recommend another condition of approval (Condition #3) that the applicant install signage for a minimum of six vehicle parking spaces, consistent with the approved site plan, that indicate vehicle parking spaces are reserved for use by YTD.

Lastly, the public ROW along the North Cache Street frontage adjacent to 250 and 260 North Cache Street includes existing red curb markings prohibiting stopping, standing, or parking at any time consistent with municipal Code 10.04.39.2.A (Signage and Curb Markings). This means that additional measures to mitigate vehicle activity generated by the proposed use along the North Cache Street public ROW are not needed at this time.

Affordable Workforce Housing Mitigation

The proposed use is exempt from required affordable workforce housing mitigation per LDR Sec. 6.3.2.C.7 (Nonresidential Changes of Use).

Public Comment.

Staff did not receive public comment as of the date of this staff report.

Findings.

Pursuant to Section 8.4.2.C (Findings for Approval) of the LDRs, a CUP shall be approved if the following findings can be met.

1. *Consistency. The proposed Conditional Use is consistent with the purposes and organization of the LDRs.*

Complies. Staff find that the proposed use is consistent with the purposes and organization of the LDRs and, as conditioned, is generally compatible with the desired character of the DC-1 zone.

2. *Use Standards. The proposed Conditional Use complies with the use-specific standards of Division 6.1.*

Complies. Staff find that the proposed use complies with the standards of Division 6.1. The proposed use is an allowed use within the DC-1 zone with the approval of a CUP, does not require updates to the existing off-street vehicle parking and loading areas as allowed under LDR Sec. 1.9.2 (Nonconforming Physical Development), does not require new vehicle or bicycle parking per LDR Sec. 6.2.2. (Required Parking and Loading), and is exempt from affordable workforce housing mitigation per LDR Sec. 6.3.2.C.7 (Nonresidential Changes of Use).

3. *The proposed Conditional Use minimizes adverse visual impacts.*

Complies as conditioned. Staff find that, as conditioned, the proposed use minimizes adverse visual impacts. As conditioned, all vehicles associated with the proposed use – including commercial and employee vehicles – must be parked directly east of the office structure to screen vehicles to the greatest extent possible from North Cache Street. Posted signage shall be installed indicating the location of vehicle parking consistent with the approved site plan. Lastly, the applicant shall replace existing nonconforming exterior lighting on the Property to meet standards of LDR Sec. 5.3.1 (Exterior Lighting Standards).

4. *The proposed Conditional Use minimizes adverse environmental impacts.*

Complies. The Property is not located within the Natural Resource or Scenic Resource Overlays and no other environmental impacts generated by the proposed use have been identified by staff.

5. *The proposed Conditional Use minimizes adverse impacts from nuisances.*

Complies. Staff have not identified any adverse impacts from nuisances that are created from the proposed use.

6. *Impact on Public Facilities. The proposed Conditional Use shall not have a significant adverse impact on public facilities and services, including transportation, potable water and wastewater facilities, parks, schools, police, fire, and EMT facilities.*

7. **Complies.** Staff find that the proposed use does not have a significant adverse impact on public facilities and services, including transportation, potable water and wastewater facilities, parks, schools, police, fire, and EMT facilities. No additional public impacts have been identified.

8. *Other Relevant Standards/LDRs. The development and operation of the proposed Conditional Use shall comply with all standards imposed on it by all other applicable provisions of the LDRs and all other Town Ordinances.*

Complies as conditioned. Staff find, as conditioned, that the proposed use complies with the provisions of the LDRs and with all other Town Ordinances. As conditioned, the applicant shall replace existing nonconforming exterior lighting on the Property to meet standards of LDR Sec. 5.3.1 (Exterior Lighting Standards).

9. *Previous Approvals. The proposed Conditional Use shall be in substantial conformance with all standards or conditions of any prior applicable permits or approvals.*

Complies. Staff find there are no prior applicable permits or approvals with which the proposed use must comply.

Planning Commission.

The Planning Commission reviewed CUP P25-163 on July 1, 2026, and voted 4-0 to recommend that the Town Council approve the CUP subject to the staff-recommended conditions. During the meeting, the Planning Commission expressed no significant questions or concerns regarding the application.

Key Question: Does Council find that the three conditions of approval adequately address the site-specific concerns identified through the review process, specifically exterior lighting compliance, vehicle parking containment, and parking signage, and support approving CUP P25-163 as conditioned?

Staff recommends yes. The three conditions are targeted, enforceable, and consistent with how staff has conditioned similar tour operator CUPs.

Possible Alternatives.

Alternative 1: Council may consider requiring a paved surface for the existing gravel parking area. Staff does not recommend this condition at this time, the existing gravel area is functional for the proposed use, the site may be subject to redevelopment in the near future, and requiring a capital improvement to a surface that may be demolished would impose a disproportionate cost on the applicant.

Alternative 2: Council may deny the request if it is unable to meet the necessary findings for approval for a CUP required by LDR Sec. 8.4.3.C (CUP Findings for Approval). Staff does not recommend denial, all required findings can be made as conditioned, the use is appropriate for the DC-1 zone, and the Planning Commission voted 4-0 to recommend approval with no significant concerns.

Comprehensive Plan & Priority Alignment.

The Property is located in Subarea 2.3 (Downtown) of the Jackson/Teton County Comprehensive Plan. This is a transitional subarea intended to be a center of civic, cultural, economic and social activity for the community and the center for visitor experience. Tourism serving businesses such as wildlife tour companies are expected and supported in this subarea.

Approving this CUP is consistent with the Comprehensive Plan's vision for the Downtown subarea as a place where visitor-serving commercial uses are encouraged and supported. Staff does not identify tension between this approval and other Comprehensive Plan goals.

Fiscal Impact.

There is no fiscal impact identified.

Staff Impact.

Staff spent approximately 26 hours reviewing the CUP application, including research, report preparation, and presentation. An additional 13 hours were required to support the applicant through the permitting process and in achieving a sufficient application with all materials necessary for staff review.

Attachments or Links.

Department Reviews

Updated Site Plan 05.15.2026

Applicant Submittal

Suggested Motion.

I move to **approve** Conditional Use Permit P25-163 for an Outfitter/Tour Operator use at the property addressed 250 North Cache Street based upon the findings and conditions presented in the staff report, the departmental reviews, and subject to this staff report dated August 3, 2026.



PERMIT NOTES

Page 1 of 3

Report Run On: Wednesday, 29 April
2026 16:18

Permit # P25-163
Site Address: 250 N CACHE STREET
Project Name: Conditional Use Permit - Yellowstone Day Tours

Parcel # : 22-41-16-27-3-03-001

Note Type	Note Code	Text	Created By	Begin Date	End Date
CONDITIONS		See the document attached.	IJIMENEZ@JAC KSONWY.GOV	04/29/26	4/29/26



PERMIT NOTES

Note Type	Note Code	Text	Created By	Begin Date	End Date
GENERAL		Revisions Required Prior to Planning Commission Review 1. Prior to Planning Commission review, applicant shall provide Town staff a revised site plan ("Drawing No. 1" produced by Nelson Eng. dated 03.10.26) that accurately represents existing conditions at the property, specifically for the area immediate due east of the "office". For example, that sheet shows a wooden deck east of the "office" (non exists) and ground surface east of "office" is currently gravel surface between drive aisle and "Motel" structure shown on that site plan. Revise for accuracy. 2. Prior to Planning Commission review, applicant shall revise site plan ("Drawing No. 1" produced by Nelson Eng. dated 03.10.26) to show parking for the Outfitter / Tour Op. use provided behind (due east) of the structure at 250 N Cache Street and due south of the motel structure on 260 N Cache. Vehicle parking space dimensions, either angled or 90deg, shall meet dimensional standards of LDR Sec. 6.2.5.D (Parking Facility Dimensions). General Staff Review Comments 1. Proposed change of use 832sf Outfitter/Tour Operator Use 2. Parking - Fleet based independent calc. (6 vehicles) 3. Housing Mitigation exempt for nonresidential changes of use per LDR Sec. 6.3.2.C . 4. Property contains nonconforming physical development and is subject to LDR Sec. 1.9.2 (Nonconforming physical development). However, staff find the proposed use does not represent a cumulative expansion of the total floor area, site area, or use at the property. As such, compliance with all applicable LDR standards (per LDR Sec. 1.9.2) is not required. This allows for continued use of existing gravel drive and parking surfaces at 250 N Cache. 5. Property contains nonconforming lighting and is subject to LDR Sec. 1.9.6. (Nonconforming lighting). Prior to issuance of CUP, applicant shall address nonconforming lighting immediately associated with access to the Outfitter/Tour Operator use (flood lights on 250 N Cache). However, staff does not support addressing the nonconforming exposed neon lighting as it not isolated to the property of the proposed use and is associated with the broader motel complex which remains a separate and active use. Staff will work with applicant to identify which nonconforming lighting shall be brought into compliance per LDR Sec. 1.9.6.F. Staff has identified a total of 6 exterior light fixtures to be addressed.	KPAGE@JACKS ONWY.GOV	04/29/26	4/29/26
CONDITIONS		This location must adhere to the applicable life safety standards, which include the provision of portable fire extinguishers.	LPOTZ@JACKS ONWY.GOV	04/14/26	4/14/26



PERMIT NOTES

Note Type	Note Code	Text	Created By	Begin Date	End Date
CONDITIONS		If applicant is going to any remodel of the existing structure, a licensed architect will be required for submittal of the plans, A Class B contractor will be required to do the work.	KSLUDER@JAC KSONWY.GOV	03/23/26	3/23/26
GENERAL	GENERAL COMMENTS	General Comments - Transportation Staff understanding from the application is that they are impacting neither North Cache Street nor the Home Ranch Lot. In general, traffic counts along Cache Street and North 89 suggest busier times are from 11:00 3 pm throughout the summer months. The application suggests YDT only operates day long tours, but if half day tours are an option, they may be impacting N Cache during those times. Based on staff understanding that 1) the operator picks up all customers at their lodging, 2) the Usage hours are accurate (early morning and late evening in the final bullet under Usage, and 3) all tour van parking is provided on-site at 250 & 260 North Cache, on private property, Transportation Dept. has no further comments.	KPAGE@JACKS ONWY.GOV	03/20/26	3/20/26
DEFICIENCY		Need: 1. LOA 2. Permit fee 3. Findings 4. LDR compliance summery	KPAGE@JACKS ONWY.GOV	09/16/25	9/16/25

CONDITIONAL USE PERMIT– APPROVED w CONDITIONS

P25-163

ADDRESS: 250 North Cache Street

OWNER: Kudar Enterprises, Inc.

APPLICANT: Yellowstone Day Tours

4/28/2026

Ismael Jimenez, 733-3079

DATE OF SUBMITTAL: 9/4/2025

DATE OF MATERIALS: 3/9/2026

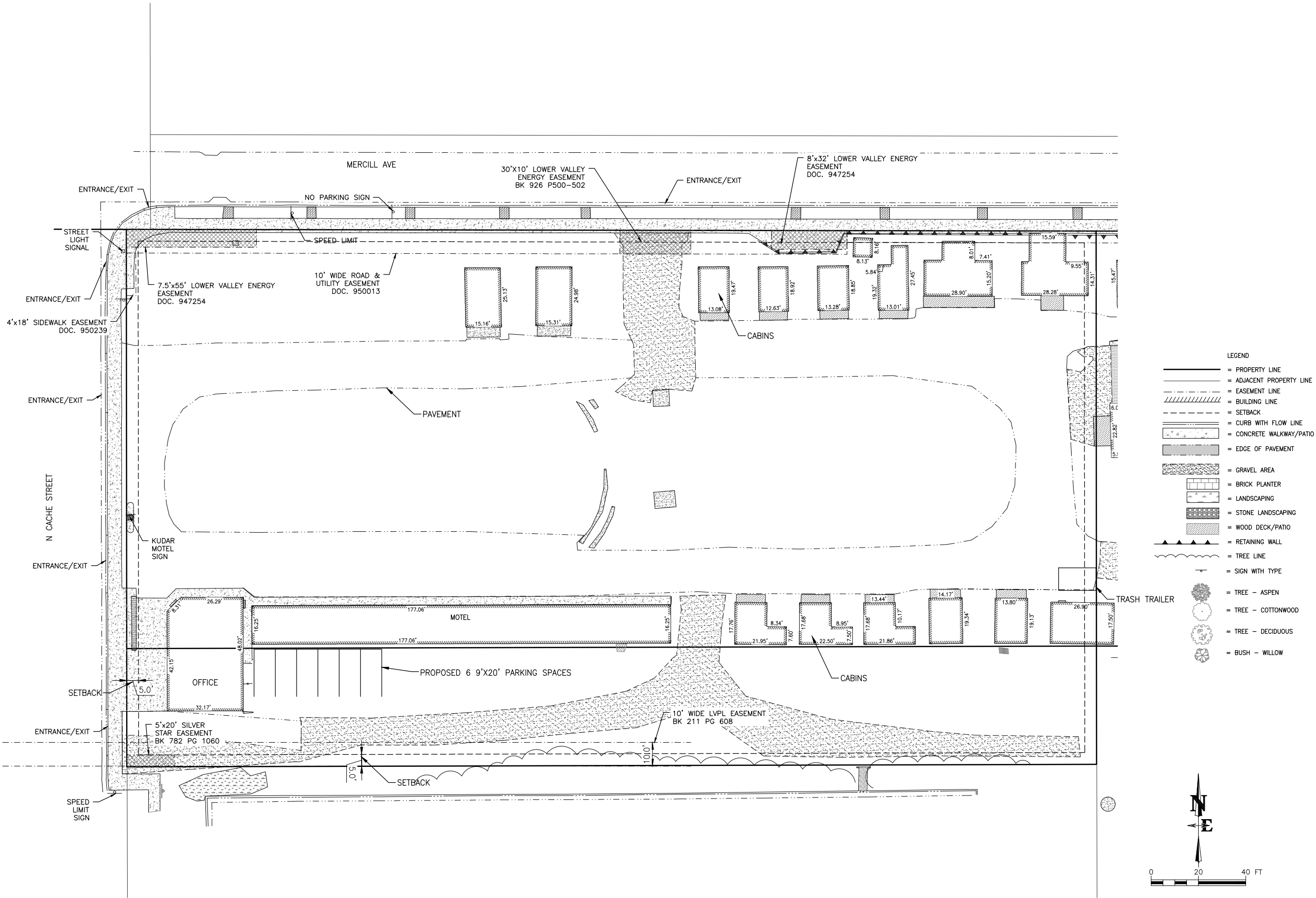
REVISION NO.: 00

The engineering division has reviewed your application for a **USE PERMIT** submitted on and with application materials as dated above.

NOTES FOR APPROVAL

1. Staging and operations shall not occur within or interfere with use of the right-of-way.

LAYOUT SITE MAP-2604 - - PRINTER/PLOT3 DWG To PDF ac3 - - PAGE SETUP 1x17 PDF BW - - PLOTTER BY: Angie Rudolph
DWG NAME: S:\Proj\2604\001-03 C250 N Cache-Kudar Property Site Plan\Survey\Site Map.dwg - - DATE/TIME: 5/15/2026 10:27:12 AM



DRAWING NO	JOB TITLE		DRAWING TITLE		DATE		REV.	
	1		SITE PLAN		3/10/2026			
JOB NO	26-001-03		250 N CACHE STREET 260 N CACHE STREET JACKSON, WY		SURVEYED		ENGINEERED	
					DRAWN		AR	
					CHECKED		LR	
					APPROVED		LR	

**NELSON
ENGINEERING**
P.O. BOX 1599, JACKSON WYOMING (307) 733-2087

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

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

APPLICABILITY. This application should be used when applying for an application required by the Town of Jackson Land Development Regulations.

For additional information, visit <https://www.jacksonwy.gov/200/Planning> and select the applicable permit type

All applications and submittal materials shall be sent to planning@jacksonwy.gov. Paper applications are NOT accepted, and partial or incomplete applications will be returned to the applicant.

PROJECT

Name/Description:

Yellowstone Day Tours Office

Physical Address:

250 + 260 N. Cache St, Jackson WY 83001

Lot, Subdivision:

Lots 7-8, Bk 2, ~~Section~~

PIDN: 22-41-16-27-3-03-001 + 22-41-16-27-3-00-001

PROPERTY OWNER

Name:

Michael Kudar

Phone:

307-413-0850

Mailing Address:

PO Box 1785, Jackson, WY 83001

Email:

Kudar@Kudarmotel.com

APPLICANT/AUTHORIZED REPRESENTATIVE

Name, Agency:

Brian McCooly

Phone:

307-690-0541

Mailing Address:

PO Box 571, Jackson, WY 83001

Email:

brian@yellowstonedaytours.com

DESIGNATED PRIMARY CONTACT☐

Property Owner

☒

Applicant/Authorized Representative

TYPE OF APPLICATION. Check all that apply; details for each type of application are at <https://www.jacksonwy.gov/200/Planning>

Use Permit☐

Basic Use

☒

Conditional Use

☐

Special Use

Physical Development☐

Sketch Plan

☐

Development Plan

Interpretations☐

Formal Interpretation

☐

Zoning Compliance Verification

Other:

Relief from the LDRs☐

Administrative Adjustment

☐

Variance

☐

Beneficial Use Determination

Subdivision/Development Option☐

Subdivision Plat

☐

Boundary Adjustment

☐

Development Option Plan

Amendments to the LDRs☐

LDR Text Amendment

☐

Map Amendment

Signs, Design Review, and Pre-Application conferences have separate applications found on their respective webpage

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. Submit via email to planning@jacksonwy.gov.

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 at <https://www.jacksonwy.gov/DocumentCenter/View/115/Letter-of-Authorization-PDF?bidId=>

Narrative Project Description. Attach a narrative description of the project.

Additional submittal requirements are at <https://www.jacksonwy.gov/200/Planning> under the relevant application type.

Pre-Submittal Steps (if required). Submit all required pre-submittal steps with application.

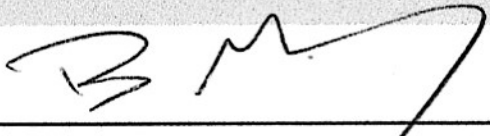
Pre-Application Conference #: P 25-97

Note: Information provided by the applicant or other review agencies during the planning process may identify additional requirements which were not evident at the time of application submittal. Staff may request additional materials during review as needed to determine compliance with the LDRs.

Application Fee. The Town of Jackson Planning Department will contact you for payment once the application has been processed. Current fees can be found at <https://www.jacksonwy.gov/690/Fee-Schedule>

Applications received after 3:00 PM will be processed the next business day

Under penalty of perjury, I hereby certify that I have read this application 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.



Signature
BRIAN MCCOOL

Name Printed

3/9/26

Date
Owner

Title



Town of Jackson
150 E Pearl Avenue
PO Box 1687, Jackson, WY 83001
P: (307)733-3932 F: (307)739-0919
www.jacksonwy.gov

Date:

LETTER OF AUTHORIZATION
NAMING APPLICANT AS OWNER'S AGENT

PRINT full name of property owner as listed on the deed when it is an individual OR print full name and title of President or Principal Officer when the owner listed on the deed is a corporation or an entity other than an individual

Being duly sworn, deposes and says that Michael Kudar is the owner in fee of the premises located at:

Address of Premises: 250 + 260 N. Cache St Jackson WY 83001

Legal Description: MOTEL

Please attach additional sheet for additional addresses and legal descriptions

And, that the person named as follows: Name of Applicant/agent: Brian McCooey

Mailing address of Applicant/agent: PO Box 571

Email address of Applicant/agent: brian@yellowstone day tours.com

Phone Number of Applicant/agent: 307-690-0541

Is authorized to act as property owner's agent and be the applicant for the application(s) checked below for a permit to perform the work specified is this(these) application(s) at the premises listed above:

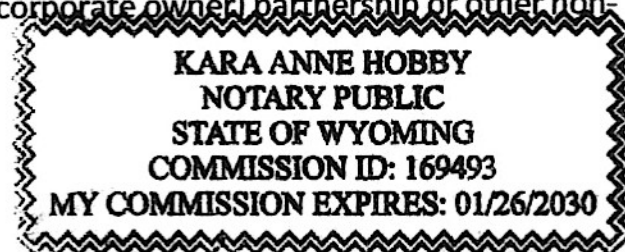
- ☐ Development/Subdivision Plat Permit Application ☐ Building Permit Application
☐ Public Right of Way Permit ☐ Grading and Erosion Control Permit ☐ Business License Application
☐ Demolition Permit ☒ Other (describe) Conditional Use Permit

Under penalty of perjury, the undersigned swears that the foregoing is true and, if signing on behalf of a corporation, partnership, limited liability company or other entity, the undersigned swears that this authorization is given with the appropriate approval of such entity, if required.

[Signature]
Property Owner Signature

Title if signed by officer, partner or member of corporation, LLC (secretary or corporate owner) partnership or other non-individual Owner

STATE OF Wyoming)
COUNTY OF Teton) SS.



The foregoing instrument was acknowledged before me by Michael Kudar this 11th day of March. WITNESS my hand and official seal.

[Signature]
Notary Public

My commission expires: 1-26-30

CUP for Yellowstone Day Tours Office
250 & 260 N Cache St
Jackson, WY 83001

Purpose

Yellowstone Day Tours, a Tour Operator, wishes to occupy an office space and 6 parking spaces at 250 & 260 N. Cache St to manage their operations..

Usage

- YDT operates 6 vans with tour guides
- 1 office staff works approx 2 hours per day onsite
- Most vans depart at 6:00am and return after 7:00pm. 1 van will return around noon and 1 will leave around 3:00pm. Thus, we have very little impact on to N. Cache St. during busy times.
- Guides park in the spot where their Tour van is, thus no extra spaces are used
- Customers do Not come to the office to book tours, they book online or over the phone.
- Customers are picked up at their lodging property, NOT at our office.
- Essentially, the only active times are from 5:45am-6:00am when guides pick up their vans and 7:00pm-8:30pm when guides return

Office

- 832 square foot office with a storage room and bathroom. No exterior storage space.

Parking

- We plan to use six 9'x20' parking spaces on the property, parked on asphalt.

Trash

Trash is put in a Dump Trailer on site that Michael Kudar takes to dump weekly

Findings for Approval

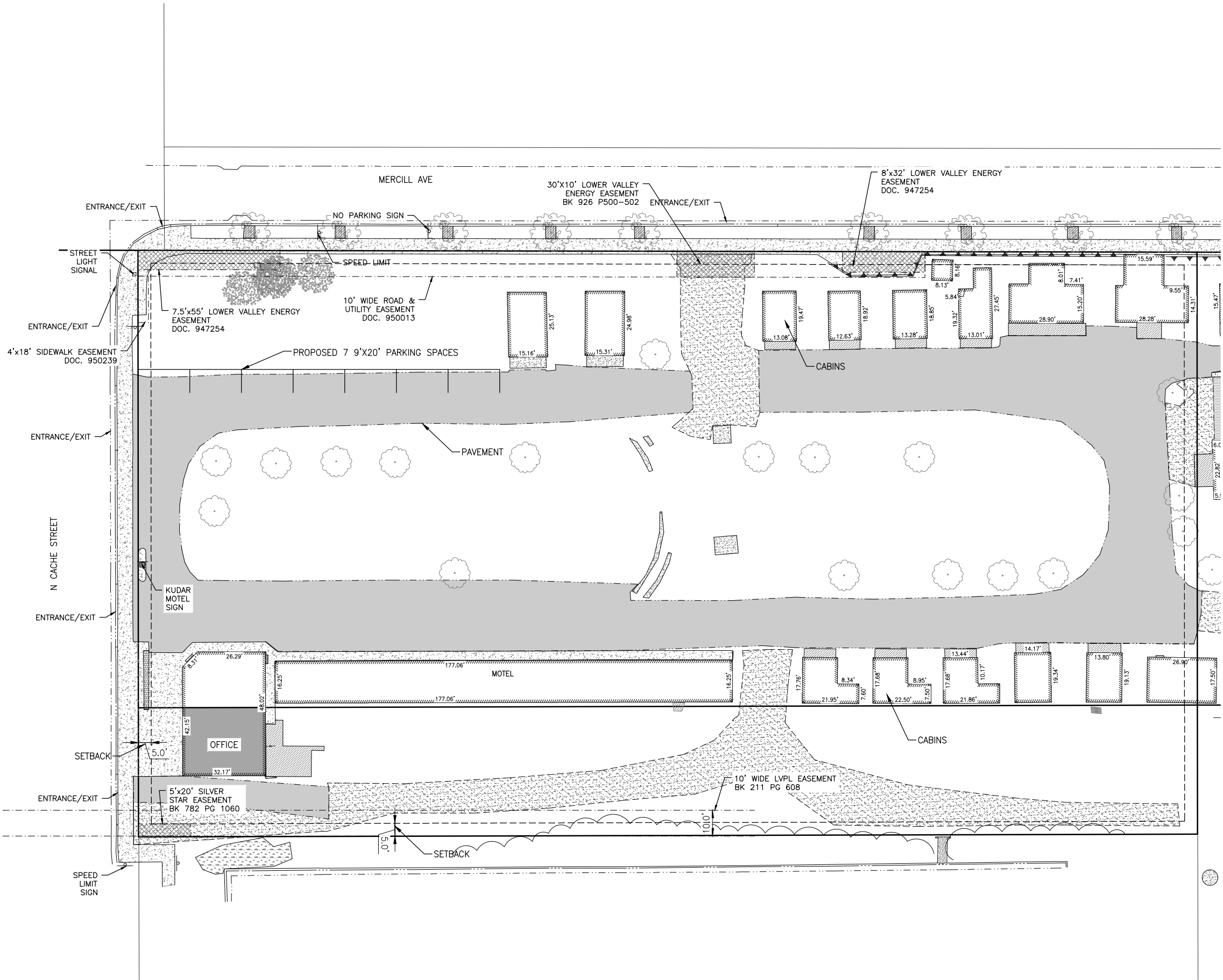
The proposed use:

- Is consistent with the purposes and organization of the LDRs
- Complies with the use specific standards of Division 6.1
- Minimizes adverse visual impacts - no changes to the property and vehicles are plain white
- Minimizes adverse environmental impacts - no changes to the environment
- Minimizes adverse impacts from nuisances - vehicles warm up for a few minutes, then depart
- Minimizes adverse impacts on public facilities - none that we are aware of
- Complies with all other relevant standards of these LDRs and all other Town Ordinances
- Is in substantial conformance with all standards or conditions of any prior applicable permits or approvals

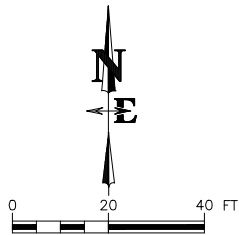
Misc.

We are categorized as a Tour Operator, but we do not check any of the boxes in the LDR's description of an "Outfitter/Tour Operator" which has equipment "for outdoor activities". We don't have trailers, boats, snowmobiles, mountain bikes, horse trailers, etc. We simply have 6 vans that come and go prior and after peak traffic times. There is virtually no activity from 8:00am to 5:00pm. Maybe create a sub-category for "Scenic Tour Operators" that only use passenger vehicles?

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DWG NAME: S:\Proj\2604\001-03 C250 N Cache-Kudar Property Site Plan\Survey\Site Map.dwg - - DATE/TIME: 3/11/2026 9:06:09 AM

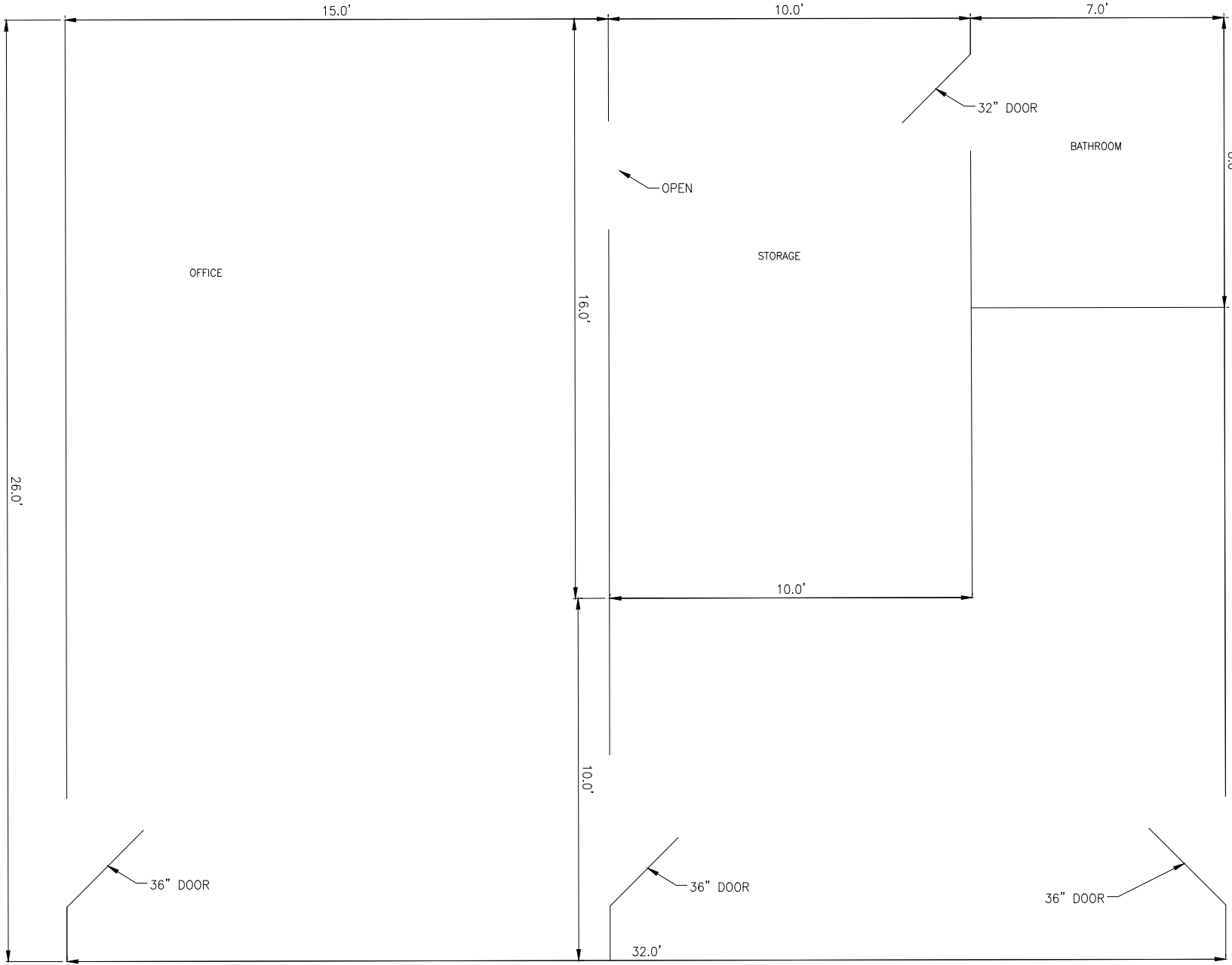


- LEGEND
- = PROPERTY LINE
 - = ADJACENT PROPERTY LINE
 - = EASEMENT LINE
 - = BUILDING LINE
 - = SETBACK
 - = CURB WITH FLOW LINE
 - = CONCRETE WALKWAY/PATIO
 - = EDGE OF PAVEMENT
 - = GRAVEL AREA
 - = BRICK PLANTER
 - = LANDSCAPING
 - = STONE LANDSCAPING
 - = WOOD DECK/PATIO
 - = RETAINING WALL
 - = TREE LINE
 - = SIGN WITH TYPE
 - = TREE - ASPEN
 - = TREE - COTTONWOOD
 - = TREE - DECIDUOUS
 - = BUSH - WILLOW

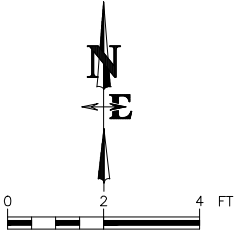


DRAWING NO	JOB TITLE	DRAWING TITLE	DATE	REV.				
				SURVEYED	ENGINEERED	DRAWN	CHECKED	APPROVED
1	250 N CACHE STREET 260 N CACHE STREET JACKSON, WY	SITE PLAN	3/10/2026			AR	LR	LR
26-001-03								

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EXISTING AND PROPOSED OCCUPANCY-TYPE B



DRAWING NO 2	JOB TITLE 260 N CACHE STREET 250 N CACHE STREET JACKSON, WY	DRAWING TITLE FLOOR PLAN		DATE 3/10/2026		REV.
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JOB NO 26-001-03				APPROVED	LR	

NELSON
ENGINEERING

P.O. BOX 1599, JACKSON WYOMING (307) 733-2087



STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Planning Department	Presenter:	Andrew Bowen
Agenda Item:	Rodeo Grounds Stealth Wireless Facility Conditional Use Permit (CUP)	Public Comment:	Yes

Purpose & Policy Considerations.

The Applicant, Diamond Communications LLC, requests a Conditional Use Permit (CUP) to replace the existing freestanding wireless telecommunications tower at the Teton County Fairgrounds with a stealth wireless communications facility integrated into the existing rodeo grandstand. Pursuant to Section 8.4.3 of the Land Development Regulations, the Planning Commission and Town Council must review the proposal and determine whether it satisfies the applicable conditional use standards.

Recommendations.

Staff requests that this item be **continued** pursuant to LDR Section 8.2.14.D.4 (Continuance of a Public Hearing) to allow the applicant additional time to refine the design of the proposed stealth wireless facility and to obtain further review and feedback from the Design Review Committee.

Suggested Motion.

I move to continue Item P26-114, a Conditional Use Permit application for a stealth wireless communications facility at 305 West Snow King Avenue, to the regularly scheduled Town Council meeting on September 21, 2026.

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Public Works	Presenter:	Johnny Ziem
Agenda Item:	Future Wastewater Treatment Plant Capacity Analysis	Public Comment:	Yes

Purpose or Policy Considerations.

The purpose of this item is for the Council to consider approval to connect Priority Areas, as recommended in the Teton County Water Quality Master Plan, to the Town of Jackson Wastewater Treatment Plant.

Recommendations.

Staff recommend approval to connect Priority Areas, as recommended in the Teton County Water Quality Master Plan, to the Town of Jackson Wastewater Treatment Plant. Additionally, staff recommend the Council direct staff to present an update to Resolution 21-28, a resolution that establishes Town policies regarding consideration of sewer and water connection requests outside of the Town and existing contract areas, to include language referencing Priority Areas.

Background.

The history of the Town of Jackson collecting and treating wastewater (sewage) from outside the Town's boundaries began with Teton County's 1977 Comprehensive Plan and a 1978 Tri-Party Agreement between the Town of Jackson, Teton County, and the Environmental Protection Agency (EPA). The Tri-Party Agreement led to the Town constructing the Town's wastewater treatment plant and appurtenant trunk line in their current locations and serving "out-of-city" customers.

The last time the Council discussed wastewater capacity was July 20, 2020, at the Council Workshop. The outcome of that presentation resulted in the Council endorsing the Water and Sewer Systems Evaluation Report Study (2020 Capacity Study), which analyzed both current and future capacity for both water and sewer systems based on zoning floor area allowances and maximum future density. The Priority Areas now before Council were not included in the 2020 Capacity Study because the Teton County Water Quality Management Plan had not yet been adopted. As it relates to the Town's Wastewater Treatment Plant (WWTP), the 2020 Capacity Study modeled and calculated future wastewater flows based upon:

1. The future build-out of the Town of Jackson
2. The future build-out of existing contracted service areas (outside of Town boundary)
3. The addition of the Northern South Park suburban zoning

In June of 2024, the Teton County Board of County Commissioners unanimously approved the Teton County Water Quality Management Plan (WQMP), a 20-year vision for the management and protection of surface and ground water resources. The WQMP identified "Priority Areas" in the County that should be connected to a centralized wastewater treatment plant, either to the Town of Jackson's WWTP or the Aspens-Pines WWTP. Assuming the Priority Areas were connected to the Town WWTP, the WQMP predicted wastewater flows using maximum density/growth factors and applied that to a 20-year built-out model.

Analysis & Key Questions.

In June of 2025, to be proactive in planning the future capacity of the Town's WWTP regarding the WQMP Priority Areas, the Public Works Department contracted with Morrison-Maierle (consultant) to:

1. Determine the future growth and wastewater capacity projections for anticipated population and density demands for the areas outside the Town as identified in the WQMP (e.g., "Priority Areas"); and

2. Determine the future growth and wastewater capacity projections for anticipated population and density demands outside, but proximate Priority Areas (e.g., “Proximate Areas”)

Morrison-Maierle completed the “Town of Jackson/Teton County Wastewater Capacity Analysis” (attached to this staff report) which reviewed the 2020 Capacity Study and the WQMP recommendations to determine future growth and ultimately, future Priority and Proximate Area wastewater flows if approved to connect to the Town’s WWTP.

Priority Areas

Priority Areas are geographic clusters of properties in Teton County that currently use septic systems in locations identified as having high aquifer vulnerability. The WQMP utilized the following criteria when prioritizing Priority Areas for connection to a centralized wastewater treatment plant:

1. Aquifer Vulnerability
2. Proximity to Existing Collection Systems (wastewater infrastructure)
3. Lot Size
4. Existing Connection Agreements
5. Collection System Capacity

The WQMP evaluated and identified candidate Priority Areas within Teton County that met the above conditions and warranted consideration for connection to the Town’s WWTP. These Priority Areas are close to private/public wastewater infrastructure and have residences/buildings connected to septic systems. The goal of connecting the Priority Areas to the Town’s WWTP is to discontinue the use of septic systems in areas of aquifer vulnerability. The following WQMP Priority Areas were included in the Public Works analysis (see attached map for reference). Please note (*) that some Priority Areas have already been approved to connect to the Town WWTP by the Council during the analysis process.

1. *Elk Refuge & Flat Creek Inns (recently approved by Council)
2. *Indian Springs Ranch (recently approved by Council)
3. North Meadow Subdivision
4. Wilson Sewer District Phase IV
5. Adams Canyon
6. Fish Creek Parcels
7. Hi Country Subdivision
8. Lake Creek Acres
9. Munger Mountain Area
10. Skyline Ranch 1
11. Skyline Ranch 2
12. South Park Ranches
13. West Bank Parcels
14. Nethercott Lane Parcels

Resolution 21-28

Since the adoption of Resolution 21-28 on November 15, 2021, the Town has utilized a three-step process for sewer service requests outside Town limits. The three-step process is:

Step 1: Request for Service. An application is filed by an applicant to request Town sewer service(s). Staff reviews and presents the request to the Council for approval. If the Council approves the request(s) for service, the applicant will advance to Step 2.

Step 2: Connection and Use Agreements. Staff work with the applicant to draft a Connection and Use Agreement (CUA) that includes the conditions of approval and any other necessary contract terms. Staff then present the CUA for Council approval, and if approved, the CUA will be executed and recorded against the property/ies.

Step 3: Permits to Construct. Staff issue a permit to construct Prior for connecting to the Town's WWTP once all fees are paid by the applicant.

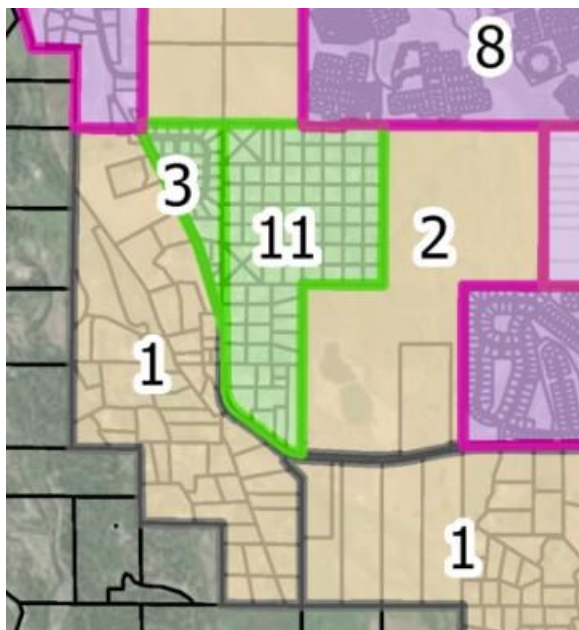
If the Council approves connecting Priority Areas to the Town's WWTP, each Priority Area applicant will go straight to Step 2 in the process.

Proximate Areas

"Proximate Areas" are areas surrounding either the Town's current contracted service areas or Priority Areas that may possibly connect to the Town's WWTP. Though not included as a recommendation in the WQMP, or in this staff report, staff thought it imperative to include Proximate Areas in determining additional future modeled flows to the Town's WWTP. The reason being is that current contracted service areas or Priority Areas may be surrounded by properties that may want to connect to the Town's WWTP in the future due to the proximity of sewer infrastructure.

Figure 1 below illustrates the concept of Proximate Areas. In this example, the purple properties are already connected to the Town's WWTP (contracted service areas), the green properties are Priority Areas, and the tan properties are Proximate Areas. This example showcases the possibility for Proximate Areas (tan) to connect to the WWTP because those properties are close to existing sewer infrastructure.

Figure 1



Though Proximate Areas are important to model to predict future Town WWTP flows, staff are not recommending the Council act on Proximate Areas at this time.

Future WWTP Flows/Wastewater Generation

Wastewater generation from the Town of Jackson, Town contracted service areas, Priority Areas, and Proximate Areas presented in the Morrison-Maierle analysis were used to estimate the timing of growth and associated increases in future wastewater flows at the Town's WWTP. Wastewater projections were determined based on past studies as a baseline,

zoning/land use information, Wyoming Department of Quality (DEQ) values, recent developments, and updated growth estimates. Findings of the analysis include the following 20-year timeline in millions of gallons per day (MGD), assuming the following areas were connected to the Town's WWTP:

- A. Town = 3.9 MGD
- B. Town + Priority Areas = 4.4 MGD
- C. Town + Priority Areas + Proximate Areas = 4.6 MGD

Historically, the Town's WWTP peak flow is in July (2.6 – 2.8 MGD). The 20-year timeline illustrates the impact of both the Priority and Proximate Areas when and if they connect to the Town's WWTP. Looking beyond the 20-year planning period, Morrison and Maierle estimate that the WWTP would reach 80% capacity in 2052, which would trigger a possible expansion and upgrade to the Town's WWTP.

Key Policy Question: Does the Council agree with staff's recommendation to approve connecting Priority Areas to the Town of Jackson Wastewater Treatment Plant?

Staff recommends yes. The environmental case is compelling, eliminating septic systems in areas of high aquifer vulnerability is one of the most direct ways the Town can protect regional water quality. The capacity analysis confirms the Town's system can accommodate Priority Area connections within the 20-year planning horizon. The County has already committed to this framework through the Water Quality Management Plan. And the streamlined process still preserves Council oversight; every Priority Area Connection and Use Agreement comes back to Council before any connection is made.

Staff also recommend the Council be aware that approving this framework does not obligate the Town to connect any specific Priority Area. If a future Priority Area presents unusual circumstances, capacity concerns, infrastructure costs, or policy conflicts, Council retains the ability to address those concerns at the Connection and Use Agreement stage.

Possible Alternatives.

Council has the option to:

1. Alternative 1: Decline connection approval of the Priority Areas at this time. By doing so, the Council could decide to approve any future Priority Areas on an individual basis, which is our current process. The consequence is that properties in high-vulnerability aquifer areas continue to rely on septic systems while awaiting individual approval, and staff continues to bring each Priority Area to Council for a Step 1 determination. Staff do not recommend this alternative, the environmental case for streamlining the Priority Area process is strong and the County has already committed to this framework.
2. Alternative 2: The Council could decide to approve only certain Priority Areas at this time. Staff could support this alternative if Council has specific concerns about particular Priority Areas, staff would return with additional information on those areas before they are approved. Each Priority Area would still require a Connection and Use Agreement before any final connection is made.
3. Alternative 3: Council could decide to defer the decision and request additional information before acting. Staff does not recommend deferral, the Morrison-Maierle analysis is complete, the County has unanimously approved the Water Quality Management Plan, and properties in Priority Areas continue to use septic systems in vulnerable aquifer areas while this decision is pending.

Comprehensive Plan & Priority Alignment.

This item advances the Town Comprehensive Plan through the following specific provisions:

- Principle 1.2 – Preserve and enhance surface water and groundwater quality

Fiscal Impact.

This fiscal impact for this item included a contract cost of \$50,000 for Morrison-Maierle to produce the Town of Jackson/Teton County Wastewater Capacity Analysis. If the Council elects to approve connecting the Priority Areas to the Town's WWTP, there will be a future cost for expansion of the WWTP facility to meet future wastewater flows. Additionally, by bringing more customers onto the Town's wastewater system, the Town will generate additional future revenue from new users.

Staff notes one tension worth naming: each outside-town connection reduces the Town's remaining treatment plant capacity and accelerates the timeline for a costly WWTP expansion. The Morrison-Maierle analysis estimates the plant could reach 80% capacity in 2052 if Priority and Proximate Areas connect at projected rates, potentially earlier depending on growth. Staff believes the environmental benefit of eliminating septic systems in vulnerable areas outweighs the capacity cost at the volumes involved, but Council should understand this tradeoff clearly before acting.

Staff Impact.

Staff impact on this item included roughly 50 hours of staff time meeting with the consultant, reviewing the completed analysis, and creating this staff report.

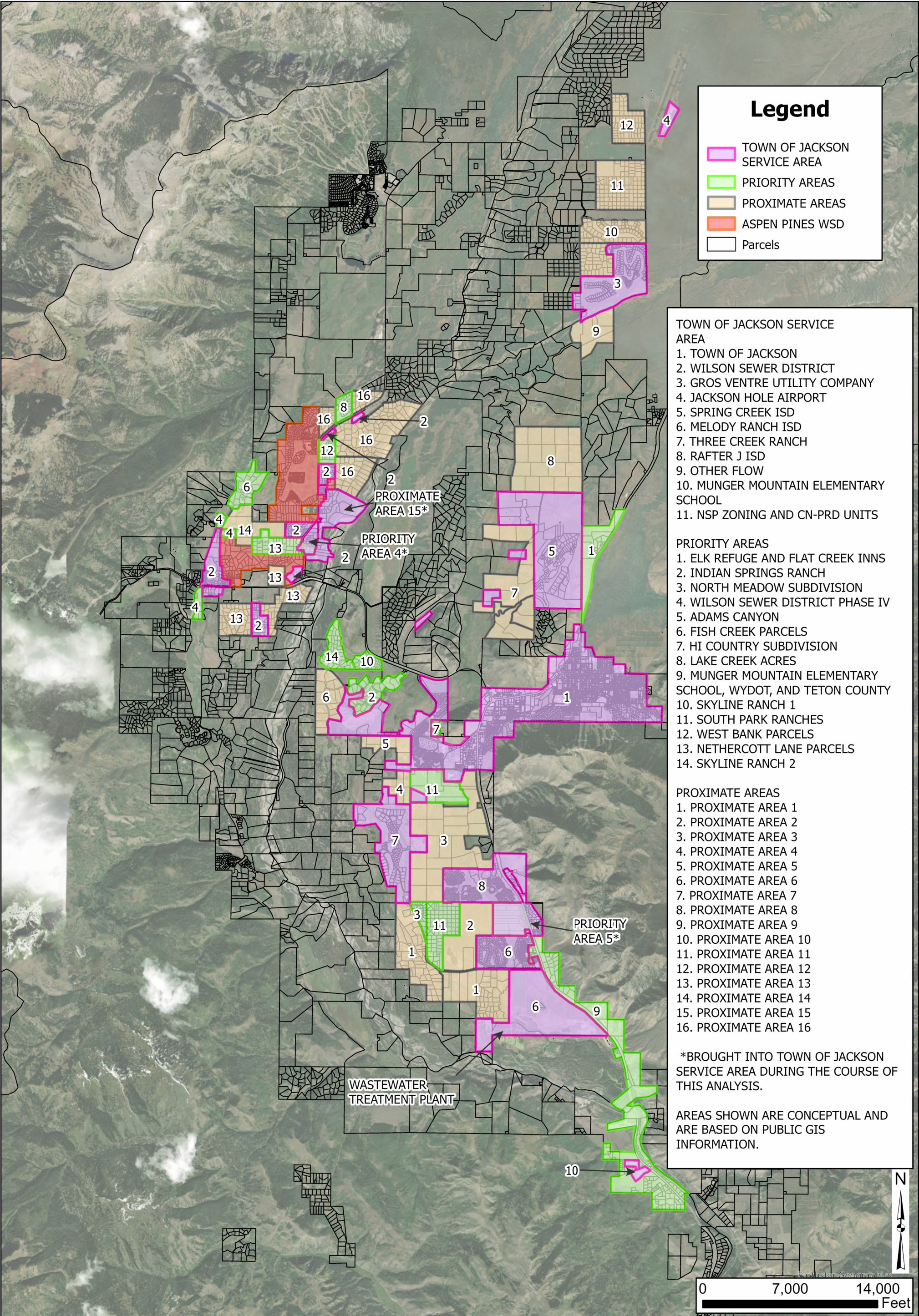
Staff also note the cumulative impact on the Legal Department for outside connections and the accompanying contracts, Public Works operations and maintenance personnel, Finance billing staff, and Wastewater Treatment Plant operators as additional customers are added to the system over time.

Attachments or Links.

- Town of Jackson Service Area Map
- Town of Jackson Wastewater Capacity Analysis Quick Reference
- Town of Jackson/Teton County Wastewater Capacity Analysis (Executive Summary pages 1 – 3)

Suggested Motion.

I move to direct staff to present an update to Resolution 21-28 that includes language referencing Priority Areas as outlined in the staff report dated August 3, 2026, at a future meeting.



Legend

TOWN OF JACKSON SERVICE AREA

PRIORITY AREAS

PROXIMATE AREAS

ASPEN PINES WSD

Parcels

- TOWN OF JACKSON SERVICE AREA
1. TOWN OF JACKSON
 2. WILSON SEWER DISTRICT
 3. GROS VENTRE UTILITY COMPANY
 4. JACKSON HOLE AIRPORT
 5. SPRING CREEK ISD
 6. MELODY RANCH ISD
 7. THREE CREEK RANCH
 8. RAFTER J ISD
 9. OTHER FLOW
 10. MUNGER MOUNTAIN ELEMENTARY SCHOOL
 11. NSP ZONING AND CN-PRD UNITS

- PRIORITY AREAS
1. ELK REFUGE AND FLAT CREEK INNS
 2. INDIAN SPRINGS RANCH
 3. NORTH MEADOW SUBDIVISION
 4. WILSON SEWER DISTRICT PHASE IV
 5. ADAMS CANYON
 6. FISH CREEK PARCELS
 7. HI COUNTRY SUBDIVISION
 8. LAKE CREEK ACRES
 9. MUNGER MOUNTAIN ELEMENTARY SCHOOL, WYDOT, AND TETON COUNTY
 10. SKYLINE RANCH 1
 11. SOUTH PARK RANCHES
 12. WEST BANK PARCELS
 13. NETHERCOTT LANE PARCELS
 14. SKYLINE RANCH 2

- PROXIMATE AREAS
1. PROXIMATE AREA 1
 2. PROXIMATE AREA 2
 3. PROXIMATE AREA 3
 4. PROXIMATE AREA 4
 5. PROXIMATE AREA 5
 6. PROXIMATE AREA 6
 7. PROXIMATE AREA 7
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 9. PROXIMATE AREA 9
 10. PROXIMATE AREA 10
 11. PROXIMATE AREA 11
 12. PROXIMATE AREA 12
 13. PROXIMATE AREA 13
 14. PROXIMATE AREA 14
 15. PROXIMATE AREA 15
 16. PROXIMATE AREA 16

*BROUGHT INTO TOWN OF JACKSON SERVICE AREA DURING THE COURSE OF THIS ANALYSIS.

AREAS SHOWN ARE CONCEPTUAL AND ARE BASED ON PUBLIC GIS INFORMATION.

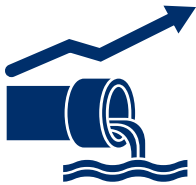


Town of Jackson

Wastewater Capacity Analysis

Purpose & Scope

- Proactive and comprehensive planning for wastewater system needs due to growth within and outside current service areas.
- Incorporation of prior studies (2021 Capacity Evaluation and Teton County WQMP) with newer information and planning approach.
- Update of growth and capacity projections for previously identified Priority Areas in the County.
- Inclusion of Proximate Areas likely to connect if sewer is extended within ~1,000 feet -new compared to previous studies.
- Consideration of long-term treatment and expansion strategies, and development of near-term WWTP improvements recommendations.



Wastewater Flow Projections

- 20-year projections (peak day flows): 3.9 MGD (Town), 4.4 MGD (Town + "Priority Areas"), 4.6 MGD (Town + "Priority Areas" + "Proximate Areas").
- Year 2080 peak day flow projected at ~6.3 MGD.
- Based on prior studies, zoning/land use, DEQ criteria, development, and updated estimates.
- The Town of Jackson Public Works and Teton County Water Quality Manager had input into assumptions, including "Priority Areas" + "Proximate Areas," development estimation.



Current WWTP Capacity & Condition

- Overall WWTP Capacity: 5.0 mgd (peak month basis).
- Overall condition is good to fair.
- Aging aeration equipment requires maintenance.
- Sludge accumulation since 1979 reduces capacity.
- Remaining equipment is generally well maintained.
- Hydraulic and treatment capacity at WWTP are not a concern related to accepting more flow from Priority and Proximate Areas in the next 20 years.

Capacity Timeline & Triggers

2026	Projected peak month flow 2.6 mgd.
2046	End of 20-year planning period (Projected peak month flow ~3.8 MGD).
2052	Flows reach approximately 80% of hydraulic capacity; initiate planning for upgrades.
2077	Hydraulic capacity reached (~5.1 MGD peak month basis).
2080	Treatment capacity evaluation recommended to determine remaining capacity without additional upgrades (~5.2 MGD basis).

Consideration of Future Treatment Needs

Potential expansion to ~6.5 MGD.
Potential year-round ammonia removal.
Potential nutrient removal upgrades.



Recommended Near-Term Improvements (2028–2033)

- Focus on lagoon Cells 1, 2, and 3A.
- Remove sludge through in-place dewatering.
- Replace surface aerators with fine-bubble diffused aeration.
- Implement improvements one at a time to maintain operation.
- Estimated implementation period of 6 years (2028–2033).

Town of Jackson / Teton County Wastewater Capacity Analysis

Town of Jackson, Wyoming

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June 18, 2026

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APPENDICES

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Appendix C	2024 WYPDES Statement of Basis and Permit
Appendix D	Aeration System Technical Memorandum



Town of Jackson

Wastewater Capacity Analysis

Purpose & Scope

- Proactive and comprehensive planning for wastewater system needs due to growth within and outside current service areas.
- Incorporation of prior studies (2021 Capacity Evaluation and Teton County WQMP) with newer information and planning approach.
- Update of growth and capacity projections for previously identified Priority Areas in the County.
- Inclusion of Proximate Areas likely to connect if sewer is extended within ~1,000 feet -new compared to previous studies.
- Consideration of long-term treatment and expansion strategies, and development of near-term WWTP improvements recommendations.



Wastewater Flow Projections

- 20-year projections (peak day flows): 3.9 MGD (Town), 4.4 MGD (Town + "Priority Areas"), 4.6 MGD (Town + "Priority Areas" + "Proximate Areas").
- Year 2080 peak day flow projected at ~6.3 MGD.
- Based on prior studies, zoning/land use, DEQ criteria, development, and updated estimates.
- The Town of Jackson Public Works and Teton County Water Quality Manager had input into assumptions, including "Priority Areas" + "Proximate Areas," development estimation.



Current WWTP Capacity & Condition

- Overall WWTP Capacity: 5.0 mgd (peak month basis).
- Overall condition is good to fair.
- Aging aeration equipment requires maintenance.
- Sludge accumulation since 1979 reduces capacity.
- Remaining equipment is generally well maintained.
- Hydraulic and treatment capacity at WWTP are not a concern related to accepting more flow from Priority and Proximate Areas in the next 20 years.

Capacity Timeline & Triggers

2026	Projected peak month flow 2.6 mgd.
2046	End of 20-year planning period (Projected peak month flow ~3.8 MGD).
2052	Flows reach approximately 80% of hydraulic capacity; initiate planning for upgrades.
2077	Hydraulic capacity reached (~5.1 MGD peak month basis).
2080	Treatment capacity evaluation recommended to determine remaining capacity without additional upgrades (~5.2 MGD basis).

Consideration of Future Treatment Needs

Potential expansion to ~6.5 MGD.
Potential year-round ammonia removal.
Potential nutrient removal upgrades.



Recommended Near-Term Improvements (2028–2033)

- Focus on lagoon Cells 1, 2, and 3A.
- Remove sludge through in-place dewatering.
- Replace surface aerators with fine-bubble diffused aeration.
- Implement improvements one at a time to maintain operation.
- Estimated implementation period of 6 years (2028–2033).

CHAPTER 0 EXECUTIVE SUMMARY

0.1 Background and Objectives

The Town of Jackson is taking a proactive approach to planning for its wastewater system as it is impacted by growth in the existing and potential future service areas. Past studies conducted by the Town and Teton County addressed many aspects of this planning effort. This report builds on the previously completed work. The analysis presented in this report addresses the following:

- Update the growth estimate and capacity needs for anticipated population and density demands for the areas outside the Town previously identified for future connection ("Priority Areas").
- Identify and determine capacity needs for areas adjacent to or proximate to Priority Areas, and that are somewhat likely to connect if sewer is extended to within 1,000 feet of the area ("Proximate Areas").
- Combine the previously developed wastewater treatment plant (WWTP) treatment capacity information with the growth projections for the Town of Jackson service area, plus the new growth projections to determine a likely schedule for needed capacity expansions at the WWTP.
- Provide a 20-year outlook for potential future expansion and treatment capability improvements.
- Provide alternatives and recommendations for immediate improvements that will support the 20-year options.

Reference documents include the Town of Jackson *2021 Capacity Evaluation*, which covered the Town of Jackson service area and WWTP capacity, and the Teton County *WQMP*, which identified Priority Areas in the County.

0.2 Wastewater Generation

Wastewater generation from the existing Town of Jackson service area, Priority Areas, and Proximate Areas presented in this analysis was used to estimate timing of growth and associated increases in wastewater flows received at the WWTP. Wastewater projections were determined based on past studies as a baseline, zoning and land use information and limitations, Wyoming Department of Environmental Quality (WY DEQ) values, recent developments, and updated growth estimates. **Findings include that the Town of Jackson service area is estimated to reach peak day flows of 3.9 million gallons per day (MGD) over the next 20 years. Priority Areas wastewater estimates increase this projection to 4.4 MGD and Proximate Areas further increase the projections to 4.6 MGD for the same 20 year period.** Those flows include a factor of 1.2 from peak month flow to peak day flows, so there is conservatism built in when comparing to the WWTP capacity.

While projections beyond 20 years are very difficult, and should only be taken as rough estimates rooted in specific assumptions, this reports assumptions were carried out to estimate an ultimate capacity requirement in 2080 of about 6.3 MGD (peak day). Estimates of this type

are intended for long-term planning strategy and will need to be tracked against actual conditions as they occur for adjustments over the coming years. A wastewater generation calculation tool is provided with this analysis with the intention that it will be updated regularly to reflect actual growth conditions as they develop.

0.3 WWTP Condition and Capacity

The Facility Condition is overall good to fair – aeration equipment is aging and beginning to show increased maintenance requirements and parts replacement needs. In addition, sludge has accumulated since the construction of the facility in 1979 and will require removal to restore the facility to its full capacity. All other equipment is well-maintained and not in need of upgrades.

The WWTP in its current configuration has a **hydraulic capacity of 5.1 mgd** based on WY DEQ design standards. The WWTP has a **treatment capacity between 5.0 and less than 6.5 mgd at peak month conditions** according to the *2021 Capacity Evaluation* (the exact value was not determined). For practical purposes, the overall capacity of the WWTP is considered to be 5.0 mgd. Peak month flow is used to define WWTP capacity. Future capacity needs are summarized in the following table.

Table 0-1 – Projected WWTP Flows¹

Year	Peak Day Flow ² (mgd)	Peak Month Flow ² (mgd)	Capacity Milestones
2026	3.07	2.56	
2046	4.61	3.84	End of 20-year planning period
2052	4.92	4.10	80% of hydraulic capacity; initiate planning for facility upgrades
2077	6.12	5.10	Hydraulic capacity met; organic treatment capacity was not evaluated as part of this analysis and may be lower
2080	6.24	5.20	Treatment capacity evaluation recommended to determine remaining treatment capacity without additional upgrades.

1. The listed flows include wastewater from the Town of Jackson, county Priority Areas, and Proximate Areas.
2. Peak day flow estimates based on Chapter 2 assumptions.

0.4 Alternatives and Recommendations

Future Treatment Considerations included:

- Treatment capacity expansion to 6.5 mgd
- Potential year-round ammonia removal
- Potential nutrient removal

These considerations shaped the alternative development addressing the near-term needs for aeration equipment upgrades, sludge removal, and clay liner replacement – all for Cells 1, 2, and 3A. No changes to the remaining cells were considered at this time.

Recommended Near-Term Improvement Alternatives included:

- Sludge removal by dewatering it in place
- Replacement of the floating surface aerators with fine-bubble diffused aeration

- Installation of geosynthetic clay liners

Implementation would be approached one lagoon cell at a time to facilitate sludge removal while the remaining cells continue to provide treatment. The implementation schedule would be about six years, from 2028 through 2033.

CHAPTER 1 INTRODUCTION

1.1 Background and Report Objectives

1.1.1 Background

The Town of Jackson has been proactive in planning for growth as it relates, among other things, to the capacity of its sewer system. The Town provides wastewater services for just under 5,000 customers within the Town limits, as well as about 1,400 customers in areas located in Teton County.

Both the Town and the County have commissioned studies and assessments over the years to keep up with the ever-changing demands on the system. Recent studies include the below-referenced *WQMP* (Teton County) and *2021 Capacity Evaluation* (Town of Jackson). The *WQMP* identified Priority Areas for connection to sewer, often based on environmental concerns, and took a very broad approach to estimating potential future wastewater flows from these areas. The *2021 Capacity Evaluation* focused on the existing capacity of the sewer system, but as it predated the broader *WQMP*, it could not relate its findings to projected future growth in the County. Both the Town and the County continue to consider other areas in the County that may be likely to connect to the sewer but were not identified in the *WQMP*.

A new analysis was needed to provide the following:

- Identify and include areas adjacent to or proximate to Priority Areas, and that are somewhat likely to connect if sewer is extended to within 1,000 feet of the area.
- Update growth estimates for previously considered Priority Areas that allow for better predicting the rate of growth and consider existing build-out.
- Develop growth estimates for newly considered Proximate Areas.
- Combine the previously developed WWTP treatment capacity information with the new growth projections to determine a likely schedule for needed capacity expansions at the wastewater treatment plant (WWTP).

1.1.2 Report Objectives

The original objectives for this analysis were developed by the Town of Jackson based on the above-listed needs and included the following:

- A. Determine the capacity need for anticipated population and density demands for the areas outside the Town previously identified for future connection ("Priority Areas"); and
- B. Determine the capacity need for anticipated population and density demands outside but proximate to those identified future areas of service ("Proximate Areas").

In conversations during scoping of the project and during initial visits and meetings, it also became apparent that needed improvements at the wastewater treatment plant (WWTP) would

need to be conceptually planned with potential future upgrade needs in mind. Therefore, the following objectives were added to the scope:

- Provide a long-term outlook for potential future expansion and treatment capability improvements.
- Provide alternatives and recommendations for immediate improvements that will support the long-term options.

1.2 References

The following references were used in the preparation of this report.

- Water Quality Management Plan – Teton County, Wyoming. Trihydro Corporation. May 2024. "*WQMP*".
- GIS data and shapefiles for the wastewater service area provided by Teton County.
- Town of Jackson Water and Sewer Systems Evaluation Report. Nelson Engineering, Vista Engineering, OPS Strategies. Town of Jackson. June 2021. "*2021 Capacity Evaluation*".
- 2024 WY DEQ Statement of Basis and Permit. Wyoming Department of Environmental Quality, effective 11/1/2024 – 10/31/2029.
- Chapter 11: Design and Construction Standards for Sewerage Systems, treatment works, disposal systems or other facilities capable of causing or contributing to pollution and mobile home park campground sewerage and public water supply distribution systems. Wyoming Administrative Rules – Department of Environmental Quality, Water Quality. June 29, 2018. "*Chapter 11*".
- Record drawings from 1979 and 1995 for the Jackson wastewater treatment plant.

While the *WQMP* and *2021 Capacity Evaluation* reports were consulted for information, the results of this analysis may differ from the findings of these earlier studies as more recent information and another approach to wastewater generation predictions were considered.

CHAPTER 2

CURRENT AND PROJECTED SERVICE AREAS AND FLOWS

2.1 Wastewater Generation Methodology

Two recent studies that were conducted by other consultants for the Town of Jackson and Teton County provided background information for this report. The first is the Town of Jackson *2021 Capacity Evaluation*. The other study effort was the *WQMP* for Teton County.

- The *2021 Capacity Evaluation* predicted wastewater generation using zoning floor area ratio (FAR) allowances and applying the highest possible uses, assuming that new or existing properties would redevelop to the maximum density by zoning.
- The *WQMP* includes Priority Areas identified for expanding the Town's wastewater service area in the County with a similar approach to the *2021 Capacity Study*. It predicts wastewater flow in 2080 using maximum density and a growth factor, divides the added flow into 60 years, and applies that to a 20-year build-out flow. The Priority Areas from the *WQMP* were added to the findings of the *2021 Capacity Evaluation* to compile existing and future planning values for wastewater treatment.

This analysis will consider the findings of those reports and further layer in another potential service designation called "Proximate Areas." Proximate Areas, for this report, are defined as properties in the County and outside the Town limits that are expected to be close enough to sewer infrastructure, potential development areas, or blocks of parcels that could work together to abandon on-site wastewater systems and connect to the Town of Jackson's public sewer. The intent is to provide a reasonable estimate of potential wastewater users to determine the Town's near-term (10 years) and long-term (20 years) treatment capacity needs if the Town were to serve these areas. The wastewater generation estimate will be used to strategically plan for anticipated future infrastructure investments at the treatment facility so it can continue to handle flows in an environmentally safe and affordable manner for the Town and its current and future contract service areas.

When determining wastewater generation for public service areas, the baseline priority is to follow regulatory requirements. The Wyoming Department of Environmental Quality (WY DEQ) wastewater design standards, Chapter 11, state that 100 gpd/capita shall be used for treatment facility design capacity unless better information, such as flow meter data, is available. This study is using the DEQ standard per capita flow for regulatory planning purposes, to be conservative. Census data can be used to project the number of people per living unit or household, which is used in gpd/unit projections. Census data from 2024 indicates an average of 2.37 people/household in Town and 2.29 people/household in Teton County. This study uses a basic projection of 250 gpd/household, which would correlate to 2.5 people/household, which is slightly higher than the census average, but provides round numbers for estimating and conservatism. Flow estimates for non-residential areas of land are based on the type of use and how many units, such as people, seats, beds, meals, or other appropriate measure to predict wastewater generation. Reference values for those non-residential uses are generally taken from DEQ Chapter 25, Table 2. Resort area flows are dependent on visitor activity, which drives

occupancies in residences, hotels, restaurants, and businesses. Full occupancy is represented by the DEQ design standard projection and application of a maximum month flow factor of 1.2 was carried through to match previous studies.

The Town public works staff has commented that many properties regularly experience redevelopment within the Town boundary. Town wastewater predictions remain with maximum density per the *2021 Capacity Evaluation* and *WQMP* for this report. Beyond that, the approach used for County Priority Areas and Proximate Areas consider established neighborhoods on a case-by-case basis. Some areas may be established with covenants and multiple owners, where decisions for redevelopment would require the consensus of many property owners and, therefore, be more difficult. Where existing subdivisions have vacant lots, development according to the allowed use, including accessory residential units (ARUs), will be applied based on the Teton County Land Development Regulations (LDRs). Other undeveloped parcels are assigned flows based on the allowable zoning density and the possible ARUs. The intention is to calculate a practical number of potential contributing units to the Town's wastewater treatment system, with the flexibility to track and account for them as they actually occur. The underlying calculations for this report can be updated over time to accomplish that through use of the provided spreadsheet model.

2.2 Wastewater Service Areas

Each wastewater service area description in the following sections includes a reference to the basis of wastewater projection for that area and summarizes the values used in the calculations. An overall map shown under Figure 2-1 and Appendix A illustrates the locations of the Town of Jackson, Priority, and Proximate Teton County areas in relation to the potential wastewater service area as a whole. Summaries of the service area zoning, wastewater contribution parameters, expected timelines, build-out percentages, and the basis of calculations are included in Appendix B.

2.3 Existing Town of Jackson Service Area

A list of current connections to the Town of Jackson was provided in the *2021 Capacity Evaluation* and *WQMP*. Included are the Town of Jackson, Wilson Sewer District, Gros Venture Utility Company, Jackson Airport, Spring Creek ISD, Melody Ranch ISD, Three Creek Ranch, Rafter J ISD, Other Flow, Munger Mountain Elementary School (MMES), and NSP Zoning and CN-PRD Units designations. The overall projected flow is provided in Figure 2-2 below and is summarized for each contributor in the individual description sections following the figure. The intention of the individual sections is to provide a record of the estimates used in this analysis which will be comparable to actual conditions in the future and allow updating of the spreadsheet model.

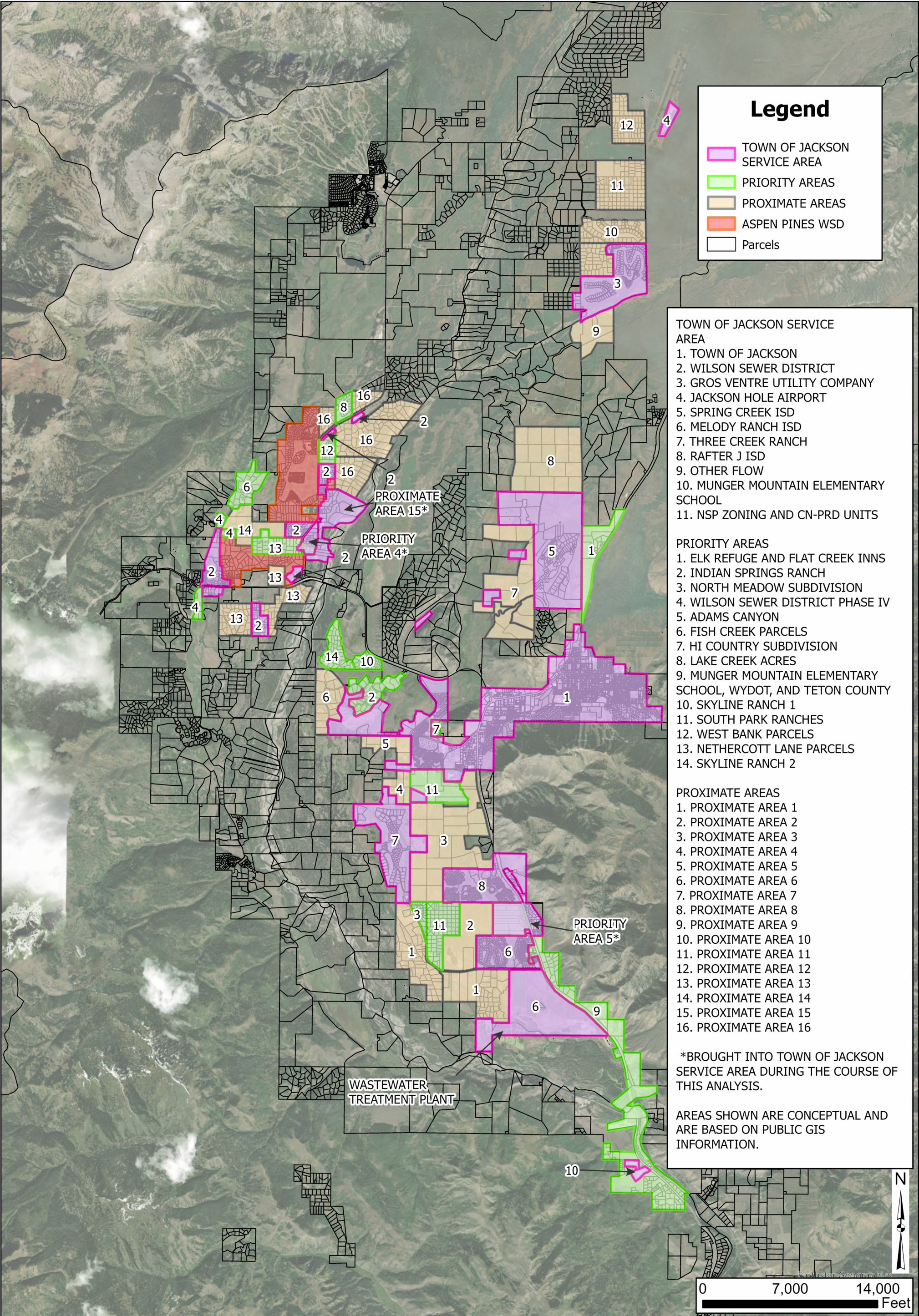
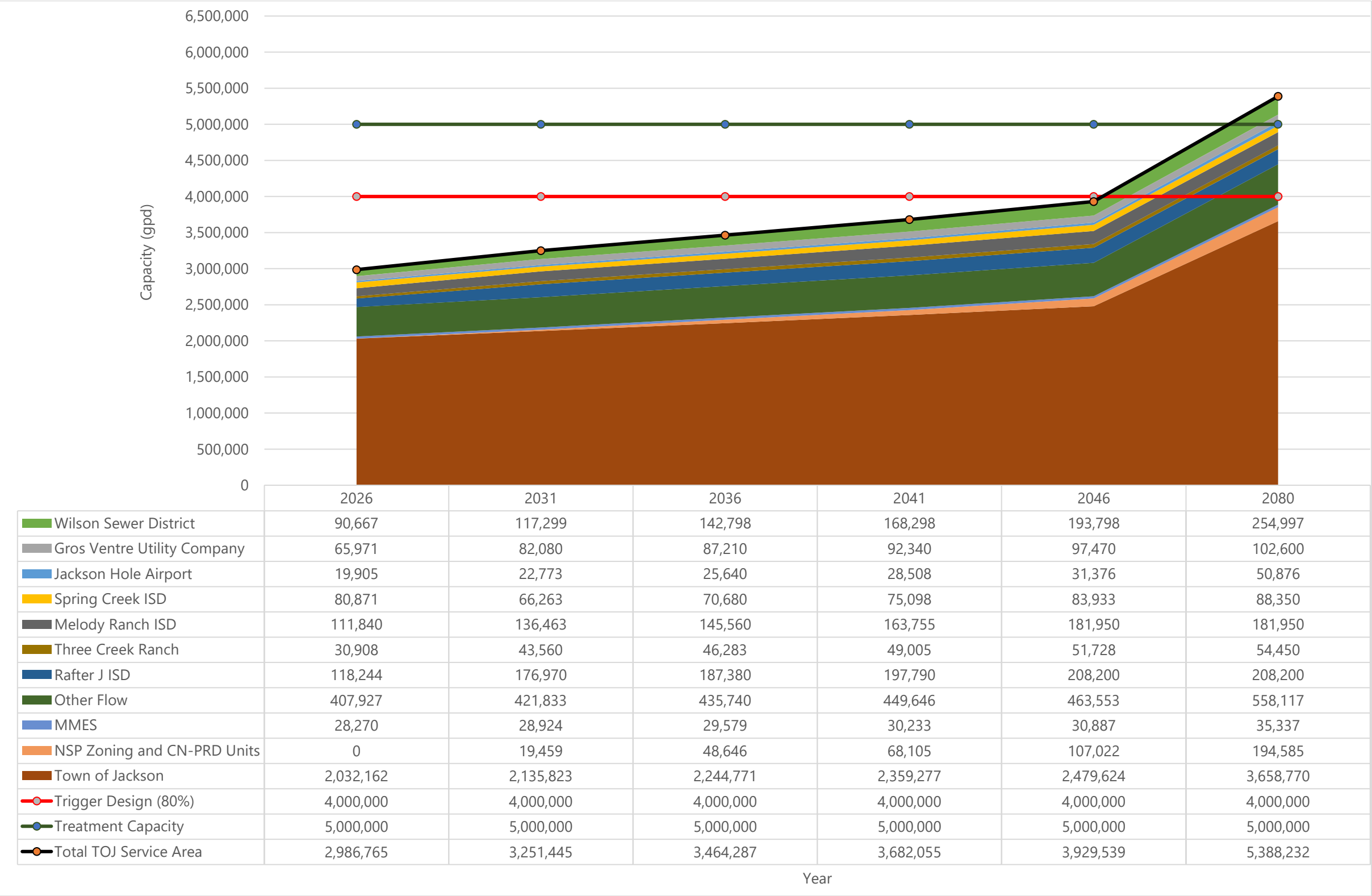


Figure 2-2 – Existing Town of Jackson Service Area Graph



Refer to the Excel tool for additional detail and ability to zoom into specific areas.

2.3.1 Town of Jackson

Wastewater produced by the Town is predicted based on the *WQMP* Attachment E-3 values. A 1% per year growth rate has been applied to flows from the current year through 2046 to match the *Comprehensive Plan-2020* growth value. The total estimated flow in 2080 is 3.66 MGD and includes redevelopment potential with bonus units of up to 1,800, which was presented in the *2021 Capacity Study*. Figure 2-3 shows the area in purple and is marked "1". See Table 2-1 below for flow projections.

Figure 2-3 – Town of Jackson

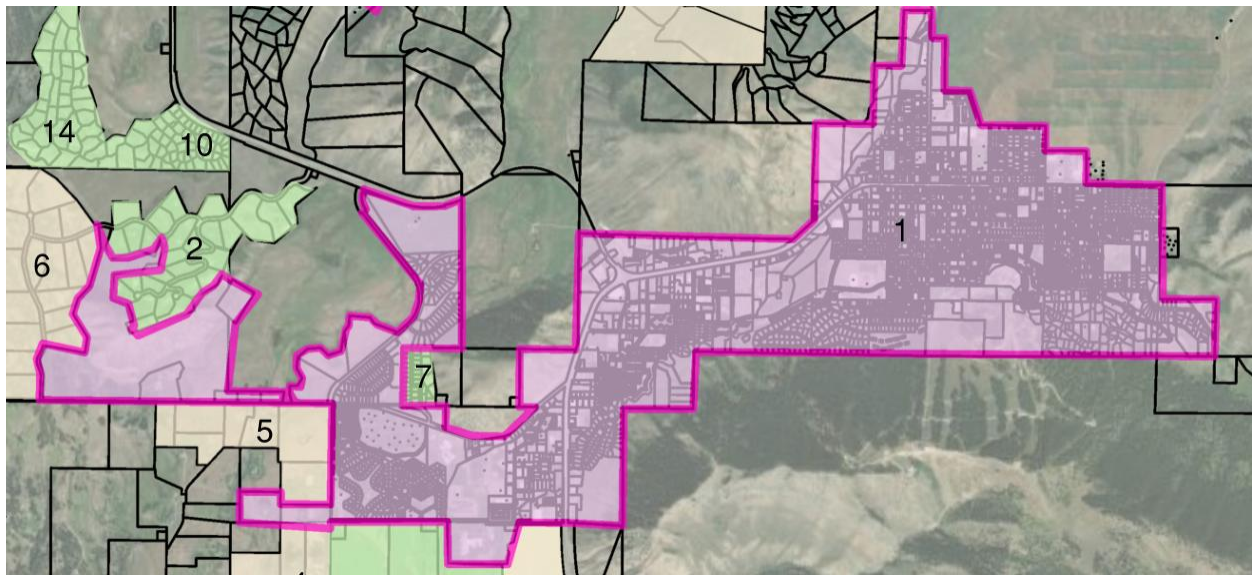


Table 2-1 – Town of Jackson

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	2,032,162	2,135,823	2,244,771	2,359,277	2,479,624	3,658,770
Build Out (%)	56	58	61	64	68	100

2.3.2 Wilson Sewer District

There were two wastewater treatment options for the Wilson Sewer District in the future. The first is maintaining service with the Town. The other is switching to service to the nearby Aspen Pines treatment facility. Since the Wilson Sewer District infrastructure is set up with the Town currently, it is more conservative to assume they will continue to use treatment capacity as listed in the *WQMP*, Attachment E-3. Figure 2-4 shows the areas in purple and marked "2". See Table 2-2, below for flow estimates.

Figure 2-4 – Wilson Sewer District

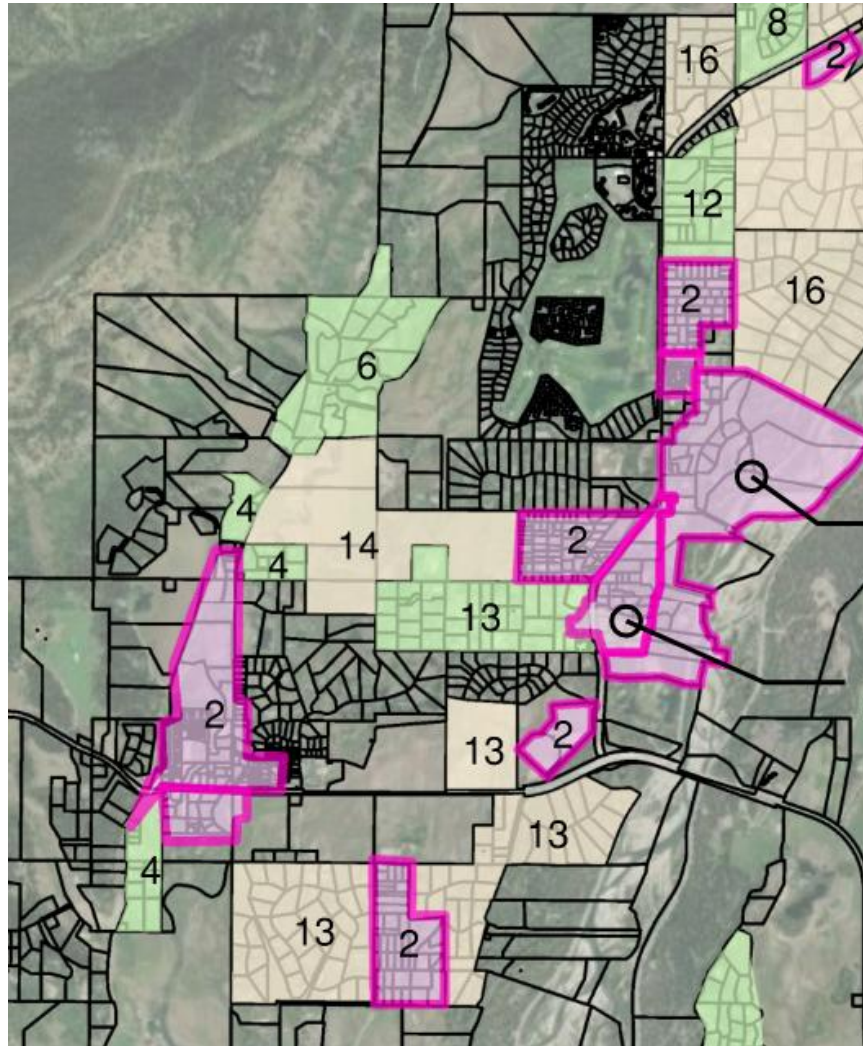


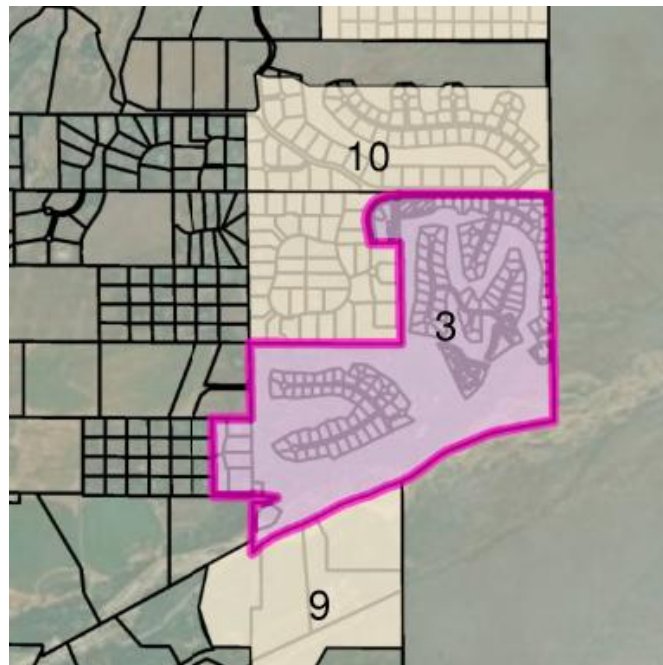
Table 2-2 – Wilson Sewer District

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	90,667	117,299	142,798	168,298	193,798	254,997
Build Out (%)	36	46	56	66	76	100

2.3.3 Gros Ventre Utility Company

Wastewater flows from the Gros Ventre Utility Company have been projected based on the number of single-family and multi-family dwellings that were counted using GIS information and applying ARU potential. The area is shown on Figure 2-5 in purple and marked "3".

Figure 2-5 – Gros Ventre Utility Company



The *WQMP*, Attachment E-3 value for current flow is 65,571 gpd. The projection for 2080 based on the area characteristics is 102,600 gpd as shown in Table 2-3.

Area Characteristics

- Zoning: 258 PR and NC parcels
- ARU: 1 ARU for PR. 50% build out assumed.

Table 2-3 – Gros Ventre Utility Company

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	65,971	82,080	87,210	92,340	97,470	102,600
Build Out (%)	75	80	85	90	95	100

2.3.4 Jackson Hole Airport

The Jackson Hole Airport is shown on Figure 2-6 in purple and marked "4". The *WQMP*, Attachment E-3 wastewater flow values were provided for the Jackson Hole Airport currently and in 2080. The times in between are interpolated, assuming straight-line growth, to generate flow value predictions for each year listed in Table 2-4.

Figure 2-6 – Jackson Hole Airport



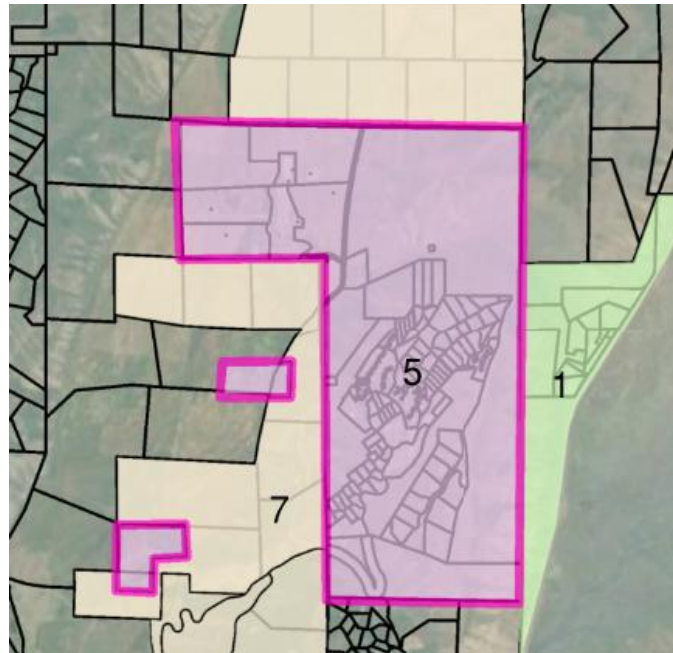
Table 2-4 – Jackson Hole Airport

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	19,905	22,773	25,640	28,508	31,376	50,876
Build Out (%)	39	45	50	56	62	100

2.3.5 Spring Creek ISD

The Spring Creek ISD is shown in Figure 2-7 in purple and marked "5".

Figure 2-7 – Spring Creek ISD



Wastewater flows from the Spring Creek ISD have been projected based on the number of single-family and multi-family dwellings that were counted using GIS information and applying ARU potential to single-family parcels. Current flow of 80,871 gpd is taken from the *WQMP*, Attachment E-3 table values. The total flow in 2080 is calculated to be 88,350 gpd using the area characteristics, with values shown in Table 2-5.

Area Characteristics

- Zoning: 204 PUD R-3 parcels
- ARU: 1 ARU for PUD R-3. 50% build out assumed.

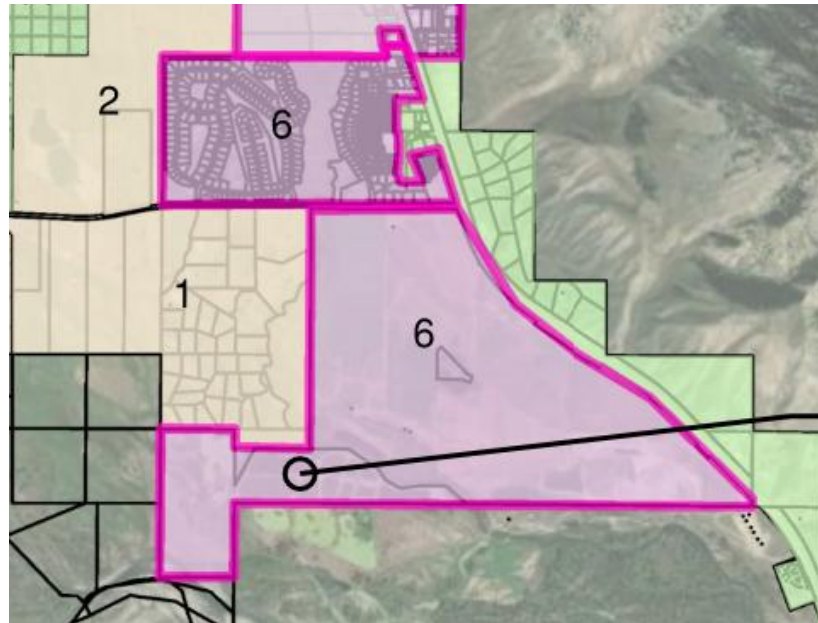
Table 2-5 – Spring Creek ISD

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	80,871	66,263	70,680	75,098	83,933	88,350
Build Out (%)	69	75	80	85	95	100

2.3.6 Melody Ranch ISD

The Melody Ranch ISD is shown in Figure 2-8 in purple and marked "6".

Figure 2-8 – Melody Ranch ISD



Wastewater flows from the Melody Ranch ISD have been projected based on the number of single-family and multi-family dwellings that were counted using GIS information and applying ARU potential for single-family parcels. Current flow of 111,840 gpd is taken from the *WQMP*, Attachment E-3 table values. The total flow in 2080 is calculated to be 181,950 gpd from the area characteristics, as shown in Table 2-6. An agreement with Melody Ranch for 72 additional units is accounted for with future development over the next 20 years.

Area Characteristics

- Zoning: 366 PUD R-3 parcels
- ARU: 1 ARU for PUD R-3. 50% build out assumed.

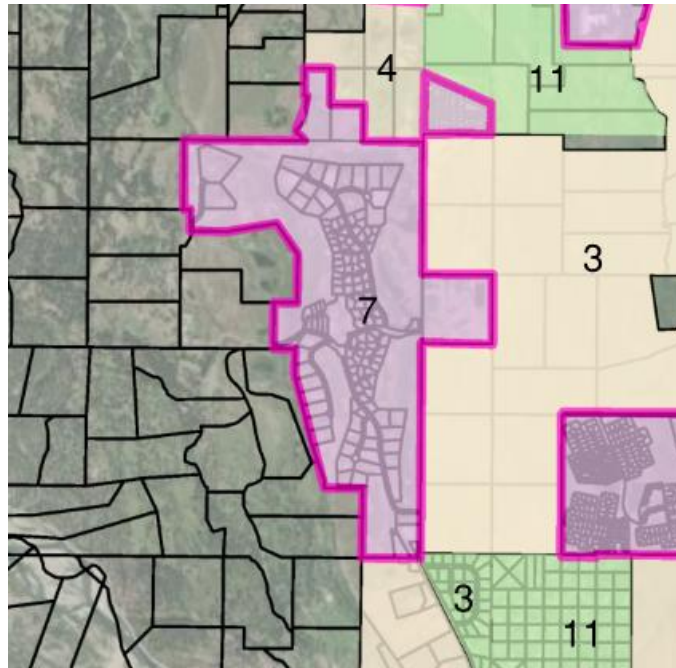
Table 2-6 – Melody Ranch ISD

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	111,840	136,463	145,560	163,755	181,950	181,950
Build Out (%)	60	75	80	90	100	100

2.3.7 Three Creek Ranch

The Triple Creek Ranch area is shown in Figure 2-9 in purple and marked "7".

Figure 2-9 – Three Creek Ranch



Wastewater flows from Three Creek Ranch have been projected based on the number of single-family dwellings that were counted using GIS information and applying ARU potential to single-family parcels. Current flow of 30,908 gpd is taken from the *WQMP*, Attachment E-3 table values. The total flow in 2080 is calculated to be 54,450 gpd from the area characteristics, as shown in Table 2-7.

Area Characteristics

- Zoning: 112 PUD R-3 parcels
- ARU: 1 ARU for PUD R-3. 50% build out assumed.

Table 2-7 – Three Creek Ranch

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	30,908	43,560	46,283	49,005	51,728	54,450
Build Out (%)	62	80	85	90	95	100

2.3.8 Rafter J ISD

The Rafter J ISD is shown in Figure 2-10 in purple and marked “8”.

Figure 2-10 – Rafter J ISD



Wastewater flows from the Rafter J ISD have been projected based on the number of single-family and multi-family dwellings that were counted using GIS information and applying ARU potential to single-family parcels. Current flow of 118,244 gpd is taken from the *WQMP*, Attachment E-3 table values. The total flow in 2080 is calculated to be 208,200 gpd using area characteristics, with values shown in Table 2-8.

Area Characteristics

- Zoning: 491 PUD R-3 parcels
- ARU: 1 ARU for PUD R-3. 50% build out assumed.

Table 2-8 – Rafter J ISD

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	118,244	176,970	187,380	197,790	208,200	208,200
Build Out (%)	71	85	90	95	100	100

2.3.9 Other Flow

The *WQMP*, Attachment E-3 wastewater flow values for current and 2080 were used for Other Flow. This item is the difference between total monthly meter readings and inflow to the WWTP according to the *2021 Capacity Study*. Inflow and infiltration were identified as contributors to this flow value. Other unmetered users could also be adding to this value. The years in between current and 2080 are interpolated assuming straight-line growth to generate the flow values in Table 2-9.

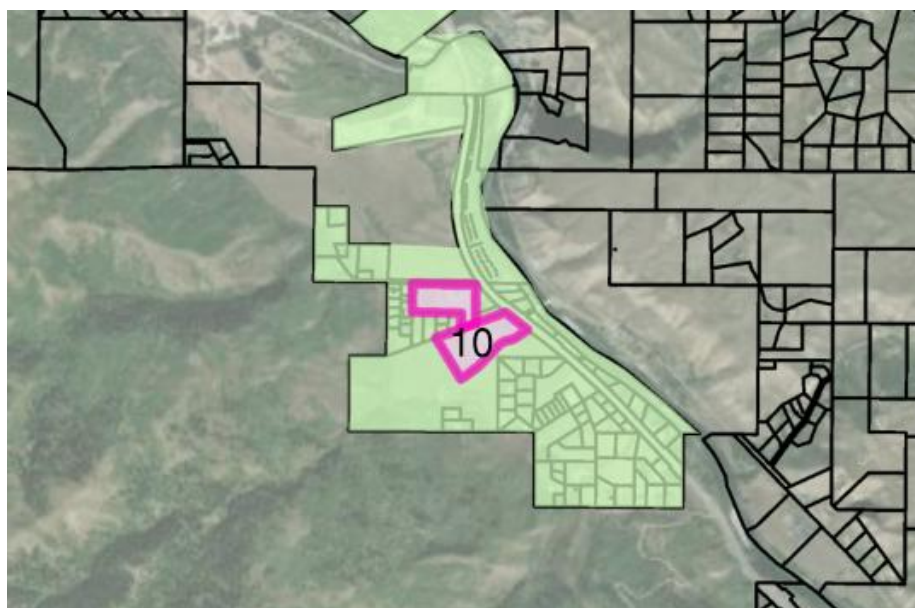
Table 2-9 – Other Flow

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	407,927	421,833	435,740	449,646	463,553	558,117
Build Out (%)	73	76	78	81	83	100

2.3.10 Munger Mountain Elementary School

The Munger Mountain Elementary School area is shown in Figure 2-11 in purple and marked "10".

Figure 2-11 – Munger Mountain Elementary School



The *WQMP*, Attachment E-3 wastewater flow values for current and 2080 were used for the existing Munger Mountain Elementary School (MMES) area. The years in between are interpolated assuming straight-line growth to generate the flow values shown in Table 2-10. A separate accounting for MMES is provided in the Priority Areas Section 2.4.9.

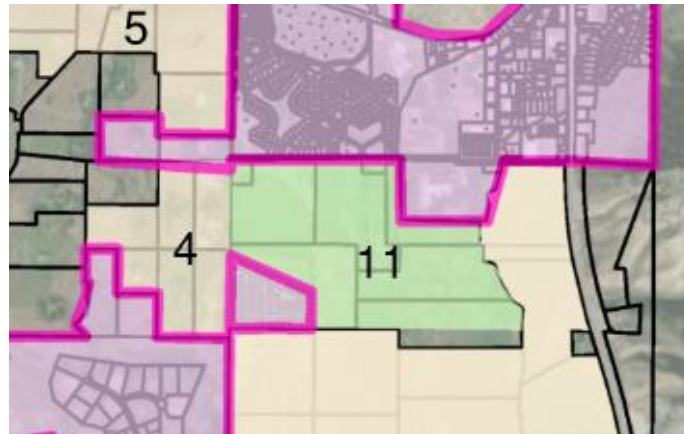
Table 2-10 – Munger Mountain Elementary School

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	28,270	28,924	29,579	30,233	30,887	35,337
Build Out (%)	80	82	84	86	87	100

2.3.11 NSP Zoning and CN-PRD Units

The NSP Zoning and CN-PRD Units area is shown in Figure 2-12 in purple and marked “11”.

Figure 2-12 – NSP Zoning and CN-PRD Units



North South Park (NSP) and the complete neighborhood-planned residential development (CN-PRD) wastewater flow is based on existing parcels and allowable uses by zoning plus an allocation of 570 units as described in the WQMP. The Town Public Works staff provided an update that 700 units are planned for use in this area. The additional units are accounted for in the 1,800 Town of Jackson bonus units in Section 2.3.1. The WQMP, Attachment E-3 flow values were used to populate this flow projection as shown in Table 2-11.

Table 2-11 – NSP Zoning and CN-PRD Units

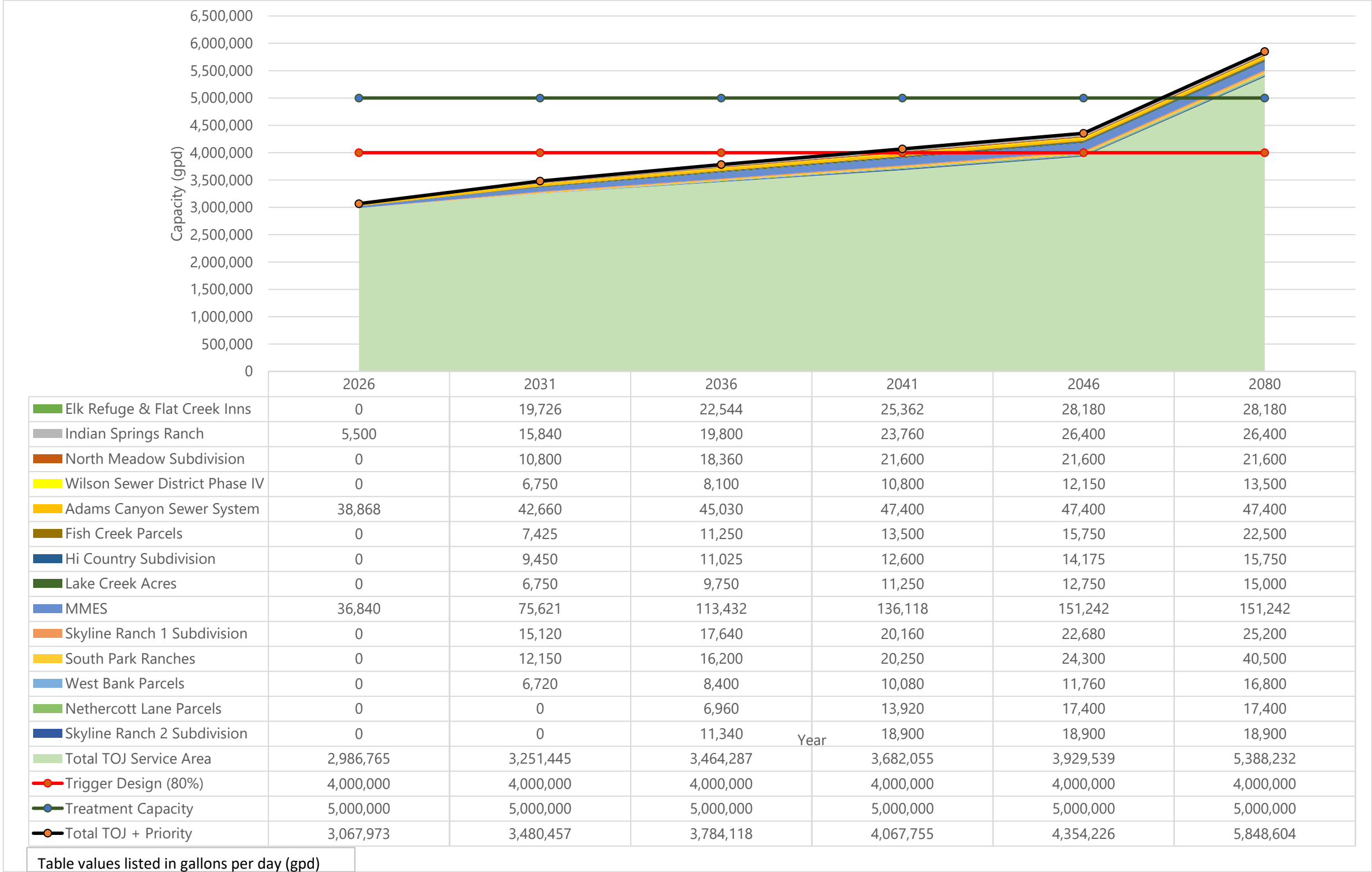
WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	19,459	48,646	68,105	107,022	194,585
Build Out (%)	0	10	25	35	55	100

2.4 WQMP Priority Areas

The *WQMP* identified Priority Areas outside of the existing Town of Jackson wastewater service area in the County where potential immediate, short-term, and long-term users are located. The timeframes listed for taking action are 2026, 2029, and 2044, respectively. Criteria for priority classifications were potential effects on groundwater, wastewater collection system nearby, lot sizes, connection agreements in place, collection system owner (Town or others), and collection system capacity availability. Two potential connection scenarios are presented in the *WQMP*. The first scenario listed under the Attachment E-3 table assigns all future connections to the Town of Jackson. The second scenario, summarized in the Attachment E-4 table, divides future connections between the Town of Jackson and the Aspen-Pines service area and treatment plant. This analysis uses the first scenario as a conservative approach. If some parcels end up connecting to Aspen-Pines for treatment instead, there will be less burden on the Town of Jackson wastewater treatment facility.

The following sections present the various Priority Areas individually. Each has a figure illustrating the area. A figure of the overall area, for a better understanding of the orientation of the areas to each other and the Town, is included in Figure 2-1 and Appendix A. The individual area descriptions are intended to provide a record of the estimates presented in this analysis which can be updated in the spreadsheet calculations based on the final development and build-out of the areas. An overall picture of the addition of Priority Areas is shown on Figure 2-13.

Figure 2-13 – WQMP Priority Areas Graph



Refer to the Excel tool for additional detail and ability to zoom into specific areas.

2.4.1 Elk Refuge and Flat Creek Inns

The Elk Refuge and Flat Creek Inns Priority Area includes properties along the North Highway 89 corridor north of Jackson shown on Figure 2-14 in a green area marked "1". It is bounded by the National Elk Refuge to the south and east, and large parcels to the north and west. The Elk Refuge and Flat Creek Inns area properties use existing on-site wastewater treatment systems. The Inns each use a large septic system with Class V wells designation. Based on the *WQMP* documentation, those systems may need to be upgraded to improve performance, with the intention of reducing ammonia levels in groundwater. Connection to the Town's wastewater system was identified as the preferred option in the *WQMP* with an immediate need and a connection agreement with the Town has been pursued. It is anticipated that 7,500 linear feet of sanitary sewer force main will be needed for the connection.

Figure 2-14 – Elk Refuge and Flat Creek Inns



Flow projections were taken from a Jorgensen submittal to the Town dated May 12, 2025. The total of 28,180 gpd, shown in Table 2-12.

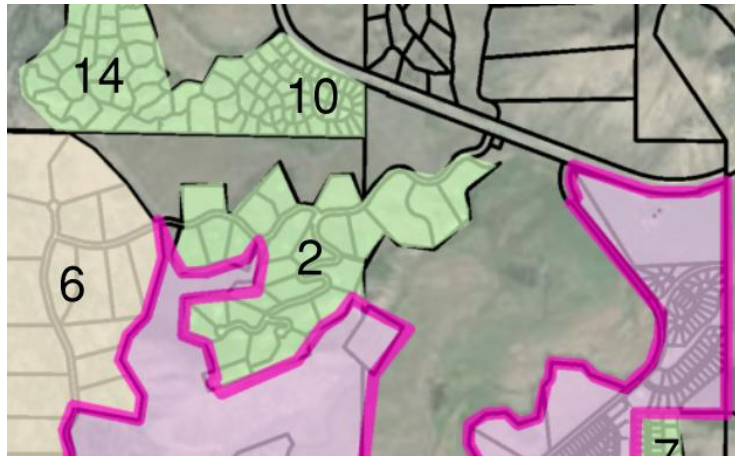
Table 2-12 - Elk Refuge and Flat Creek Inns

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	19,726	22,544	25,362	28,180	28,180
Build Out (%)	0	70	80	90	100	100

2.4.2 Indian Springs Ranch

The Indian Springs Ranch Priority Area is an existing subdivision west of Town and south of Highway 22 shown on Figure 2-15 in a green area marked "2". The properties in the Indian Springs Ranch subdivision use existing on-site wastewater treatment systems. The *WQMP* stated that this Priority Area was an immediate need and was negotiating a connection agreement with the Town. The Town has confirmed an agreement and approved a permit. The area will connect to a Town sewer main, which passes nearby.

Figure 2-15 – Indian Springs Ranch



Flow projections were provided by the Town. The total projected flow of 26,400 gpd is shown in Table 2-13.

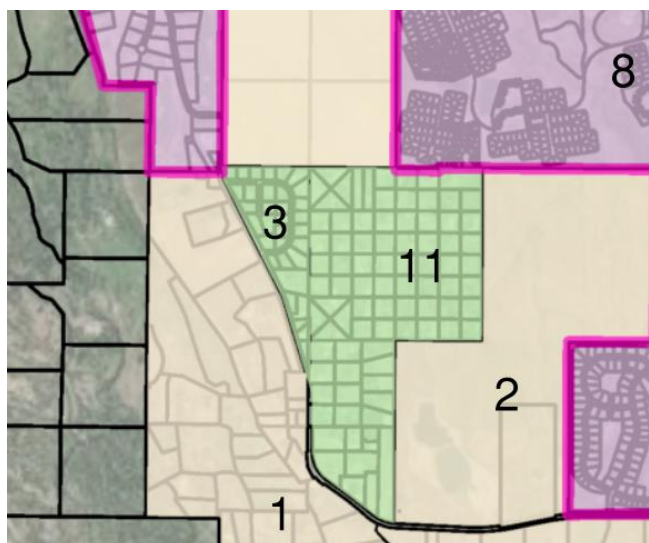
Table 2-13 – Indian Springs Ranch

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	5,500	15,840	19,800	23,760	26,400	26,400
Build Out (%)	35	60	75	90	100	100

2.4.3 North Meadow Subdivision

The North Meadow Subdivision Priority Area is an existing development south of Town, as shown on Figure 2-16 in a green area marked "3". It is accessed from South Park Loop Road. The North Meadow Subdivision properties use existing small on-site wastewater treatment systems. The *WQMP* states that this Priority Area has experienced the need to replace some of the septic systems, and there is potential to degrade groundwater. The area will connect to the nearby Three Creek Subdivision sewer main. Connection of the North Meadow Subdivision is identified in the *WQMP* as an immediate need.

Figure 2-16 – North Meadow Subdivision



This analysis estimates 21,600 gpd, shown in Table 2-14 based on the area characteristics. This area is mostly built out, but extending sewer service is estimated to take a few years.

Area Characteristics

- Zoning: 48 R-3 parcels
- ARU: 1 ARU for R-3. 50% build out assumed.

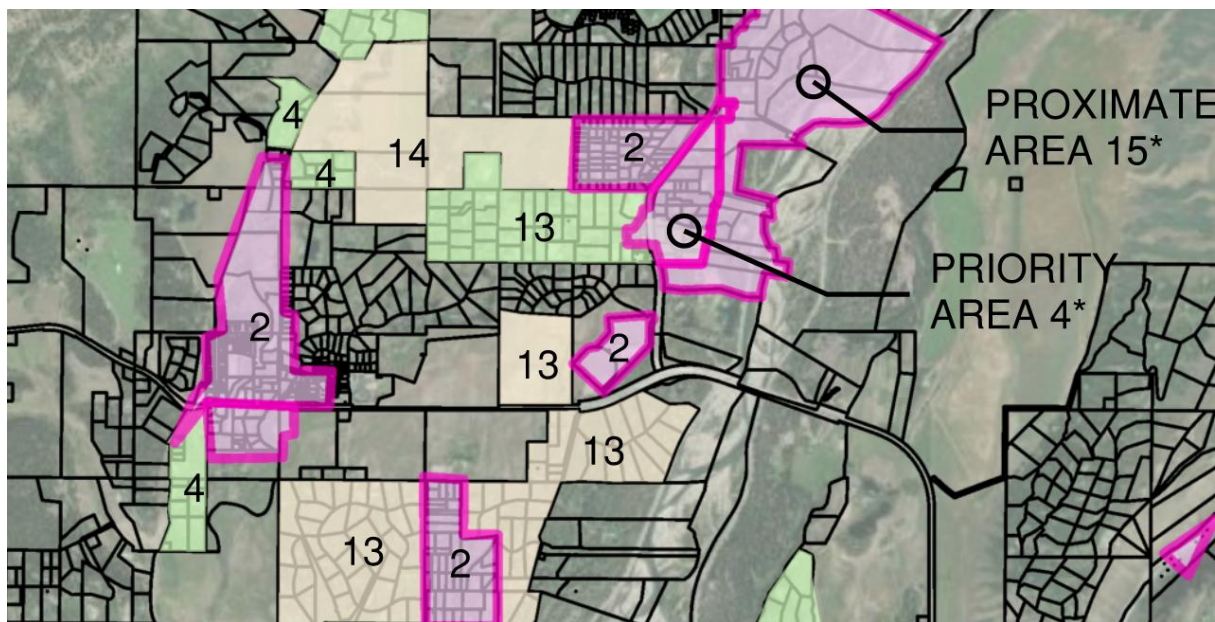
Table 2-14 – North Meadow Subdivision

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	10,800	18,360	21,600	21,600	21,600
Build Out (%)	0	50	85	100	100	100

2.4.4 Wilson Sewer District Phase IV

The Wilson Sewer District Phase IV Priority Area is an existing developed area around Wilson shown in Figure 2-17 in purple and marked "Priority Area 4". This Priority Area was in place from the WQMP and connections were made prior to completion of the analysis which is the reason it is now shown as Town of Jackson service area in the figure. The Wilson Sewer District Phase IV properties use existing small on-site wastewater treatment systems. The WQMP states that this Priority Area has been identified by the County for connection to the Wilson Sewer District when funding is available. The connection is identified in the WQMP as an immediate need and progress on services has been made east of Highway 390.

Figure 2-17 – Wilson Sewer District IV



*

This analysis estimates 13,500 gpd, shown in Table 2-15 based on the area characteristics listed.

Area Characteristics

- Zoning: 24 R-3 parcels
- ARU: 1 ARU for R-3. 100% build out assumed.

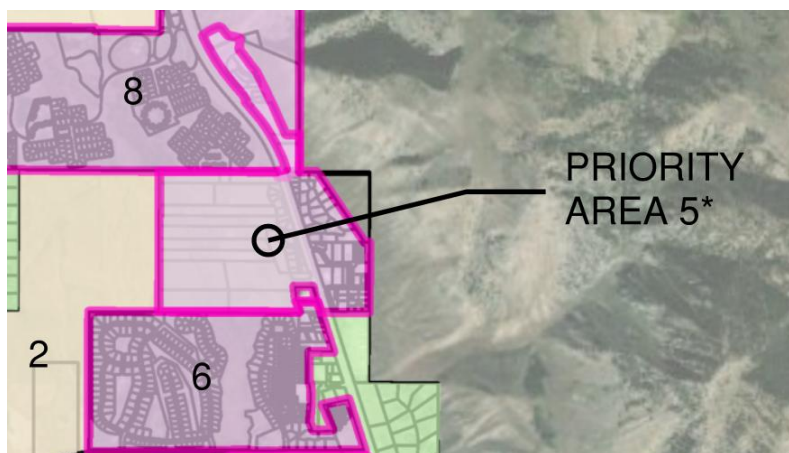
Table 2-15 – Wilson Sewer District Phase IV

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	6,750	8,100	10,800	12,150	13,500
Build Out (%)	0	50	60	80	90	100

2.4.5 Adams Canyon

The Adams Canyon Priority Area is an existing development south of Town with Rafter J Subdivision to the north and Melody Ranch Subdivision to the South. N. Highway 89 runs through the area. The area is shown on Figure 2-18 in purple and marked "Priority Area 5". This Priority Area was in place from the *WQMP* and connections were made prior to completion of the analysis which is the reason it is now shown as Town of Jackson service area in the figure. Many of the Adams Canyon Priority Area properties are already connected to the Town or the Adams Canyon District. Otherwise, some may still use existing small on-site wastewater treatment systems. The *WQMP* states that this Priority Area has been identified because the Town's sewer main and other County district collection infrastructure are in close proximity, and discontinuing use of septic systems would protect groundwater. The Adams Canyon Priority Area is identified in the *WQMP* as a short-term need.

Figure 2-18 – Adams Canyon



This analysis estimates 47,400 gpd, shown in Table 2-16, as shown in the area characteristics.

Area Characteristics

- Zoning: 12 R-2, 19 NC-TC, 46 BP-TC parcels
- ARU: 2 ARUs for R-2. 100% build out assumed.
- 500 gpd/commercial unit assumed.

Table 2-16 – Adams Canyon

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	38,868	42,660	45,030	47,400	47,400	47,400
Build Out (%)	82	90	95	100	100	100

2.4.6 Fish Creek Parcels

The Fish Creek Parcels Priority Area is an existing development north of Wilson shown on Figure 2-19 in green and marked "6". The Fish Creek Parcels use existing small on-site wastewater treatment systems. The WQMP states that this Priority Area is in close proximity to Fish Creek, and its impairment is a consideration. Connection of the Fish Creek Parcels is identified in the WQMP as a short-term need.

Figure 2-19 – Fish Creek Parcels



This analysis estimates 22,500 gpd, shown in Table 2-17, using information in the area characteristics.. This area is close to the Aspen-Pines treatment system but remains included in this report for conservative planning.

Area Characteristics

- Zoning: 2 R-1, 17 R-2, 6 PUD R-2 parcels
- ARU: 2 ARUs for R-1, R-2, and PUD R-2. 50% build out assumed.

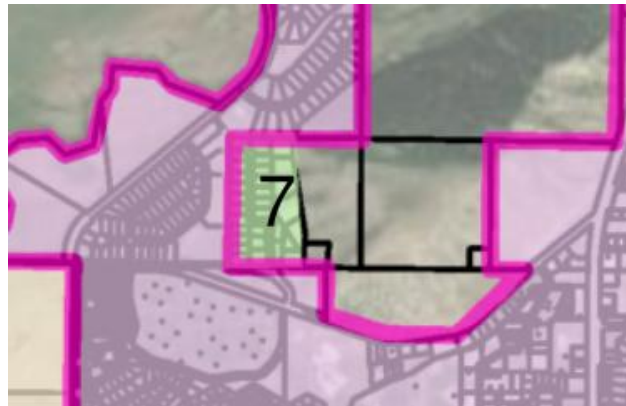
Table 2-17 – Fish Creek Parcels

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	7,425	11,250	13,500	15,750	22,500
Build Out (%)	0	33	50	60	70	100

2.4.7 Hi Country Subdivision

The Hi Country Subdivision Priority Area is an existing development on the west side of Town and south of Highway 22 as shown on Figure 2-20 in green and marked “7”. It is surrounded by the existing Town service area. The Hi Country Subdivision properties use existing on-site wastewater treatment systems. The area may connect to the Town Sewer main, which passes nearby. Connection of the Hi Country Subdivision is identified in the WQMP as a short-term need.

Figure 2-20 – Hi Country Subdivision



This analysis estimates 15,750 gpd, shown in Table 2-18 using information from the area characteristics..

Area Characteristics

- Zoning: 35 R-3 parcels
- ARU: 1 ARU for R-3. 50% build out assumed.

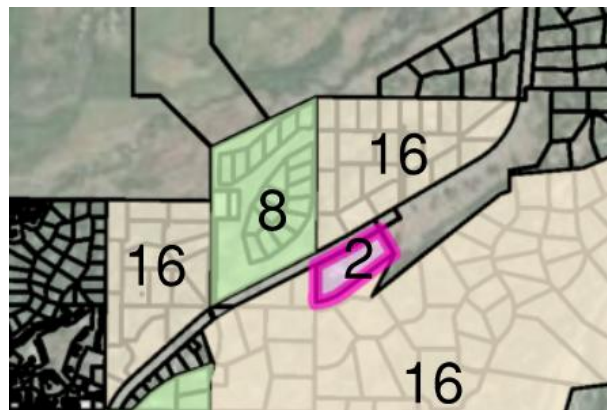
Table 2-18 – Hi Country Subdivision

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	9,450	11,025	12,600	14,175	15,750
Build Out (%)	0	60	70	80	90	100

2.4.8 Lake Creek Acres

The Lake Creek Acres Parcels Priority Area is an existing development north of Wilson on the northwest side of Highway 390 as shown on Figure 2-21 in green and marked "8". The Lake Creek Acres parcels use existing small on-site wastewater treatment systems. The WQMP states that this Priority Area is located where there is high groundwater vulnerability. Connection of the Lake Creek Acres parcels is identified in the WQMP as a short-term need.

Figure 2-21 – Lake Creek Acres



This analysis estimates 15,000 gpd, shown in Table 2-19, using information from the area characteristics.

Area Characteristics

- Zoning: 25 R-3 parcels
- ARU: 1 ARU for R-3. 100% build out assumed.

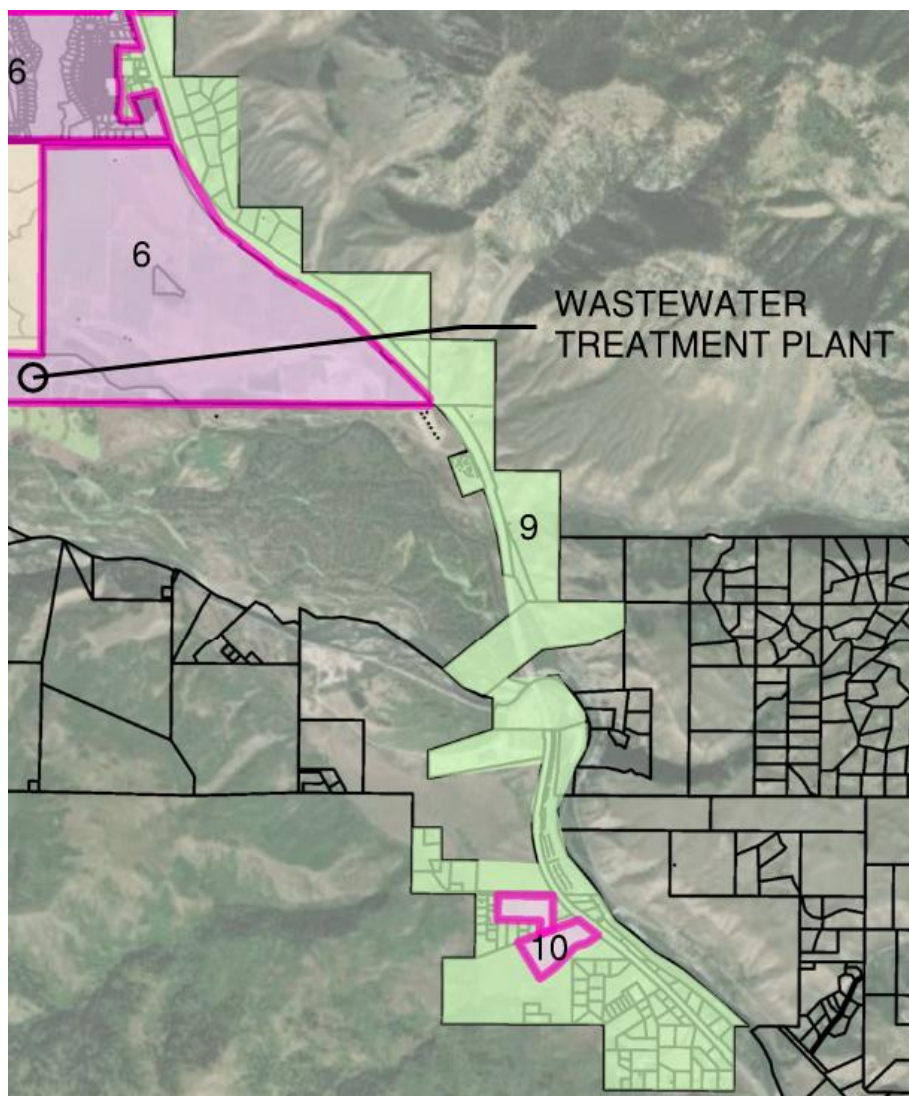
Table 2-19 – Lake Creek Acres

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	6,750	9,750	11,250	12,750	15,000
Build Out (%)	0	45	65	75	85	100

2.4.9 Munger Mountain Elementary School, WYDOT, and Teton County

The Munger Mountain Elementary School (MMES), WYDOT District 3 Building, and Teton County Weed and Pest Control Building are facilities south of Town that are currently connected to the School District sewer infrastructure. This area includes properties along the Highway 191 corridor from the Melody Ranch Subdivision on the north end, across the Snake River, and south of the MMES site. The area is shown on Figure 2-22 in green and marked "9". There is an existing lift station and pipeline that feed wastewater uphill to the treatment facility. Existing wastewater generation from the area was listed as approximately 0.01 MGD or 10,000 gpd in the *2021 Capacity Study* and 34,184 gpd in the *WQMP*, Attachment E-3. Measurements are taken from flow observed from the Munger Lift Station. Expansion of the wastewater service in the MMES is identified in the 2024 WQMP as a short-term Priority Area.

Figure 2-22 – Munger Mountain Elementary School, WYDOT, and Teton County



This area has a wide range of uses, including cabins, mobile home park, landfill/transfer station, WYDOT, Fish and Game, County Weed and Pest, school, and a recreational site, which were

itemized to provide a total wastewater generation projection of 151,242 gpd as shown in Table 2-20.

Area Characteristics

- Zoning: 12 NC, 70 WHP, 9 R-2, 3 R-1, 15 BP, 19 R-3, and 22 PUD R-3 parcels
- ARU: 1 ARU for residential. 50% build out assumed.

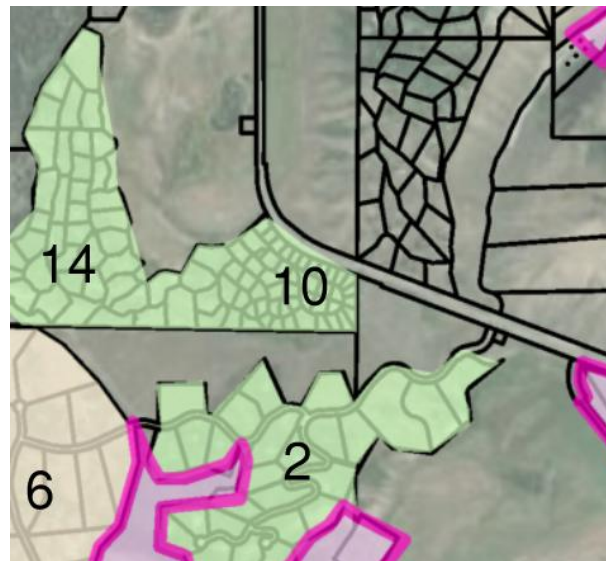
Table 2-20 – Munger Mountain Elementary School, WYDOT, Teton County

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	36,840	75,621	113,432	136,118	151,242	151,242
Build Out (%)	24	50	75	90	100	100

2.4.10 Skyline Ranch 1

The Skyline Ranch 1 Priority Area is an existing subdivision west of Town and south of Highway 22 shown on Figure 2-23 in green and marked "10". The properties use existing on-site wastewater treatment systems. The WQMP states that this Priority Area is located where there is high groundwater vulnerability. This area would connect to the Wilson District sewer main which passes nearby. Connection of the Skyline Ranch 1 subdivision is identified in the WQMP as a short-term need.

Figure 2-23 – Skyline Ranch 1



This analysis estimates 25,200 gpd, shown in Table 2-21 using the area characteristics information.

Area Characteristics

- Zoning: 56 R-3 parcels
- ARU: 1 ARU for residential. 50% build out assumed.

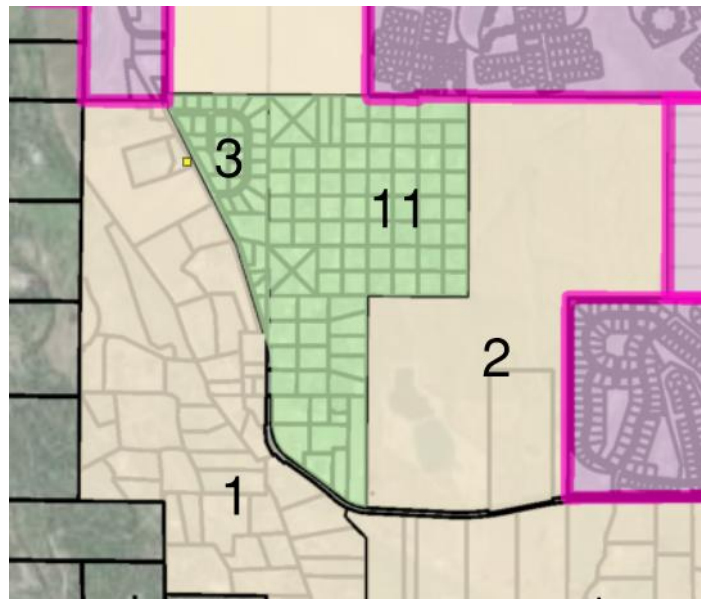
Table 2-21 – Skyline Ranch 1

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	15,120	17,640	20,160	22,680	25,200
Build Out (%)	0	60	70	80	90	100

2.4.11 South Park Ranches

The South Park Ranches Priority Area is an existing development south of Town, and west of N. Highway 89 shown on Figure 2-24 in green and marked "11". It is accessed from South Park Loop Road. The properties use existing small on-site wastewater treatment systems. The *WQMP* states that this Priority Area where there is groundwater vulnerability and close access to the Town sewer main. Connection of the South Park Ranches is identified in the *WQMP* as a short-term need

Figure 2-24 – South Park Ranches



This report estimates 40,500 gpd, shown in Table 2-22 using the area characteristics information.

Area Characteristics

- Zoning: 90 R-3 parcels
- ARU: 1 ARU for residential. 50% build out assumed.

Table 2-22 – South Park Ranches

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	12,150	16,200	20,250	24,300	40,500
Build Out (%)	0	30	40	50	60	100

2.4.12 West Bank Parcels

The West Bank Parcels Priority Area is an existing development north of Wilson on the southeast side of Highway 390. It is shown on Figure 2-25 in green and marked "12". This area uses existing small on-site wastewater treatment systems. The *WQMP* identifies that this Priority Area is located near to the Wilson Sewer District infrastructure. Groundwater protection is a priority in this area just west of the Snake River. Connection of the West Bank Parcels is identified in the *WQMP* as a short-term need.

Figure 2-25 – West Bank Parcels



This report estimates 16,800 gpd, shown in Table 2-23 based on the area characteristics information.

Area Characteristics

- Zoning: 28 NR-1 parcels
- ARU: 1 ARU for residential. 100% build out assumed.

Table 2-23 – West Bank Parcels

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	6,720	8,400	10,080	11,760	16,800
Build Out (%)	0	40	50	60	70	100

2.4.13 Nethercott Lane Parcels

The Nethercott Lane Parcels Priority Area is an existing development north of Wilson on the west side of Highway 390 shown on Figure 2-26 in green and marked "13". The parcels use existing small on-site wastewater treatment systems. The WQMP states that this Priority Area is located near potential public sewer infrastructure. Groundwater protection is a priority in this area just west of the Snake River. Connection of the Nethercott Lane Parcels is identified in the WQMP as a long-term need.

Figure 2-26 – Nethercott Lane Parcels



This report estimates 17,400 gpd, shown in Table 2-24 using the area characteristics information.

Area Characteristics

- Zoning: 29 R-3 parcels
- ARU: 1 ARU for residential. 100% build out assumed.

Table 2-24 – Nethercott Lane Parcels

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	6,960	13,920	17,400	17,400
Build Out (%)	0	0	40	80	100	100

2.4.14 Skyline Ranch 2

The Skyline Ranch 2 Priority Area is an existing subdivision west of Town and south of Highway 22 as shown in Figure 2-27 in green and marked "14". The subdivision properties use existing on-site wastewater treatment systems. The WQMP states that this Priority Area is located adjacent to Skyline Ranch 1, so there may be interest in connecting both parts of Skyline Ranch, but it is not considered as critical for groundwater protection. This area would connect to the Wilson District sewer main which passes nearby. Connection of the Skyline Ranch 2 subdivision is identified in the WQMP as a long-term need.

Figure 2-27 – Skyline Ranch 2



This report estimates 18,900 gpd, shown in Table 2-25 using the area characteristics information.

Area Characteristics

- Zoning: 42 R-3 parcels
- ARU: 1 ARU for residential. 100% build out assumed.

Table 2-25 – Skyline Ranch 2

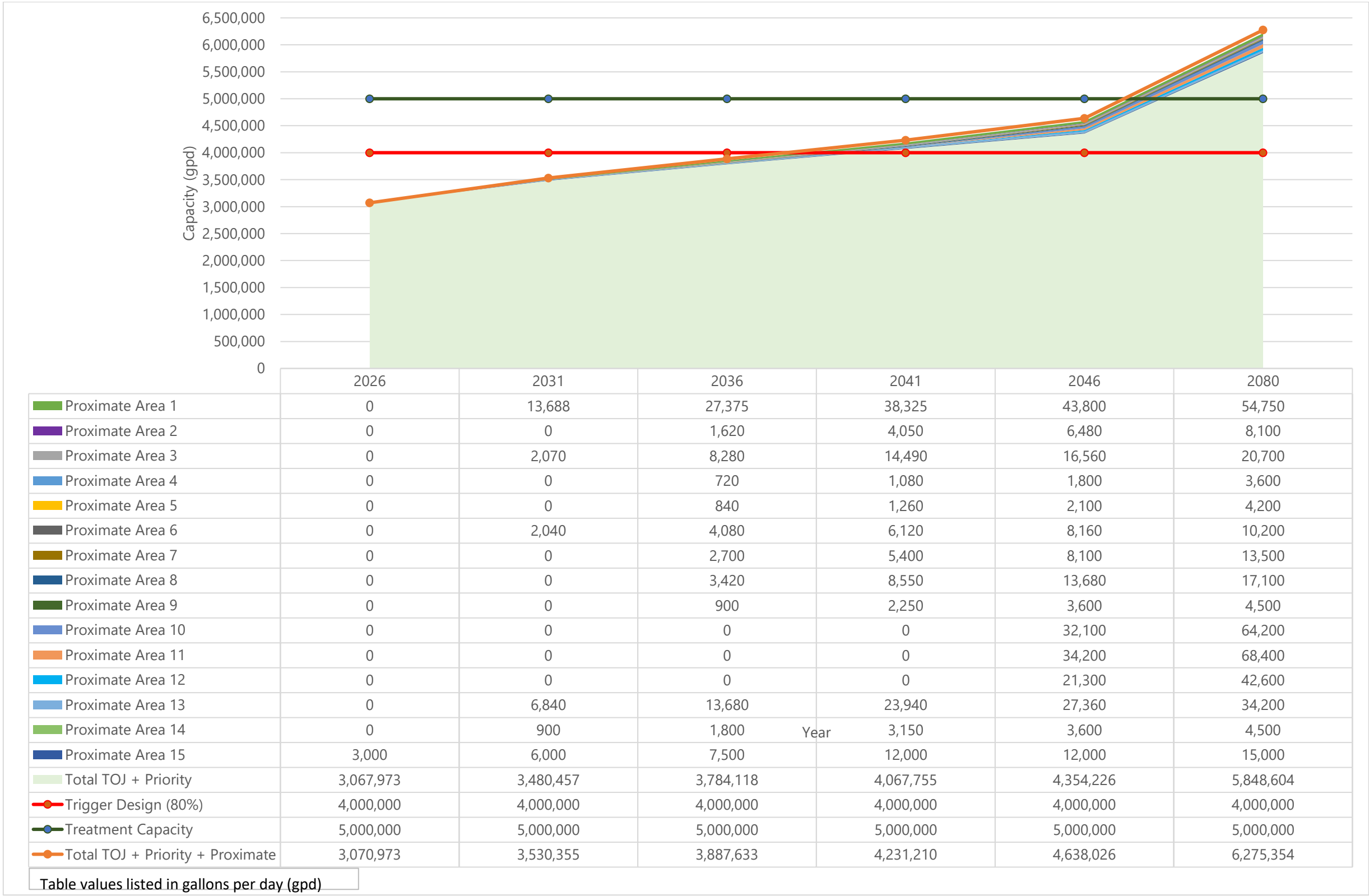
WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	11,340	18,900	18,900	18,900
Build Out (%)	0	0	60	100	100	100

2.5 Future Proximate Areas

There are parcels near existing areas currently served by the existing Town of Jackson wastewater service or that could be feasibly served in the future. Wyoming DEQ regulations require sewer services to be considered for parcels that are within 500 feet of a public sewer system. This analysis takes that distance into account with application of 1,000 feet plus the concept that groups of parcels are likely to connect when sewer infrastructure becomes more readily available. Some of the Proximate Areas are dependent on a group of owners deciding to work together to bear the costs to extend wastewater service to their collective area. That might be driven by septic system failure, the desire to use full development or ARU potential on parcels, the common goal to protect water quality, or if public funding becomes available. The Proximate Areas identified are a subjective view of likely future development patterns based on past experience in similar resort areas and discussions with Town staff. Although development and wastewater generation may not follow these predictions exactly and service to these properties is not guaranteed, the intention is that they will provide planning values sufficient to assess wastewater treatment capacity and timeline needs. The calculations used to populate this analysis are set up to be updated by the Town over time to reflect final development activities and service agreements.

The following sections describe the various Proximate Areas. Each has a figure illustrating the area. A figure of the overall area, for a better understanding of the orientation of the areas to each other and the Town, is included in Figure 2-1 and Appendix A. The individual area descriptions are intended to provide a record of the estimates presented in this analysis which can be updated in the spreadsheet calculations based on the final development and build-out that is observed. Total flow from all areas are shown on Figure 2-28.

Figure 2-28 – Proximate Area Graph

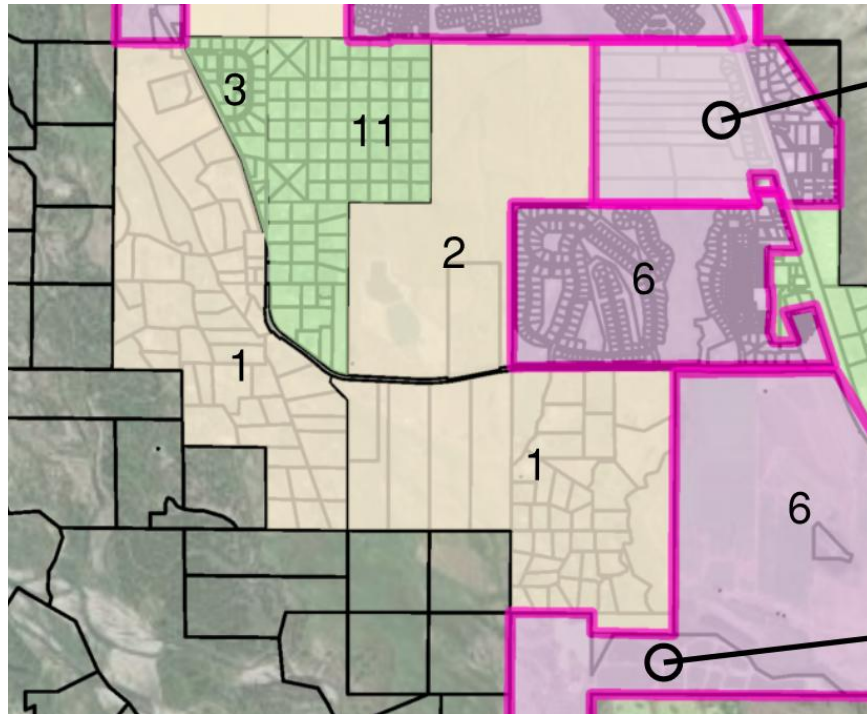


Refer to the Excel tool for additional detail and ability to zoom into specific areas.

2.5.1 Proximate Area 1

The Proximate 1 area includes parcels northwest of the Town's treatment lagoons and south of South Park Loop Road as shown in Figure 2-29 in tan and marked "1". Some of the parcels are in the Polo Ranches Subdivision, Flat Creek Fishing Club Subdivision, and Canadian Springs Subdivision. Another portion of the area is west of South Park Loop Road including multiple established parcels.

Figure 2-29 – Proximate Area 1



The Proximate Area 1 properties use existing on-site wastewater treatment systems. A groundwater protection area overlays the east edge of the Flat Creek Fishing Club Subdivision. The Town sewer main is in place on the east edge of the area which allows for sewer service connection potential. Development of larger parcels and those in the groundwater protection area would be a good fit for Town wastewater service. Connections will also become more likely if sewer infrastructure is expanded to the west. See Table 2-26 for a summary of projections.

Area Characteristics

- Zoning: 5 R-1 parcels, 66 R-2 parcels, and 27 R-3 parcels
- ARU: 2 ARUs for R-1 and R-2, 1 ARU for R-3. 50% build out assumed.

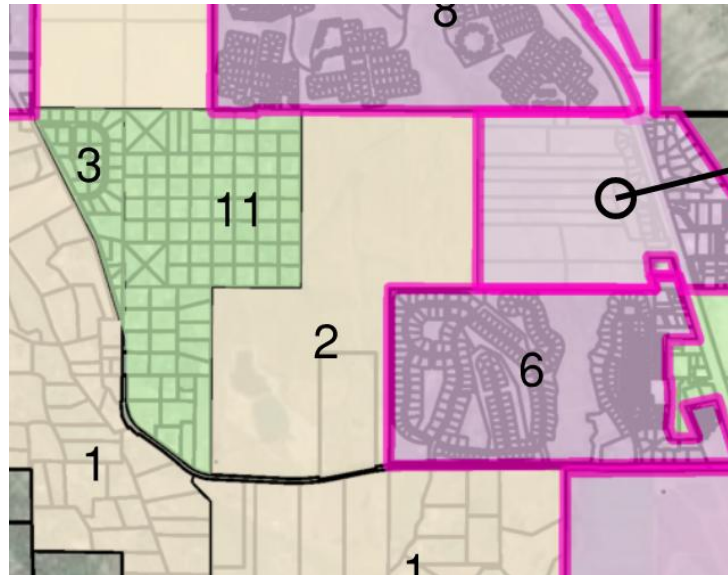
Table 2-26 – Proximate Area 1

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	13,688	27,375	38,325	43,800	54,750
Build Out (%)	0	25	50	70	80	100

2.5.2 Proximate Area 2

The Proximate 2 area includes parcels north of South Park Loop Road between Melody Ranch Subdivision and South Park Ranches as shown in Figure 2-30 in tan and marked “2”.

Figure 2-30 – Proximate Area 2



The Proximate Area 2 properties have 2-3 existing homes and use on-site wastewater treatment systems. A groundwater protection area is present at the northeast corner of the area. There is a gravel pit area with excavation down to the groundwater table. Development of the parcels would be expected to seek Town wastewater service. Connections will likely occur as infrastructure is placed closer and infill development is pursued. See Table 2-27 for a summary of projections.

Area Characteristics

- Zoning: 9 R-1 parcels (1 parcel per 35 acres).
- ARU: 2 ARUs for R-1. 100% build out assumed.

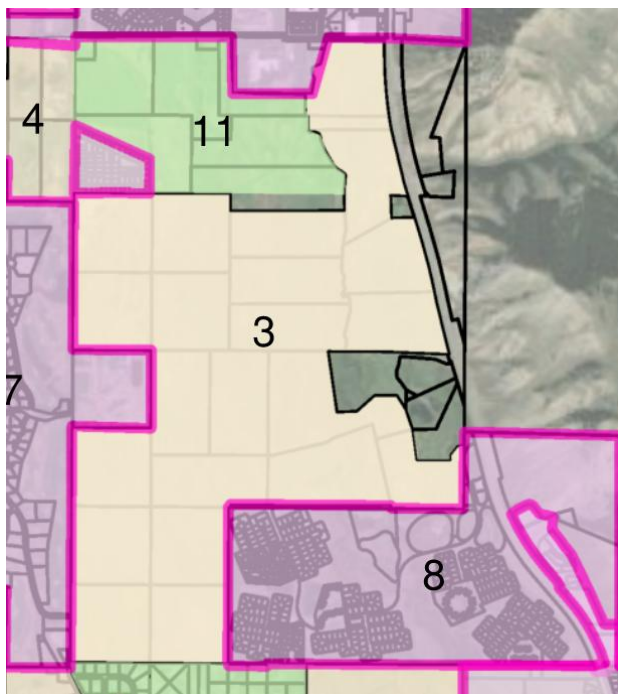
Table 2-27 – Proximate Area 2

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	1,620	4,050	6,480	8,100
Build Out (%)	0	0	20	50	80	100

2.5.3 Proximate Area 3

The Proximate 3 area includes parcels west of N. Highway 89, east of 3 Creek Ranch Subdivision, north of Rafter J Subdivision, and south of Town. The area is shown on Figure 2-31 in tan and marked "3".

Figure 2-31 – Proximate Area 3



The Proximate Area 3 properties are mostly vacant parcels with general sizes of 35-50 acres. Groundwater protection areas cover the northern portion of the area and follow the creek path. Development of parcels would be expected to seek Town wastewater service to protect groundwater and support maximizing ARUs. Since there are multiple parcels already, some may be developed individually in the coming years. See Table 2-28 for a summary of projections.

Area Characteristics

- Zoning: 23 R-1 parcels
- ARU: 2 ARUs for R-1. 100% build out assumed.

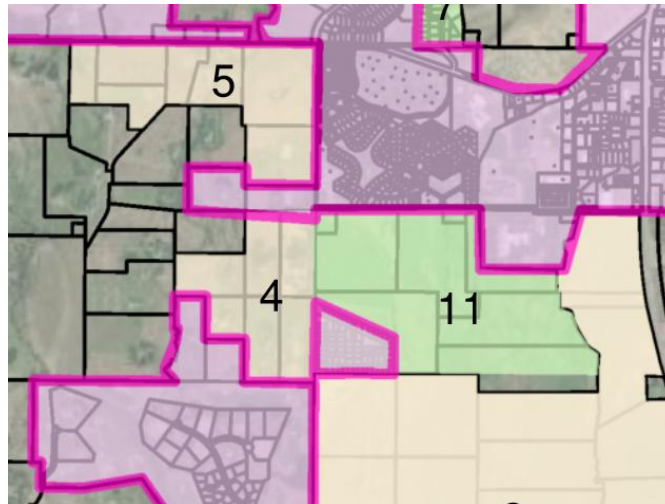
Table 2-28 – Proximate Area 3

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	2,070	8,280	14,490	16,560	20,700
Build Out (%)	0	10	40	70	80	100

2.5.4 Proximate Area 4

The Proximate 4 area includes parcels west of North South Park and north of 3 Creeks Ranch Subdivision in the Dairy Subdivision. Figure 2-32 shows the area in tan and marked as “4”.

Figure 2-32 – Proximate Area 4



The Proximate Area 4 properties are existing houses on larger acreage with on-site wastewater systems. Groundwater protection areas cover the majority of the area. There are some existing services to the Dairy Subdivision and connections will likely occur as individual owners decide to connect to support ARUs or need a septic system replacement. See Table 2-29 for a summary of projections.

Area Characteristics

- Zoning: 6 PUD R-2 parcels
- ARU: 2 ARUs for PUD R-2. 50% build out assumed.

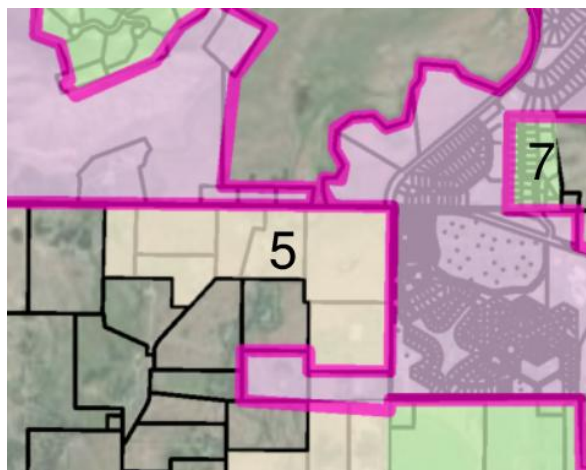
Table 2-29 – Proximate Area 4

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	720	1,080	1,800	3,600
Build Out (%)	0	0	20	30	50	100

2.5.5 Proximate Area 5

The Proximate 5 area includes parcels west of Town and south of West Boyles Hill Road in the Dairy Subdivision. The area is shown on Figure 2-33 in tan and marked "5".

Figure 2-33 – Proximate Area 5



The Proximate Area 5 properties are existing houses on larger acreage with on-site wastewater systems. Groundwater protection areas cover the majority of the area. Connections will likely occur as infrastructure is placed closer and individual owners decide to connect or need a septic system replacement. See Table 2-30 for a summary of projections.

Area Characteristics

- Zoning: 7 PUD R-2 parcels
- ARU: 2 ARUs for PUD R-2. 50% build out assumed.

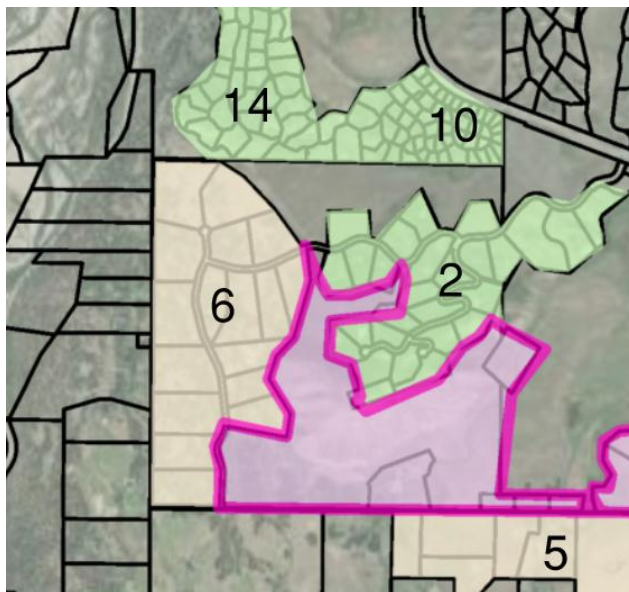
Table 2-30 – Proximate Area 5

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	840	1,260	2,100	4,200
Build Out (%)	0	0	20	30	50	100

2.5.6 Proximate Area 6

The Proximate 6 area includes parcels west of Town and north of West Boyles Hill Road in the Indian Springs Ranch Subdivision. The area is shown on Figure 2-34 in tan and marked "6".

Figure 2-34 – Proximate Area 6



The Proximate Area 6 properties are existing houses on larger acreage with on-site wastewater systems. Groundwater protection delineations do not overlay the area. The eastern portion of Indian Springs Ranch Subdivision is a Priority Area as presented in Section 2.4.2. Sewer infrastructure will be extended in the near term, so existing houses may connect, and ARUs can be implemented over time. See Table 2-31 for a summary of projections.

Area Characteristics

- Zoning: 17 PUD R-2 parcels
- ARU: 2 ARUs for PUD R-2. 50% build out assumed.

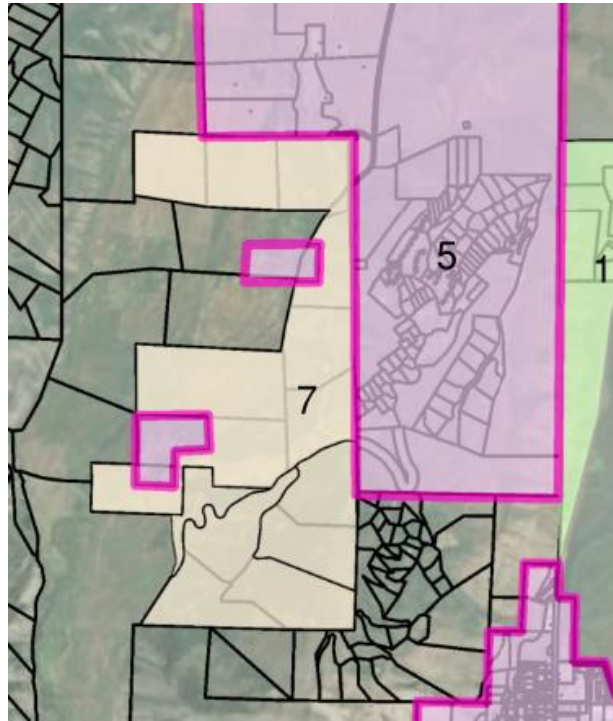
Table 2-31 – Proximate Area 6

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	2,040	4,080	6,120	8,160	10,200
Build Out (%)	0	20	40	60	80	100

2.5.7 Proximate Area 7

The Proximate 7 area includes parcels west on both sides of Spring Gulch Road, north of Saddle Butte Subdivision, and west of the Spring Creek ISD. The area is shown on Figure 2-35 in tan and marked "7".

Figure 2-35 – Proximate Area 7



The Proximate Area 7 properties are mostly vacant 30-50 acre parcels with a few existing on-site wastewater systems. The existing Spring Creek ISD sewer mains follow Spring Gulch Road and E. Butte Road, which provide close access to potential connections. Groundwater protection delineation included four parcels in the southeastern corner of the area. The actual timeline of service connections will depend on the variable development of many individual parcels and the need for septic replacement or new construction. See Table 2-32 for a summary of projections.

Area Characteristics

- Zoning: 12 R-1 and 3 R-2 parcels
- ARU: 2 ARUs for R-1 and R-2, 100% build out assumed.

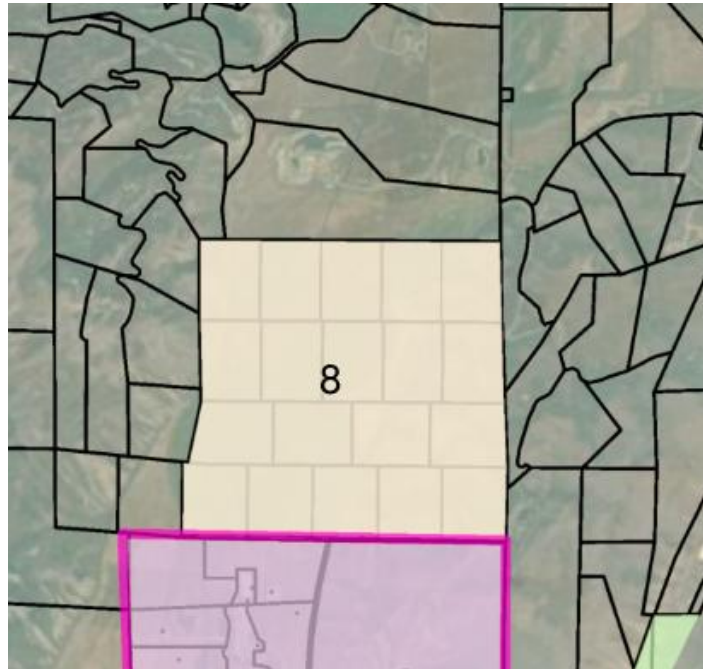
Table 2-32 – Proximate Area 7

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	2,700	5,400	8,100	13,500
Build Out (%)	0	0	20	40	60	80

2.5.8 Proximate Area 8

The Proximate 8 area includes parcels on both sides of Spring Gulch Road, north of the Spring Creek ISD and south of the Gros Ventre River. The area is shown on Figure 2-36 in tan and marked "8".

Figure 2-36 – Proximate Area 8



The Proximate Area 8 properties are mostly vacant 35 acre parcels with an existing residence. The Gros Ventre sewer main currently in use runs along Spring Gulch Road, so there is close access to potential connections. Groundwater protection delineation does not overlay these parcels. Since there are existing parcels, some may begin to develop individually, but this is expected to be a longer-term need. See Table 2-33 for a summary of projections.

Area Characteristics

- Zoning: 19 R-1 parcels
- ARU: 2 ARUs for R-1, 100% build out assumed.

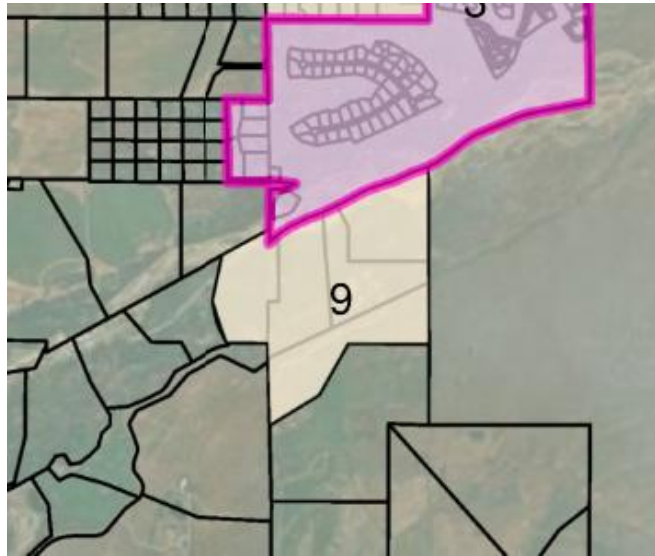
Table 2-33 – Proximate Area 8

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	3,420	8,550	13,680	17,100
Build Out (%)	0	0	20	50	80	100

2.5.9 Proximate Area 9

The Proximate 9 area includes parcels west on both sides of Spring Gulch Road, just south of the Gros Ventre River. The area is shown on Figure 2-37 in tan and marked "9".

Figure 2-37 – Proximate Area 9



The Proximate Area 9 properties are mostly vacant 35 acre or greater parcels with an existing residence. The Gros Ventre sewer forcemain currently follows Spring Gulch Road and there is a lift station on the north side of the river. The best access for potential connections would be at the south end of the area. Groundwater protection delineation overlays these parcels on the north side adjacent to the river. This area is existing parcels that are near existing developed properties and may also experience some development. See Table 2-34 for a summary of projections.

Area Characteristics

- Zoning: 5 R-1 parcels
- ARU: 2 ARUs for R-1, 100% build out assumed.

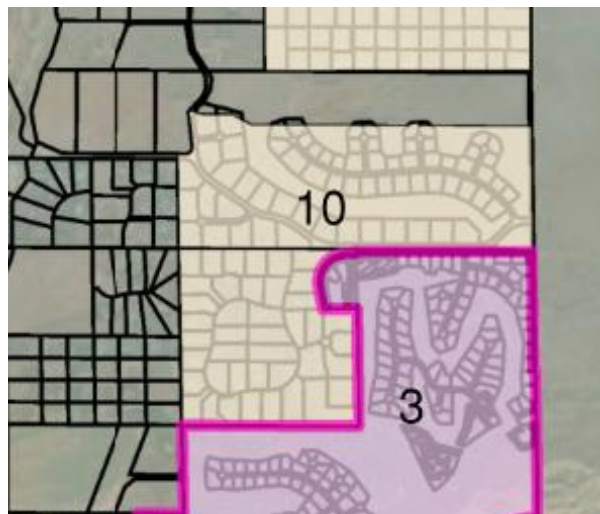
Table 2-34 – Proximate Area 9

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	900	2,250	3,600	4,500
Build Out (%)	0	0	20	50	80	100

2.5.10 Proximate Area 10

The Proximate 10 area includes parcels north and west of the Jackson Hole Golf and Tennis Club and split by East Sagebrush Drive including the Bar-B-Bar Meadows Subdivision and Fairway Estates Subdivision. The area is shown on Figure 2-38 in tan and marked “10”.

Figure 2-38 – Proximate Area 10



The Proximate Area 10 properties are existing developed areas with some vacant lots that use on-site wastewater systems. The Gros Ventre sewer main is currently in place along the eastern boundary of the area. Groundwater protection delineation does not affect these parcels. Wastewater flow would likely be due to blocks of owners deciding to connect to address aging septic systems or implementation of ARUs with a timeframe of 20 years or more. See Table 2-35 for a summary of projections.

Area Characteristics

- Zoning: 39 R-3 and 68 PUD R-3 parcels
- ARU: 1 ARU for R-3 and PUD R-3, 50% build out assumed.

Table 2-35 – Proximate Area 10

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	0	0	32,100	64,200
Build Out (%)	0	0	0	0	50	100

2.5.11 Proximate Area 11

The Proximate 11 area includes a block of parcels southwest of the Jackson Hole Airport shown on Figure 2-39 in tan and marked "11".

Figure 2-39 – Proximate Area 11



The Proximate Area 11 properties include existing developed areas with some vacant lots that use on-site wastewater systems. The Airport sewer main is currently in place along the eastern boundary of the area. Groundwater protection delineation does not affect these parcels. Wastewater flow could occur over the next 20 years and beyond due to aging septic systems or implementation of ARUs, but it is expected that multiple properties would need to participate in the sewer connection to be viable. See Table 2-36 for a summary of projections.

Area Characteristics

- Zoning: 114 R-3
- ARU: 1 ARU for R-3, 50% build out assumed.

Table 2-36 – Proximate Area 11

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	0	0	34,200	68,400
Build Out (%)	0	0	0	0	50	100

2.5.12 Proximate Area 12

The Proximate 12 area includes a block of parcels west of the Jackson Hole Airport as shown on Figure 2-40 in tan and marked "12".

Figure 2-40 – Proximate Area 12



The Proximate Area 12 properties are existing developed areas with some vacant lots that use on-site wastewater systems. The Airport sewer main is currently in place along the southeastern boundary of the area. Groundwater protection delineation does not affect these parcels. Wastewater flow may occur over the next 20 years and beyond due to aging septic systems or ARU implementation. See Table 2-37 for a summary of projections.

Area Characteristics

- Zoning: 71 R-3
- ARU: 1 ARU for R-3, 50% build out assumed.

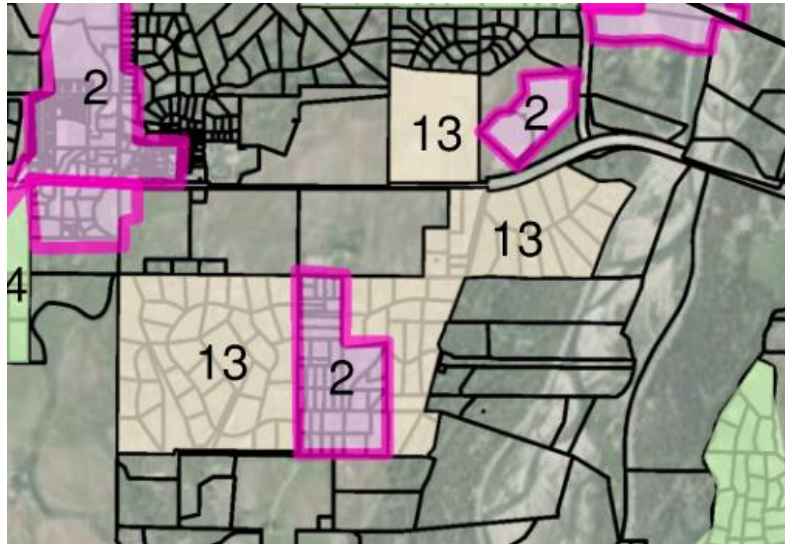
Table 2-37 – Proximate Area 12

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	0	0	0	21,300	42,600
Build Out (%)	0	0	0	0	50	100

2.5.13 proximate Area 13

The Proximate 13 area includes a block of parcels south of Highway 22 and just east of Wilson. There is an existing Town service area in the middle of the area on Wenzel Lane. The area is shown in Figure 2-41 in tan and marked "13".

Figure 2-41 – Proximate Area 13



The Proximate Area 13 properties are existing developed areas with some vacant lots that use on-site wastewater systems. A Wilson sewer main is currently in place in Wenzel Lane and Highway 22. Groundwater protection delineation covers a majority of the parcels. Wastewater flow is expected to increase by 50% within 10 years due to the presence of the Town sewer main and groundwater protection potential. See Table 2-38 for a summary of projections.

Area Characteristics

- Zoning: 3 R-2, 72 R-3
- ARU: 2 ARUs for R-2 and 1 ARU for R-3, 50% build out assumed.

Table 2-38 – Proximate Area 13

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	6,840	13,680	23,940	27,360	34,200
Build Out (%)	0	20	40	70	80	100

2.5.14 Proximate Area 14

The Proximate 14 area includes a block of parcels north of Highway 22 and west of Highway 390 in the Wilson area. There is an existing Wilson Sewer District service area to the east of the area. This area is shown on Figure 2-42 in tan and marked "14".

Figure 2-42 – Proximate Area 14



The Proximate Area 14 properties are existing larger acreage parcels. Existing residences use on-site wastewater systems. The Wilson Sewer District sewer mains are currently in place surrounding the area. Groundwater protection delineation completely covers the parcels. Wastewater flow is expected to increase within 10 years due to the presence of the Town sewer main and the potential for groundwater protection. See Table 2-39 for a summary of projections.

Area Characteristics

- Zoning: 2 R-1, 3 R-2
- ARU: 2 ARUs for R-1 and R-2, 100% build out assumed.

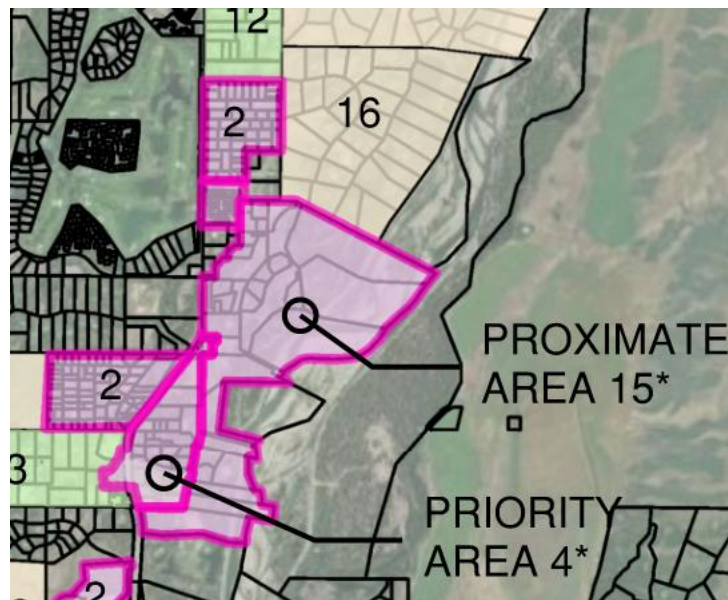
Table 2-39 – Proximate Area 14

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	900	1,800	3,150	3,600	4,500
Build Out (%)	0	20	40	70	80	100

2.5.15 Proximate Area 15

The Proximate Area 15 location includes a block of parcels north of Highway 22 and east of Highway 390 in the Wilson area. There is an existing Wilson Sewer District service area to the west of the area. This area is shown on Figure 2-43 in purple and marked "Proximate Area 15". This Proximate Area was delineated during the analysis and connections were made prior to completion of the analysis which is the reason it is now shown as Town of Jackson service area in the figure.

Figure 2-43 – Proximate Area 15



*Service area now overlaps the Proximate area

The Proximate Area 15 properties are existing developed areas with some vacant lots that use on-site wastewater systems. The Wilson Sewer District sewer mains are currently in place west of the parcels. Groundwater protection delineation covers most of the parcels. Wastewater flow is expected to increase within 10 years due to the presence of the Town sewer main and groundwater protection potential. An existing flow of 30% is applied beginning in 2026 since some of this area is now using the Wilson Sewer District and Town wastewater services. See Table 2-40 for a summary of projections.

Area Characteristics

- Zoning: 2 R-1, 5 R-2, 24 R-3
- ARU: 2 ARUs for R-1 and R-2, 1 ARU for R-3, 50% build out assumed.

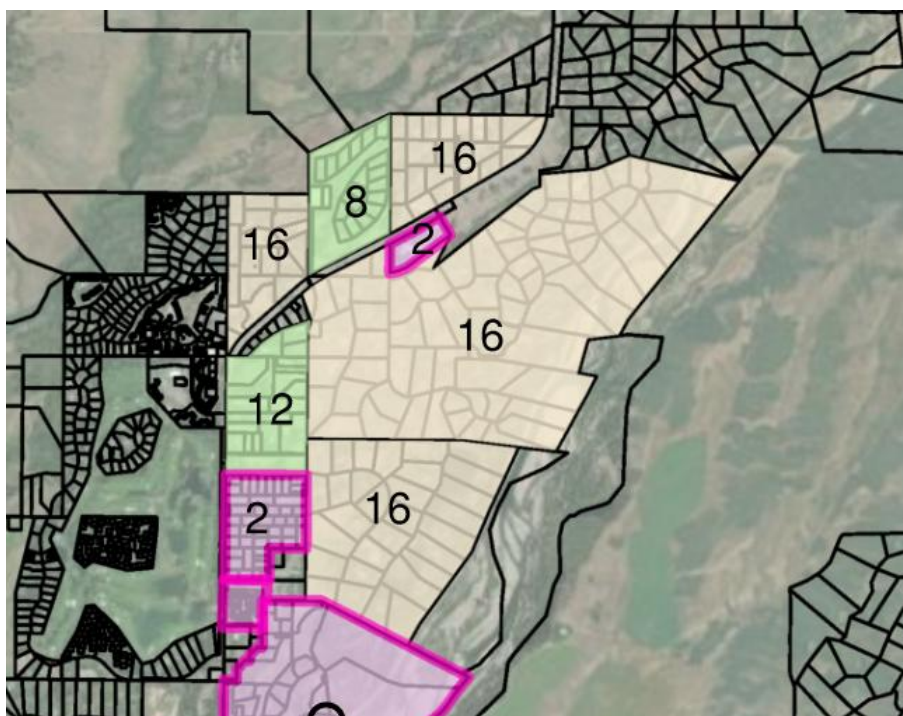
Table 2-40 – Proximate Area 15

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	3,000	6,000	7,500	9,000	12,000	15,000
Build Out (%)	20	40	50	80	80	100

2.5.16 Proximate Area 16

The Proximate 16 area includes a block of parcels north of Highway 22 and either side of Highway 390. There is an existing Wilson Sewer District service area near the area. The area is shown on Figure 2-44 in tan and marked "16".

Figure 2-44 – Proximate Area 16



The Proximate Area 16 properties are existing developed areas with some vacant lots that use on-site wastewater systems. The Wilson Sewer District sewer mains are currently in place near the parcels. Groundwater protection delineation covers about half of the parcels. Wastewater flows may increase within 10 years due to the presence of the Town sewer main and groundwater protection potential. See Table 2-41 for a summary of projections.

Area Characteristics

- Zoning: 129 R-2, 7 NR-1
- ARU: 2 ARUs for R-2, 1 ARU for NR-1, 50% build out assumed.

Table 2-41 – Proximate Area 16

WASTEWATER FLOWS						
Year	2026	2031	2036	2041	2046	2080
Peak Day Flow (gpd)	0	18,360	30,600	42,840	48,960	61,200
Build Out (%)	0	30	50	70	80	100

2.6 Conclusion

Information from past predictive efforts for wastewater generation was evaluated as a starting point for this analysis. The *2021 Capacity Study* and *WQMP* assumed that all properties would ultimately be developed or redeveloped to their highest density allowed for their respective zoning. This analysis continued using the highest density approach for parcels within the Town boundary, but individually assessed properties outside of the Town boundary on Priority Areas and Proximate Areas to estimate wastewater flows and timeframes. Increased wastewater flows will come primarily from Town growth including bonus units, development of County properties as allowed by zoning regulation, infill, and the addition of allowable ARUs on existing properties.

The Town of Jackson WWTP has a current capacity of 5.0 MGD on a peak month or maximum month design basis, as discussed further in the following chapters. All wastewater generation values in Chapter 2 are conservative by a flow factor of 1.2 using the definition of peak day of the peak month presented in the *2021 Capacity Study* and *WQMP*. The combination of the Town of Jackson, Priority Areas, and Proximate Areas are estimated to reach 4.0 MGD by 2036 or 4.6 MGD by 2046, which includes the peak day flow factor of 1.2. The wastewater generation spreadsheet, with the assumptions presented, predicts a peak day flow of 6.3 MGD for the year 2080. As developments and wastewater flows become reality over the coming years, the Town can use the wastewater generation spreadsheet calculation tool that supports this analysis to verify that the timeline, flows, and flow factor are tracking with the estimated values and/or adjust to observed conditions.

CHAPTER 3

WWTP CAPACITY AND CONDITION

3.1 WWTP Treatment Process Overview

The existing wastewater treatment plant (WWTP) is an aerated 10-cell lagoon system with headworks screening and ultraviolet disinfection. Influent passes through a 6 mm step screen and then enters a raw water wet well. Screenings are compacted and disposed of at a landfill. Influent is pumped to a flow splitting structure where influent is evenly split between the two primary cells. Discharge from the two parallel primary cells is then combined as it flows by gravity through the subsequent 8 cells. All cells but the final settling cell are aerated.

After the final settling cell, all lagoon effluent enters the intermediate pump station from which wastewater is pumped to UV disinfection. Disinfected effluent is sampled for compliance with WY DEQ permit requirements. The fully treated effluent then enters a multi-pond, unlined wetland system, where further passive biological treatment occurs prior to discharge into the Snake River. While the wetland effluent has been shown to be very low for all sampled constituents including nutrients, it does not count toward the treatment performance of the WWTP. Figure 3-1 shows the WWTP and the existing flow path.

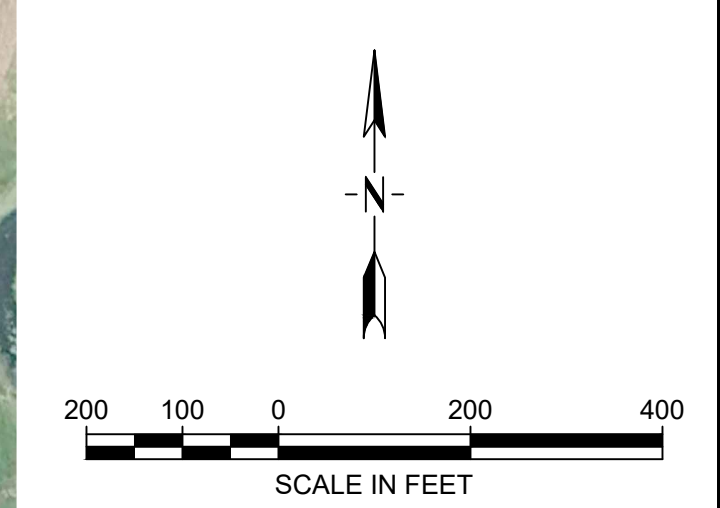
3.2 Existing Facility Capacity

The Town of Jackson completed a water and sewer system evaluation in 2021 (*2021 Capacity Evaluation*). This report presented a WWTP capacity analysis that was consulted in preparation of this chapter. In addition, recent influent sampling data for biochemical oxygen demand (BOD) and flow information presented in Chapter 2 were evaluated to further refine the existing facility's available capacity.

Per the Wyoming Administrative Rules, WY DEQ Chapter 11, evaluating the facility capacity must consider hydraulic performance and organic loading. For this evaluation, the Chapter 11 standards were interpreted to apply to peak month conditions. The Jackson facility is an aerated partially-mixed lagoon that must meet the following standards:

- **Hydraulic Capacity:** Hydraulic retention time (HRT) of the primary cell must be at least 7 days, and total HRT throughout the lagoons must be no less than 30 days (at peak month flows).
- **Organic Treatment Capacity:** Biochemical oxygen demand (BOD) loading must not exceed 2 pounds of BOD/day/1,000 cubic feet of lagoon volume (at peak month loading).

Hydraulic Capacity. Based on the total available lagoon volume of all ten treatment cells, not accounting for stored sludge, and a required HRT of 30 days, the facility's overall peak monthly average hydraulic capacity is 5.1 million gallons per day (mgd). Individual cell volumes and HRTs are shown in Table 3-1.



LEGEND:
→ NORMAL PROCESS FLOW



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DATE: 05/2026

JACKSON	TOWN OF JACKSON / TETON COUNTY WASTEWATER CAPACITY ANALYSIS	WYOMING	PROJECT NO. 5439.001
WWTP SITE PLAN AND FLOW DIAGRAM			FIGURE NUMBER FIG. 3-1

V:\5439\001- WW Capacity Analysis\ACA\Exhibits\Fig 3-1.dwg

Plotted by jerry a. chambers on May/15/2026

The two large primary cells are operated in parallel. Flow is split evenly between the cells and combined again when entering Cell 3A. This means that each primary cell will satisfy the 7-day HRT requirement for influent flows up to 5 mgd. When considering the combined Cell 1 and Cell 2 HRT, the resulting total capacity of 10 mgd exceeds the overall capacity of 5.1 mgd. Therefore, the overall 30-day HRT requirement is the limiting condition. The maximum allowable monthly average flow (peak month) is 5.0 mgd per the WY0021458 WYPDES permit.

Organic Treatment Capacity. The organic loading requirement does not distinguish between aerated and non-aerated cells. Since organics removal primarily occurs in aerated cells, the volume of the nine aerated cells was used to calculate the organics treatment capacity. The resulting allowable BOD loading is 37,431 lb/d. Given the allowable BOD loading stated above, the treatment capacity for the annual average load is 14.4 mgd, and the treatment capacity for the peak month load is 8.3 mgd.

The treatment capacities listed above are to meet the WY DEQ design standards. However, the facility must also meet Jackson's discharge permit requirements. Treatment modeling performed by Vista Engineering and presented in the *2021 Capacity Evaluation* indicates that the actual peak month treatment capacity is between 5.0 and less than 6.5 mgd, the exact value is not known. The 2021 Capacity Evaluation was based on actual treatment performance of each lagoon cell. For practical purposes, the current overall WWTP capacity is considered to be 5.0 mgd.

Table 3-1 – Lagoon Cell Volumes and Retention Times

Lagoon Cell	Cell Volume (Million Gallons)	Retention Time at 5.1 mgd (days)
Primary Cells		
Cell 1	35	13.7 ¹
Cell 2	36	14.1 ¹
Secondary Cells		
Cell 3A	12	2.4
Cell 3B1	16	3.1
Cell 3B2	12	2.4
Cell 4A	6	1.2
Cell 4B	7	1.4
Cell 4C	9	1.8
Cell 4D	7	1.4
Tertiary Cells		
Cell 5	16	3.1
All Cells	156²	30.4³
1. Value based on half of the total influent (i.e. 2.55 mgd) since flow is split between Cell 1 and Cell 2. 2. Includes volume of Cell 1 and Cell 2. 3. Determined using only primary Cell 1 retention time, since this is more restrictive than the Cell 1 retention time.		

3.3 Future Capacity Needs

Chapter 2 presents the peak day of peak month flows. Typically, wastewater facilities are designed to treat peak month flow scenarios. As described above, the WY DEQ Chapter 11 design standards are also interpreted based on peak month condition. Similarly, the permitted flow of 5.0 mgd is based on the peak month flow condition. Therefore, for future planning efforts, the flows from Chapter 2 are converted to a peak month flow based on the 1.2 peaking factor from the *WQMP*. Table 3-2 summarizes the peak day and peak month flows, as well as the estimated years for when capacity milestones are reached.

Generally, planning for upgrades should start when influent flows or loads approach about 80 percent of the stated capacity value. For the current facility, the most limiting capacity is the hydraulic capacity at 5.1 mgd, therefore, planning should initiate when peak month influent flows reach 4.1 mgd. Based on the projected flows, it is estimated that hydraulic capacity will be met in 2077 and planning for upgrades should start in 2052. Influent data should be reviewed frequently to determine if influent flows are significantly different than the estimated planning values. If the facility experiences larger than expected flows and reaches 80 percent of peak month capacity earlier than forecasted, planning for capacity expansion may be initiated sooner.

Table 3-2 – Projected WWTP Flows¹

Year	Peak Day Flow ² (mgd)	Peak Month Flow ² (mgd)	Capacity Milestones
2026	3.07	2.56	
2031	3.52	2.94	
2036	3.87	3.23	
2041	4.21	3.51	
2046	4.61	3.84	End of 20-year planning period
2052	4.92	4.10	80% of hydraulic capacity; initiate planning for facility upgrades
2077	6.12	5.10	Hydraulic capacity met; organic treatment capacity was not evaluated as part of this analysis and may be lower
2080	6.24	5.20	Treatment capacity evaluation recommended to determine remaining treatment capacity without additional upgrades.
1. The listed flows include wastewater from the Town of Jackson, Priority Areas, and Proximate Areas as presented in Chapter 2.			
2. Peak day flow estimates based on Chapter 2 assumptions.			

3.4 Treatment Performance

3.4.1 Permitted Constituents

Currently, the WWTP permit (WY0021458) has effluent limits for 5-day carbonaceous biochemical oxygen demand (cBOD₅), total suspended solids (TSS); *E.coli*; total chlorine, oil and grease, and pH; the complete permit is provided in Appendix C. According to the reported discharge monitoring report (DMR) data, the facility meets all the permit limits and produces effluent with constituent values far below the permitted limits. Although the facility is required to report values for ammonia, total nitrogen, total phosphorus, and other constituents, there are

no limits associated with these constituents at this time. Therefore, at the current flows, the facility is performing very well. If effluent BOD and TSS concentrations start increasing significantly, a reevaluation of the treatment threshold is recommended.

3.4.2 Ammonia

The existing facility successfully removes ammonia to very low concentrations in Cells 1 and 2 during the warmer summer months. However, lagoon systems are not able to provide the same ammonia removal at cold temperatures and winter effluent is high in ammonia. It is possible that future permits may enact a year-round ammonia limit. The current permit indicates an end-of-pipe ammonia concentration of 28.2 mg/L from October through April. This concentration is currently evaluated at the entry to the Snake River and not at the permitted WWTP outfall. This value is not exceeded at the entry to the Snake River (i.e. after treatment through the wetlands), but it is exceeded at the WWTP outfall location upstream of the wetlands. Should the analysis method for the ammonia limit change to consider the effluent ammonia concentration at the permitted outfall location, the facility may see an ammonia permit limit in the future. This is an important consideration when evaluating all possible scenarios for treatment requirements at the WWTP.

This report examined does not provide conceptual design or exact sizing for future ammonia removal facilities. Research for the report did address order of magnitude sizing for design flows of 4.0 mgd and 6.5 mgd to help determine the most likely location for the facilities.

3.4.3 Nutrients (Nitrogen and Phosphorus)

The Snake River is not on the WY TMDL schedule, and there is no existing TMDL for nutrients for the Snake River. There is no indication that the Snake River will be assessed in the near future, and there is no 303(d) listing for impairments for nutrients. Given typical time frames for assessments and TMDL development, it is unlikely that TMDL-driven permit changes will occur in the near term. Even if WY DEQ begins to develop a nutrient permitting framework, the absence of a nutrient impairment listing for the Snake River would suggest that the Jackson permit would not be high on the priority list for nutrient limits.

However, permit limits are not the only driver for improvements to wastewater treatment. Various local stakeholders have expressed interest in nutrient removal to protect the Snake River from possible eutrophication. Currently, the wetlands are providing excellent nutrient removal. However, this type of removal relies on natural processes and can be variable. It is possible that as influent loads increase, the natural wetland treatment will not be sufficient to produce the low concentrations of nitrogen and phosphorus it currently does. Therefore, it is possible that some form of nutrient removal treatment may be needed as part of the WWTP in the long term.

3.5 Facility Condition

The overall facility condition is considered good to fair. Wastewater treatment plant management and operators are proactive in scheduling preventive maintenance and keep equipment in good working order. Small equipment is replaced when needed as part of a general maintenance plan. However, larger investments require careful planning and funding considerations. At the time of this report, plant staff have reported that much of the equipment,

including influent screening, ultraviolet disinfection, and pumps, is in good working order and does not require foreseeable upgrades for condition. Larger investments identified by plant staff include aeration equipment and sludge removal in Cells 1, 2, and 3A. Due to aeration equipment age-related maintenance needs and sludge accumulation, the condition for the aeration equipment and overall available treatment volume is considered fair.

3.5.1 Aeration and Mixing Equipment

The aeration and mixing equipment in Cells 1, 2, and 3A is 15 to 16 years old and will increasingly require maintenance and repair. Therefore, replacement is considered important to maintain current treatment performance.

The existing aeration equipment consists of floating, blower assisted aspirating aerators and low-energy mixers. The aerators inject the necessary air into the water, and the mixers encourage dispersion of the aerated water to support uniform aeration throughout the cell. The aerators are Air O2 Triton 50-hp aspirating mechanical aerators with a 7.5 hp regenerative blower. The mixers are Medora Grid Bee GF1000 mixers. There are 7 aerators and 6 mixers in each Cell 1 and Cell 2. Cell 3A has 4 aerators and no mixers. The cells are equipped with dissolved oxygen probes, and air to the cells is manually controlled by operators.

The majority of the aerators and mixers are not used during months when the water surface could freeze up. This means that for about 4 months of every year, very little oxygen is introduced to the primary cells. The size of the cells still facilitates some cBOD removal; however, the majority of aerobic treatment is provided by Cells 4A through 4D, where static tube diffusers provide air year-round. While ammonia removal stalls during the winter, organics removal is successfully accomplished with this mode of operation.

The surface aerators do not provide uniform mixing and the low-energy mixers do not provide sufficient energy to keep sludge suspended throughout the cell. This leads to uneven sludge settling with no sludge at all immediately in front of the aerators and deep sludge mounds in between units and in localized dead zones where little to no mixing occurs. Therefore, simply replacing the existing equipment would not resolve dead zones and uneven sludge settling. A larger number of units, and/or a different configuration would be needed to distribute solids more evenly.

3.5.2 Cell Liners

According to the 1979 record drawings, Cells 1, 2 and 3A have a bentonite clay liner. The liner thicknesses shown in the drawings vary from 6 to 4 inches. Although there are no signs of deterioration, installation of additional liner is considered prudent and convenient if the cells are to be drained and sludge removed.

3.5.3 Sludge Removal

Sludge has not been removed from the first three lagoon cells since they were constructed in 1979. Lagoon capacity decreases when sludge layers get too deep, and the sludge can reintroduce contaminants into the water, reducing both hydraulic and treatment capacities of the lagoon. Typical design allows for 2 – 3 feet of sludge. The excess treatment capacity in the

lagoon system for the past and current flows has allowed for continuous successful treatment despite significant sludge accumulation in the primary cells.

According to the H&S Environmental 2021 Sludge Profile Report, the average sludge blanket in Cells 1, 2, and 3A is 4.09, 2.83 ft, and 3.35 ft, respectively. Therefore, sludge removal is a maintenance item that should be addressed to maintain hydraulic capacity and treatment performance. Table 3-3 summarizes the sludge volumes from the H&S Environmental Sludge Report and compares the ideal retention time (without sludge) to the actual retention time.

Table 3-3 – Impact of Sludge Volume on Hydraulic Retention Time

Cell	Sludge Depth (ft)	Cell Volume Occupied by Sludge (%)	Ideal Retention Time at 5.1 mgd (days)	Actual Retention Time at 5.1 mgd (days)
Cell 1	4.09	38.1%	13.7	9.4
Cell 2	2.83	19 %	14.1	11.4
Cell 3A	3.35	20 %	2.4	1.9

The H&S report did not analyze other cells. Operators have reported negligible sludge accumulation in Cells 3B1 through 5 and will monitor the sludge accumulation in those cells. As mentioned above, if effluent concentrations for TSS and BOD start increasing significantly, sludge removal should be performed before further process improvements. This will allow the true WWTP performance capacity to be evaluated without feedback of BOD, ammonia or other constituents from sludge, which could exert a significant oxygen demand, taking away available capacity from treating incoming wastewater.

CHAPTER 4

WWTP ALTERNATIVES AND RECOMMENDATIONS

4.1 Planning Period

Previous reports have offered planning periods of as long as 50 years. Development of improvements alternatives took a standard preliminary engineering approach to the planning period. While a look at the flow forecast through 2080 is provided in Chapter 2, the focus in this chapter is on the next 20 years to develop recommendations that are practical for today's operations and near-term planning. Factors affecting the choice of the length of the planning period included the following:

- Ability to see into the future and project future flows to the WWTP
 - Chapter 2 presents estimates for the rate and size of influent flow increases. Even just looking 10 years out, the chapter illustrates how difficult it is to predict when growth will occur where and at what rate. This challenge increases if a longer planning horizon is used. The Excel tool provided with Chapter 2 will allow Town of Jackson public works to adjust forecasts based on actual growth over the years. Adjusted values may change the timeline presented in this chapter.
- Equipment and process innovations
 - Research resulting in equipment and process innovations are always ongoing. Planning too far into the future and not allowing for flexibility along the way may preclude or overlook making use of innovative solutions that may have better constructability, reduce energy consumption, change processes or configurations, or increase effluent quality.
- Typical wastewater treatment equipment design life
 - Most wastewater treatment equipment has a design life of about 20 years. Planning for major upgrades on a time scale exceeding 20 years may not provide a benefit because decisions regarding equipment replacement must be made on shorter time scales.
- Current improvement needs
 - Current improvement needs must be approached with caution to make sure future upgrades will be supported. The long-term outlook must be thorough enough to reveal later needs, so that short-term improvements can be geared towards long-term solutions. More detail on this planning strategy is provided in the sections below.

Upon consideration of these points, the planning period was defined as follows:

- Near-Term: 0 to 9 years
- Long-Term: 10-20 years with a cursory look beyond 20 years

4.2 Future Needs

The following alternatives were developed to address the equipment condition and facility capacity needs within the planning period. A summary of those needs is provided below:

- Near-Term Needs
 1. Aeration equipment upgrades
 2. Sludge removal
 3. Clay liner replacement in Cells 1, 2, 3A
- Long-Term Needs
 - Capacity expansion to 6.5 mgd
 - Potential year-round ammonia removal
 - Potential nutrient removal

4.3 Alternative Development

Alternative development took a reverse approach. Potential solutions to long-term needs were explored first to make sure that planning for near-term needs would be compatible with potential future upgrades. The identified long-term needs of year-round ammonia removal and nutrient removal were explored conceptually to identify likely locations and size of facilities and upstream treatment requirements.

4.4 Long-Term Alternatives

4.4.1 Undeveloped Alternatives

Treating to Drinking Water Quality. The highest level of currently available treatment technology is reverse osmosis (RO). RO involves high-energy pumping to draw contaminated water through membranes with such small pore sizes that even salt is left behind. RO would follow a nutrient removal activated sludge plant that can deliver high quality effluent to the RO system to keep reject water (brine) to a minimum. Processing and disposal of the brine is generally a limiting factor for RO treatment due to the large volume of water generated.

This type of treatment creates drinking water quality effluent but comes at a very high price for capital costs, O&M costs, and carbon footprint. The US Environmental Protection Agency (EPA) has published guidance that advises against the use of RO for wastewater treatment unless direct potable reuse is desired because the cost to local economies and the environmental cost of RO is higher than the benefit of having highly treated effluent.

The capital costs for RO treatment for the flows seen in Jackson may approach \$100,000,000, with O&M costs in the hundreds of thousands per year, primarily for power, chemicals, and labor. These costs would unduly burden rate payers and be counter to efforts to provide affordable housing. Likewise, businesses would be burdened by higher sewer rates, which may discourage smaller businesses from starting up or staying in Jackson.

For these reasons, treating the Jackson area wastewater to drinking water quality was not considered in this report.

Activated Sludge Biological Nutrient Removal Plant. Activated sludge plants are capable of consistently producing high quality effluent and have been tried and proven to work well, particularly when ammonia and nutrient removal are desired or required. Activated sludge plants are attractive when the footprint available for a treatment plant is limited and land purchase is not possible or is cost prohibitive.

However, activated sludge plants operate with a much smaller volume than lagoons. This requires constant process monitoring by operators because changes in influent can quickly affect treatment performance. Should influent contain substances toxic to the bacteria providing the biological treatment, they could upset the entire process, requiring weeks or months to re-establish treatment capabilities. A lagoon system provides a natural buffer because of its large size and is often able to handle these types of upsets with only minor changes in effluent quality. The Town of Jackson has experience with two events of this type.

In seasonal communities like Jackson, where tourism can cause large differences in flow during different seasons, activated sludge plants often require that multiple treatment trains be available to be taken in and out of service depending on seasonal influent flow, which adds to the complexity of the operation.

Because of the complexities noted above, activated sludge plants are designed to provide very good control over the process. This control is facilitated by equipment, sensors, and controls that require daily operator attention and regular maintenance and replacement, increasing operational complexity and costs significantly over current operations. A typical activated sludge biological nutrient removal plant capable of processing 5.0 mgd would be staffed with six to eight operators to allow for shift and weekend coverage and have no less than three operators on site during daytime hours.

Activated sludge plants often require chemical addition and associated equipment to achieve desired effluent nutrient concentrations. Where other avenues of nutrient removal are not available, this is acceptable. However, Jackson has data to prove that the utilized wetlands are capable of reducing nutrients to very low levels. Constructed wetlands that could be located in the footprint of Cells 4 and 5 should be explored in detail for nutrient removal before deciding to complete an upgrade to an activated sludge plant for nutrient removal.

And finally, the construction and O&M costs for activated sludge plants tend to be high, both in dollars and carbon footprint. Materials and energy use is much higher than that of a lagoon system, even when considering post-lagoon treatment. These costs would be borne by rate payers and the environment. Therefore, an activated sludge plant was not included in the analysis in this report.

4.4.2 Capacity Expansion to 6.5 mgd

Projections presented in Chapters 2 and 3 suggest that planning for a capacity expansion is not needed until about 2052, or in 25 years. It is difficult to predict the best method for expansion

this far into the future because it is not known whether ammonia removal or nutrient removal will be desired or required then. Assuming that both will need to be provided, a capacity expansion would most likely involve small-footprint, add-on systems that could follow lagoon treatment after the first three to five treatment cells. If ammonia removal or nutrient removal are not desired or required at that time, a look at converting a portion of Cell 5 to a small-footprint facility that can provide additional capacity may be warranted. For this report it was assumed that there will be a need for ammonia and nutrient removal.

4.4.3 Year-Round Ammonia Removal

If new permits include year-round ammonia limits, enhanced treatment will be required to reduce effluent ammonia concentrations during the winter. This can be accomplished by installation of an aerated attached growth reactor in the footprint of Cell 3A or Cell 3B1. For this report, installation in Cell 3B1 was assumed, to preserve Cell 3A for secondary treatment. If this alternative were chosen, a more in-depth analysis would be needed in the future to identify the optimal location for the ammonia removal system.

Influent to the aerated attached growth reactor must be low in BOD, which means that the primary cells plus Cell 3A must be able to effectively reduce BOD at all planned flow and load conditions. This is important when planning for near-term upgrades and will be considered below when describing near-term alternatives.

As discussed in Chapter 3, Wyoming Administrative Rules DEQ Chapter 11 provide design standards for hydraulic and organic loading. With placement of the ammonia removal facility into Cell 3B1, only Cells 1, 2, and 3A would be available for lagoon treatment, providing a reduced volume to satisfy the loading design standards. However, based on a conversation with Brad Ellis at WY DEQ, a variance from these standards can be applied for with the WY DEQ with the addition of enhanced ammonia removal or other added treatment step following the lagoon treatment. The application will need to show that the complete facility will be able to comply with permit limits. In addition, aeration and mixing in Cells 1 and/or 2 may be adjusted to provide near-completely mixed conditions, which will greatly enhance the primary cells' overall treatment capacity and their ammonia removal capabilities prior to discharge to an added process.

As data becomes available for the upgraded Cells 1, 2, and 3A, a new capacity analysis should assess their actual treatment capacity. With adequate aeration and mixing and attentive operation, it is expected that these cells will have a higher treatment capacity than they currently do, even with a partial-mix regime. Should this not be the case, aerated attached growth reactors can be used to provide polishing for BOD removal. Larger reactors would facilitate BOD removal upstream of ammonia removal.

There are several types of aerated attached growth reactors available:

Moving Bed BioReactors or MBBRs use concrete tanks with suspended media with a large surface area to host the biology needed to provide ammonia removal. Screens keep the media and attached biomass in the system, so the biomass remains available year-round. These

systems have a small footprint, so they can easily fit within a portion of Cell 3B1 or Cell B2. The floating media has typically been plastic; however, at least one manufacturer has begun offering media made from natural materials to prevent the creation of microplastics by the treatment process. By the time this system may be designed and installed, additional manufacturers may be offering organic media.

By locating the MBBR in Cell 3B1, settling could be provided by Cell 3B2 and the addition of new piping from Cell 3B2 could allow for gravity flow to UV disinfection. The continued use of Cells 4 and 5 would likely further deteriorate the effluent water quality, so having an option to route flow to disinfection sooner is important to achieve good effluent quality. Eliminating pump station operation would also save on energy and maintenance costs.

The option for routing flow through the remaining cells could be maintained, including aeration, if operators decide it is necessary. Since Cells 4 and 5 are lined with a geosynthetic clay liner, they cannot be dried out. Therefore, to maintain liner integrity, the cells would continue to hold water and cycle air on and off at very low rates to encourage aerobic processes and prevent odors.

In summary, advantages of the MBBR system includes a small footprint that would allow for installation of reactors serving flows up to 6.5 mgd in Cell 3B2, and availability of natural media that would not create microplastics. Concrete construction has a high carbon footprint, which may be perceived as a disadvantage of this option.

Submerged Attached Growth Reactors or SAGRs use an aerated buried rock filter to host the ammonia removing bacteria and could also be described as aerated horizontal flow treatment wetlands. They consist of a gravel bed, piping, and aeration equipment. The gravel provides a lot of surface area for ammonia removal bacteria to grow on. Blowers supply air to the gravel bed so that fully aerobic conditions are maintained throughout the reactor to favor conditions for ammonia removal. It is important to provide gravel that meets the manufacturer's specifications. Fine or unwashed gravel will not have the proper hydraulic properties needed for treatment and can result in clogging. This gravel is not provided by the manufacturer. The quantity of gravel required for a system that can treat 4.0 to 6.5 mgd is very large. Sourcing of the gravel must be examined to evaluate availability and cost for importing these large quantities.

These systems are sized to achieve an effluent ammonia concentration of 1.0 mg/L year-round. Consequently, the size of the reactors is heavily impacted by ambient winter temperature and flow rate. The SAGR manufacturer was contacted on behalf of the Town of Jackson to estimate the size of the reactor for 4.0 mgd flow. It was determined that the reactor would take up the majority of Cells 4A, 4B, 4C, 4D and 5. Additional area for a larger system would be needed if expanding the facility to 6.5 mgd. This footprint is significantly larger than that of an MBBR; however, the natural rock media will not contribute to the microplastics within the wastewater. Unlike the MBBR, this option would require continued use of the pump station to the UV disinfection system.

The manufacturer does not require any settling after the SAGR system to meet stated effluent quality, and the SAGR manufacturer recommends direct discharge to disinfection from the SAGR. Retention in a settling cell would likely deteriorate effluent water quality.

In summary, the benefits of SAGR systems are that they use all natural media for treatment with the addition of air. This aligns with the current treatment philosophy, has a proven track record for cold weather nitrification with installations in northern US states and Canada, and requires relatively low maintenance and operational oversight. Downsides include potentially costly import of large quantities of the correct type of gravel and a large footprint that would likely exceed the footprint of the existing Cells 4 and 5 when expanded to 6.5 mgd.

4.4.4 Nutrient Removal

Nutrient removal can be achieved at lagoon treatment facilities using a combination of biological and chemical removal. For nitrogen removal, the above-described ammonia removal system is an important first step followed by nitrate removal. While lagoon systems provide some nitrate removal, it is uncontrolled and may fluctuate widely throughout the year. Tertiary removal can provide reliable polishing but requires the addition of an organic food source for the bacteria responsible for turning nitrate into nitrogen gas. This source may be a portion of finely screened influent, screened brewery waste, or a synthetic source, such as glycol.

For phosphorus, chemical addition would be needed to precipitate the phosphorus as a non-reactive solid and remove it from the treated water through subsequent filtration.

Both nitrogen and phosphorus removal can be accomplished in sand filters specifically designed for this purpose. It is expected that the footprint of Cell 3B1 will be sufficient to accommodate the ammonia removal system using MBBR reactors and tertiary nutrient removal systems for all projected influent flows and loads.

4.4.5 Conclusions

The projected flows in Chapter 2, capacity requirements in Chapter 3, and long-term options described above lead to the following conclusions:

- The existing facility has sufficient capacity to treat organic waste through the 20-year planning period, unless ammonia removal is desired or required.
- For all considered future treatment add-ons or capacity expansion, at least the first three lagoon cells would be retained in service.
- The addition of ammonia removal will truncate lagoon treatment, limiting the available hydraulic and organic treatment capacity within the lagoon basins to 4.0 mgd when evaluated based on Chapter 11 design standards.
- Changes to mixing and aeration in Cells 1, 2, and 3A can increase their overall organic treatment capacity. While partially mixed cells are sufficient for treatment up to 4.0 mgd, installation of additional aeration and mixing equipment to create completely mixed conditions in Cell 1 can expand overall treatment capacity to 6.5 mgd when used in combination with MBBR or SAGR treatment.

- WY DEQ can grant a variance from the design standards for hydraulic and organic loading if the lagoon cells are followed by additional (non-lagoon) treatment and/or if treatment calculations or analysis can show that the system is capable of treating higher loads or flows.
- Effective BOD removal upstream of ammonia treatment minimizes sizing of the ammonia removal facilities, and aeration to Cells 1, 2, and 3A will be required year-round. If the town continues use of surface aerators, this will require operating them throughout the winter (unlike the current operational method) to meet BOD removal requirements before ammonia removal treatment. This could lead to concerns with freezing, equipment maintenance, and inadequate BOD removal.
- If continued availability of Cells 4 and 5 is desired, a SAGR system would not be recommended as it would take up that very space. MBBR systems would fit within the footprint of Cell 3B1 with settling in 3B1, leaving Cells 4 and 5 for emergency service.

4.4.6 Long-Term Planning Implications for Near-Term Upgrades

In addition to the above conclusions, operators may want to maintain Cells 4 through 5 in service as a buffer to manage potential upsets. They are also planning on upgrading their system one cell at a time. Therefore, implications for near-term improvements included the following:

- The initial aeration and mixing design must address noted deficiencies but does not need to increase treatment capacity in Cells 1, 2, and 3A. Planning for aeration system upgrades considered a peak month design flow of 4.0 mgd, which would provide capacity through the next 20 years.
- The aeration design for the first three cells must be flexible to allow for easily adding aeration capacity at a later time and expanding the system to a treatment capacity of 6.5 mgd (along with addition of MBBR or SAGR treatment).
- The aeration system must be able to operate year-round in freezing conditions.
- Near-term upgrades could include piping design changes that would allow bypassing of Cells 4A through D and Cell 5. Alternatively, upgrades may include blower or aeration controls that allow for intermittent aeration in these cells to test for system performance with less air at the downstream end of the system and facilitate potential energy savings.
- Plan for phased upgrades.

4.5 Considerations Applicable to All Near-Term Alternatives

The above aeration system capacity and flexibility implications were included in the various aeration system options described below. Additional information applicable to the near-term alternatives are as follows:

4.5.1 Energy Efficiency, Cells 4 and 5, and Aeration System Type

In general, the facility operates very well with a lot of flexibility given the number of aerated cells. However, the large number of cells also requires large amounts of air/energy. If the facility had the ability to reduce the number of operating cells, this would reduce energy costs. As mentioned above, site elevations would allow water to gravity flow from the effluent of Cell 3B2

to UV disinfection if a new pipe was installed. This would allow for taking the five subsequent cells out of service, reducing blower operations and removing the pump station from routine service.

This mode of operation would require an aeration system in Cells 1 through 3B1 that can operate year-round without freezing concerns and provides the oxygen transfer efficiency needed to meet year-round oxygen demand in these cells. Since the existing surface aerator are taken out of service in the winter to avoid freezing and other cold-weather operational concerns, they are not the first choice, and use of a fine-bubble aeration system would be recommended. Cell 3B2 would be used for settling.

The out-of-service cells could be maintained for emergency service. They would continue to hold water, and only minimal air or intermittent aeration would be needed to prevent septic conditions and odor concerns. Blower controls could be upgraded to intermittent aeration. Existing piping and valves would need to be maintained/exercised by operators to keep them in working order, and available when needed.

If discharge after Cell 3B2 is desired, additional capacity calculations for Cells 1 through 3B1 must be performed to confirm that the available capacity in these cells will be sufficient through the next 20 years. A cost for installation of the new piping was not developed for this report.

4.5.2 Cost Estimating

Opinions of Probable Construction Cost (OPCC) were prepared for alternatives presented in this report. The OPCCs presented are Class 4 estimates representative of a planning-level project phase including schematic design and concept studies. The classification corresponds to the AACE International definition (AACE International. 56R-08, Cost Estimate Classification System – As Applied in Engineering, Procurement, and Construction for the Building and General Construction Industries. 2020.). Class 4 estimates are expected to have an accuracy of -20 percent to +30 percent. This is reflected in the size of the construction contingency applied to the estimates in this report, which use a 30 percent contingency.

Construction costs for each alternative include materials, labor, and other construction costs as listed for each alternative described below. All alternatives include a 20-percent line item for unlisted items. This line item covers details not included at this level of planning.

The OPCC also includes nonconstruction costs:

- Engineering: 20 percent of construction costs. This percentage is routinely used to estimate fees for both design and construction services; however, the high lodging costs in Jackson could result in higher than usual costs for the resident project representative (RPR) of the engineer and drive up this percentage.
- Administration: 5 percent of construction cost.

Total project costs are the sum of construction and nonconstruction costs.

4.6 Near-Term Need 1: Aeration Equipment Upgrades

To address the need for improved aeration equipment, three alternatives were developed with input from plant staff. The evaluated alternatives are:

- Alternative 1A – Replace with Like Equipment: The existing surface aerators and mixers would be replaced with newer models of the same type.
- Alternative 1B – Diffused Aeration Equipment: The existing equipment would be replaced with diffused aeration equipment.

In addition, some common considerations are offered below.

4.6.1 Alternative 1A – Replace with Like Equipment

Description

As discussed in Chapter 3, the existing aeration and mixing equipment results in very uneven sludge settling. In addition, operation during the winter is not practical due to freezing and equipment access limitations.

Aside from these concerns, the existing equipment provides adequate treatment when used with the remaining treatment cells. This is shown by the track record of easily meeting permit requirements for cBOD and TSS. The WWTP operators are familiar with the operations and maintenance of the equipment and find these requirements to be reasonable.

As mentioned above, the existing aeration equipment consists of 18 Triton Aire O2 aerators in Cells 1, 2, and 3A. Triton aerators provide “fine bubble” aeration performance that can reach a depth of up to 33 feet. The new upgraded Aire-O2 model 2.0 would allow the aerators to be installed at variable vertical angles to optimize for the actual lagoon depth. By allowing for more flexibility in mixing orientation, dead zones and associated sludge mounding could be reduced. Additional units could be installed later to increase aeration for higher loads or provide a more intense mixing regime, which can help with treatment capacity.

The mixers would be powered by 40-hp motors and air would be provided by 10 hp regenerative blowers for each unit. The new model would allow for independent control of mixing and aeration functions, as there may be times when less air is needed, but mixing should be maintained to reduce dead zones. Automation could be provided to allow operators to turn air on and off while the mixer keeps operating. Automation would avoid the need for physically accessing each unit to adjust the blower. Each aerator can produce 425 scfm.

In addition, the arrangement of the aerators in the basin would be examined. Aeration Industries may have suggestions that could be explored during design. For the purpose of this report, it was assumed that the aerators would be arranged similarly to oxidation ditch aerators to induce and maintain flow in a circular fashion around the central baffle in Cell 1. Aerators in Cell 2 and Cell 3A would be oriented to encourage dispersion and directional flow per the manufacturer’s recommendations.

The existing low-energy mixers are GridBee 10000 mixers. The mixer intake level is adjustable to avoid disturbing the facultative and sludge layers but reach low enough to effectively disperse oxygenated water outside of the aerators' mixing influence. The GridBee mixers distribute water horizontally and have a larger radius of influence than the single propeller on the aerators. The gentle mixing provided by the GridBee mixers uses low-hp motors that are more energy efficient than the Triton mixers. The low-energy mixing is limited in its ability to keep solids in suspension and does not impart directional mixing, encouraging the counter-clockwise motion of the flow around the center baffle in Cell 1.

Based on the recommendations of the aerator and mixer manufacturers, the following equipment is recommended in each cell.

- Cell 1
 - 6 GridBee mixers
 - 7 Triton aerators
- Cell 2
 - 6 GridBee mixers
 - 8 Triton aerators
- Cell 3A
 - 3 GridBee mixers
 - 3 Triton aerators

Cost

The following items were included in the cost estimates:

- Construction Costs
 - Triton aerators
 - GridBee mixers
 - Electrical modifications
 - Controls and SCADA modifications
 - 20 percent of the above for unlisted items
 - General conditions
 - 30 percent construction contingency
- Non-Construction Costs
 - 20 percent of the construction cost for design and construction phase engineering
 - 5 percent of the construction cost for funding procurement and administration

4.6.2 Alternative 1B – Diffused Aeration Equipment

Description

Fine-bubble diffused air provides effective mixing and treatment for wastewater lagoons. The fine bubbles have a higher oxygen transfer capacity than the coarse bubbles produced by the static tube diffusers currently installed in Cells 4 and 5, therefore, fine-bubble diffusers use less air/energy while also supplying more oxygen in the same treatment volume as coarse bubble diffusers. This increases the treatment capacity for the available treatment volume.

For the purpose of this report, only equipment that includes fine-bubble diffusers was considered given the higher oxygen-transfer efficiency, which would be particularly important if future ammonia removal is desired or required. Diffuser assemblies would be supplied with air via in-lagoon laterals fed from buried headers and blowers located on shore in a new blower building. Both floating and submerged laterals are available. When consulting with two reputable suppliers of aeration equipment (Nexom, Triplepoint), both recommended floating laterals for the Jackson lagoon system. Submerged laterals, as well as other types of fine-bubble diffused aeration systems could be explored further during the design of aeration system upgrades. Details on some available types of lagoon aeration systems are provided in a technical memorandum included in Appendix D.

Each lateral would be equipped with an isolation valve on shore, providing control over where air would be introduced to the basin. In addition, the blowers can be ramped up or down to adjust airflow to actual system needs. The ability to use a lower airflow when influent loading is below the design values can provide energy savings.

The diffused air equipment would be more evenly distributed across the lagoon floor than the existing floating aerators, creating a more even settling environment for sludge. While the first cell would be completely mixed and experience minimal sludge settling, the subsequent partially mixed cells would see increasing sludge settling with decreasing diffuser density. Diffuser density is tapered with larger spacing and fewer units as the flow proceeds through the cells because the increasingly cleaner water requires less and less oxygen for treatment.

As noted, Nexom and Triplepoint were consulted for proposals for diffused air systems to upgrade aeration in Cells 1, 2, and 3A. Both manufacturers initially considered parallel and series operation of Cells 1 and 2. Both concluded that as influent flows increase, the primary cells should be operated in series to achieve a higher treatment capacity and reduce overall aeration requirements. Since the spacing of aeration equipment for series operation would be very different from parallel operation, the decision to switch to series operation would need to be made at the time of the upgrade of the system. For this report, series operation was assumed. Both manufacturers proposed a baffle in Cell 1 to separate the completely mixed zone from the following partially mixed zone. Both manufacturers provided preliminary designs that would

- use series operation of the primary cells,
- provide a completely mixed Cell 1A, and partially mixing, tapered aeration thereafter,
- remove the existing Cell 1 baffle and install a north-south oriented baffle with windows,

- introduce a new transfer pipe and control structure at the west end between Cells 1 and 2,
- use floating aeration laterals,
- achieve a minimum dissolved oxygen level of 2.0 mg/L,
- and can serve a peak month flow of 4.0 mgd, at both annual average and peak month cBOD and TSS loads.

Nexom also provided an outlook for operation at an influent flow of 6.5 mgd, assuming the same wastewater strength. Nexom advised that conversion of the entire Cell 1 to a completely mixed basin would provide the necessary treatment upstream of any ammonia or nutrient removal facility to accommodate a flow of 6.5 mgd.

Operation and maintenance of these types of aeration systems consists of regular checks on bubble patterns, exercising lateral isolation valves, and replacing the diffuser membranes every seven to ten years. As noted above, this can be accomplished without draining the lagoon from a floating service platform. Nexom and Triplepoint both offer service contracts for this work.

Alternative 1B1 - Nexom | EDI. Nexom | EDI proposed floating laterals and two types of diffuser assemblies with four or eight tubes that hang from the floating laterals about one to two feet above the lagoon bottom. Hanging the diffusers maintains an even level for even air distribution. Assemblies can be retrieved for service from a floating dock or other service platform. The proposed equipment would be as follows:

- Cell 1A: 33 floating laterals with about 400 eight-tube diffuser assemblies
- Cell 1B: 10 floating laterals with about 180 four-tube diffuser assemblies
- Cell 2: 7 floating laterals with about 120 four-tube diffuser assemblies
- Cell 3A: 2 floating laterals with 14 four-tube diffuser assemblies

Nexom did not include blowers in their proposal but provided information for blower design. Blowers capable of delivering about 18,000 scfm of air flow will be needed.

Alternative 1B2 - Triplepoint. Triplepoint's Ares diffusers combine fine-bubble and coarse-bubble aeration into one diffuser unit. Each diffuser has a central vertical static tube that provides coarse bubble aeration for enhanced mixing. Ten fine-bubble diffuser pipes extend horizontally from the static tube in a concentric pattern. These assemblies sit on the lagoon bottom and different pedestal extensions are available to compensate for fluctuating lagoon bottom elevations. These diffusers would be spaced further apart than the Nexom diffusers because they include more individual diffuser tubes per assembly. Diffusers are served by individual header lines and provide 15 – 80 scfm, each, with a design airflow of 35 scfm. It is unclear how many laterals Triplepoint would be using. The proposed equipment is as follows:

- Cell 1A: 164 diffuser assemblies
- Cell 1B: 30 diffuser assemblies
- Cell 2: 36 diffuser assemblies
- Cell 3A: 6 diffuser assemblies

Triplepoint included blowers capable of delivering an airflow of about 15,000 scfm.

Cost

Costs for the diffused aeration alternatives include the following:

- Construction Cost
 - Aeration equipment (diffuser assemblies, tubing, laterals)
 - Air header piping
 - Floating baffle curtain
 - Piping and control structure to support series operation of Cells 1 and 2
 - Blowers
 - Blower building
 - Electrical
 - Controls and SCADA modifications
 - General conditions
 - 30 percent construction contingency
- Non-Construction Costs
 - 20 percent of the construction cost for design and construction phase engineering
 - 5 percent of construction cost for funding procurement and administration

4.6.3 Alternative Cost Comparison

Diffused air equipment is more expensive than surface aerator equipment. Of the two diffused air manufacturers, Triplepoint is more expensive. These costs do not include operating and maintenance costs. These costs are based on 2026 values and should be inflated accordingly for future considerations.

Costs for the two different fine-bubble aeration systems were averaged and the average was used in Chapter 5 to estimate costs for the three proposed construction phases.

Table 4-1 – Cost Comparison for Aeration Upgrade Alternatives¹

Alternative	Construction Cost	Non Construction Cost	Total Project Cost
Alt 1A: Replace with Like Equipment	\$4,636,000	\$1,159,000	\$5,795,000
Alt 1B1: Diffused Aeration – Nexom	\$5,959,000	\$1,490,000	\$7,449,000
Alt 1B2: Diffused Aeration - Triplepoint	\$8,458,000	\$2,115,000	\$10,573,000
Average Alt 1B – Diffused Aeration	\$7,209,000	\$1,803,000	\$9,011,000
1. Costs are expressed as 2026 dollars.			

4.6.4 Other Potential Systems

There are other manufacturers that provide aeration equipment for lagoons. At the time of design, it may be prudent to further consider other manufacturers and equipment per the Town's preferences. The Town has specifically shown interest in the Titus Twister. Titus was contacted for further information on their equipment to include in this report; however, the response was received too late and was incomplete; therefore, the equipment was not included above.

4.7 Near-Term Need 2: Sludge Removal

Sludge removal in Cells 1, 2, and 3A can be achieved by a number of methods. The two options determined to be best suited for the Town of Jackson are dewatering in place and removal by dredging. Dredging would allow for sludge removal from all cells in the same year. However, dredging is more costly than dewatering in place and minimizing dredging will reduce the sludge removal cost. Therefore, it may be preferable to spread out sludge removal over several years and address one cell at a time.

The Town plans to create a temporary storage site adjacent to the lagoon system. This site will include lined containment and a pump station to return draining liquid or precipitation runoff back to the WWTP for treatment.

Final disposal alternatives are not included in this report. The Town is hesitant about land application of the sludge because of potential forever chemicals (PFAS, PFOS, PFOA, and others) that could contaminate the land application site. Ski wax contains variations of these chemicals, and while sludge has not been tested, WWTP staff expect there to be a potential presence of these forever chemicals. Other disposal methods include landfilling in a standard municipal landfill, surface disposal, which means disposal in a landfill dedicated to only sludge, incineration, and others.

Removal and temporary sludge storage alternatives include:

- Alternative 2A: Dewater in Place and Haul to Local Temporary Storage Site
- Alternative 2B: Dredge and Pump to Dewatering at Local Temporary Storage Site

4.7.1 Alternative 2A: Dewatering In Place

Dewatering sludge in place utilizes the existing treatment cell as a sludge drying bed and typically occurs as follows:

- Pumping out the majority of wastewater without disturbing the sludge layer.
- Allowing this layer to dry and further settle
- Intermittent pumping of settled water from a low area or sump to encourage the draining and dewatering process. This drain water would be pumped into a neighboring online Cell.
- If suitable equipment is available and access to the lagoon cell can be facilitated with heavy equipment, it may be advantageous to move and disturb the sludge to break the

dry crust and further facilitate draining and drying. Thicker sludge layers may be spread out into areas with little sludge accumulation.

- Dewatered sludge would be loaded and hauled with regular dirt-moving equipment.

The duration of this process depends on the thickness of the sludge layer and the ability to manipulate the sludge to facilitate dewatering. For the purpose of this report it was assumed that lagoon cells would be allowed to dry from May through September and sludge would be removed in October and November. This means that the cell slated for sludge removal would be out of service for the entire summer and fall seasons. At current influent flows and loads, the remaining lagoon cells provide adequate hydraulic and treatment capacity to allow for this approach.

After the sludge is dried to approximately 15 % solids and does not leak free liquid, it can be handled with earth moving equipment to stockpile in the temporary, lined storage area adjacent to the lagoon.

Dewatering in place is a good option for sludge drying when time is not a concern, as it only requires labor to move the sludge once. Given the depth of the cells, which are up to 17 feet deep, it was assumed that a temporary access ramp would be built to allow the heavy equipment to safely enter and exit the basin. If the lagoon bottom is too soft, multiple ramps may need to be constructed into the basin floor to reach all sludge.

Cost

Costs for dewatering sludge in place for removal include the following items. It was assumed that lowering the water level in the cell and periodic pumping to further remove drainage would be performed by Town of Jackson personnel. Any manipulation of sludge, construction of an access ramp into the basins, and further dewatering would be performed by a contractor. While additional labor would be required for the initial cell draining effort, it was assumed that existing staff could work these tasks into their normal schedules. All items listed below were assumed to be performed by a contractor.

- Construction Cost for items performed by a contractor
 - Construction of temporary storage area, including 3-foot tall berms, HDPE liner, sump and pump station with discharge to Cell 3A
 - Construction of lagoon access ramps
 - Sludge manipulation and removal with earth moving equipment, hauling, and unloading at the temporary storage site
 - General conditions, including three mob/demob
 - 30 percent construction contingency
- Non-Construction Costs
 - 20 percent of the construction cost for design and construction phase engineering
 - 5 percent for funding procurement and administration

4.7.2 Alternative 2B: Dredging

Dredging uses a horizontal auger to stir up settled sludge while simultaneously pumping the sludge to a tank. The auger is typically mounted in a cage that protects the lagoon bottom from damage. Pumped sludge can be screened to remove larger debris. It is possible to employ a segment of clear plastic pipe to monitor the dredged sludge and see when liquid clears up to gauge when to move the dredge to a new spot.

Dredging typically leaves a 6-inch to 12-inch layer of non-compacted sludge in the bottom of a lagoon to protect the liner. Complete cleanout of a cell is when this remaining sludge layer is mechanically removed. This is a labor and time intensive process. While dredging of all three cells could happen at once, it would make most sense to perform a complete cleanout when the cells are to be relined. Performing complete cleanout at different times incurs additional contractor fees for each mobilization/demobilization.

From the tank, sludge can be pumped to filter bags, i.e. geobags, for dewatering or through mechanical dewatering equipment. Both could be staged at the site where the sludge will be temporarily stored. Both would also require the addition of polymer to facilitate proper dewatering of the sludge. Mobile polymer feed equipment would be staged near the dewatering equipment or geobags for injection and mixing in the pipe prior to discharge.

Dredging in place is a good option when lagoon cells cannot be taken offline for extended periods of time. Per a dredging contractor, typically the water level should be lowered to about 10 feet for dredging. Water in the basin is used to suspend the sludge and pump it out. When dredging is complete, the cell can be returned to service.

Cost

Costs for sludge removal via dredging and dewatering with geobags are summarized below.

- Construction Cost
 - Construction of temporary storage area, including 3-foot tall berms, HDPE liner, sump and pump station with discharge to Cell 3A
 - Dredging, pumping, dewatering in geobags, chemical addition
 - Complete cleanout
 - General conditions, including one mob/demob
 - 30 percent construction contingency
- Non-Construction Costs
 - 20 percent of the construction cost for design and construction phase engineering
 - 5 percent for funding procurement and administration

4.7.3 Alternative Cost Comparison

Dewatering in place is approximately one-fifth the cost of dredging, but below costs do not include labor associated with dewatering the cells and any other work the Town would perform themselves.

Table 4-2 – Dewatering Alternative Cost Comparison Summary

Alternative	Construction Cost	Non Construction Cost	Total Project Cost
Alt 2A: Dewatering in Place	\$1,976,000	\$494,000	\$2,470,000
Alt 2B: Dredging	\$5,591,000	\$1,398,000	\$6,989,000

4.8 Near-Term Need 3: Liner Replacement

The alternatives considered for replacing the existing clay liners in Cells 1, 2, and 3A are:

- Alternative 3A: Replace with geosynthetic clay liners
- Alternative 3B: Replace with HDPE liners

4.8.1 Alternative 3A: Replace with Geosynthetic Clay Liners

Geosynthetic clay liners sandwich a bentonite clay between two geotextile layers; the layers are joined and rolled up such that the product can be easily unrolled and installed onsite. Once installed and wetted, the clay expands and seals itself.

Technological advancements in clay liners have improved water-holding ability, and specialized clay compositions are used for specific applications. Liner manufacturers can test the wastewater and recommend the clay materials best suited to provide leak proofness and longevity. The following characteristics and considerations are associated with geosynthetic clay liners:

- Clay liners provide a water-tight barrier with minimal plastic components. The geotextile fabric is typically made from plastic materials; however, this fabric is not in contact with the wastewater due to the cover soil and is not expected to contribute microplastics to the effluent.
- The bedding material must be uniform and free of large gravel.
- The liner must be covered in 6 to 12 inches of soil to provide confining pressure and limit liner swelling. Thicker cover layers are also necessary if groundwater is present.
- The liner must stay hydrated at all times to maintain leak-proofness.
- There are no special tools required for liner installation and general contractors can perform the installation with guidance from the liner supplier.
- Leak detection is performed through visual inspection of the liner and installation and is demonstrated through water-holding tests that require a full basin and can take several weeks to complete.

- Clay liners have very low permeability but are technically not impermeable.
- Future sludge removal from a soil-covered geosynthetic clay liner is difficult and may require leaving sludge behind to guarantee that the soil cover and liner are not removed or damaged in the process. Removal would almost certainly have to be performed by dredging because the liner cannot be allowed to dry out if the cell were emptied to dewater sludge in place.

Maintenance for geosynthetic clay liners include diligent vegetation and rodent control above and immediately below the water surface. The soil cover combined with nutrient rich moisture provides ideal growth conditions. Plant roots can penetrate the liner and cause leaks along the root fibers. Burrowing animals such as muskrats, gophers, or even beavers may try to move in and threaten liner integrity.

The useful service life of a geosynthetic clay liner is highly dependent on environmental influences. When undisturbed under the soil layer, the liner will last indefinitely. However, plants, burrowing animals, or erosion caused by inadequately designed or installed equipment could cause damage to the liner at any time.

Cost

Costs for geosynthetic clay liners include the following:

- Construction Cost
 - Subgrade preparation, including restoration of side and bottom gradation, removal of rocks, and smoothing for receiving the geosynthetic clay liner
 - Geosynthetic clay liner
 - Soil cover
 - Hydrostatic leak testing
 - 30 percent construction contingency

Note that shipping costs for the liner were not known and not included in the cost estimate. However, shipping costs can be significant for geosynthetic clay liners due to weight alone.

- Non-Construction Costs
 - 20 percent of the construction cost for design and construction phase engineering
 - 5 percent for funding procurement and administration

4.8.2 Alternative 3B: Replace with HDPE Liners

HDPE liners provide a reliable means for water holding and are proven to have a long lifespan even for portions exposed to sunlight. For wastewater lagoons, the typical HDPE liner thickness is 60 mil. The following characteristics and considerations are associated with HDPE liners:

- Installation is typically performed by liner suppliers with help from the general contractor, because they require specific placement and sealing methods that general contractors are not typically equipped to perform.

- Synthetic liners are more susceptible to damage during installation.
- HDPE liners can be provided with a textured surface that makes them safer to walk on when wet.
- If high and/or fluctuating groundwater is present, a drainage layer should be installed under the synthetic liner. Drainage layers can be geocomposite materials or small-diameter perforated tubing sandwiched between geofabric.
- HDPE liners can be leak tested with electric leak location (ELL) testing, which can be performed in a day or two for each cell.
- 60-mil HDPE liners are very difficult for burrowing animals to penetrate. They also offer less incentive because there is no soil or vegetation on the liner.
- While unlikely once covered with biofilm, it is possible that HDPE liners could contribute to the discharge of microplastics with the effluent.
- HDPE liners are impermeable.
- Future sludge removal from an HDPE liner is easy because the liner holds up well to various sludge removal methods.

There is no maintenance required of HDPE liners unless there are signs of deterioration. HDPE liners are UV-resistant and can be exposed to the sun for long periods; therefore, unlike clay liners, HDPE liners can be left dry for extended periods of time without damage. This maintains the operational flexibility of the cells. The cell could be drained such that there is no standing water or need for aeration.

The service life of HDPE liners is generally estimated to be about 20 to 30 years with the biggest threat to liner integrity being mechanically caused damage by equipment or during maintenance events. Spot damage can be extrusion welded in place.

Cost

Costs for HDPE liners include the following:

- Construction Cost
 - Subgrade preparation, including restoration of side slopes and grading the bottoms to have a 2 percent slope, smoothing
 - Drainage layer consisting of perforated tubing between geofabric layers
 - HDPE liner and accessories
- Non-Construction Costs
 - 20 percent of the construction cost for design and construction phase engineering
 - 5 percent for funding procurement and administration

4.8.3 Alternative Cost Comparison

The installed cost for geosynthetic clay liners is estimated to be only about half of that of HDPE liners with a drainage layer. The estimated amount of liner required per cell, and the cost for each liner type is summarized in Table 4-3. Although similar in cost, it is important to note that

clay liners can operate indefinitely if properly maintained, whereas HDPE liners must eventually be replaced.

Table 4-3 – Lagoon Liner Alternative Cost Comparison

Alternative	Construction Cost	Non Construction Cost	Total Project Cost
Alt 3A: Geosynthetic Clay Liner	\$4,438,000	\$1,110,000	\$5,548,000
Alt 3B: HDPE Liner	\$4,656,000	\$1,164,000	\$5,820,000

CHAPTER 5

IMPLEMENTATION STRATEGY

5.1 Proposed Project

The alternatives selected from Chapter 4, based on input from Town officials are

- Alternative 1B – Replace aeration equipment with fine bubble diffusers.
- Alternative 2A – Dewater sludge in place.
- Alternative 3A – Replace existing clay liners with geosynthetic clay liners.

Figure 5-1 shows the general locations of proposed improvements.

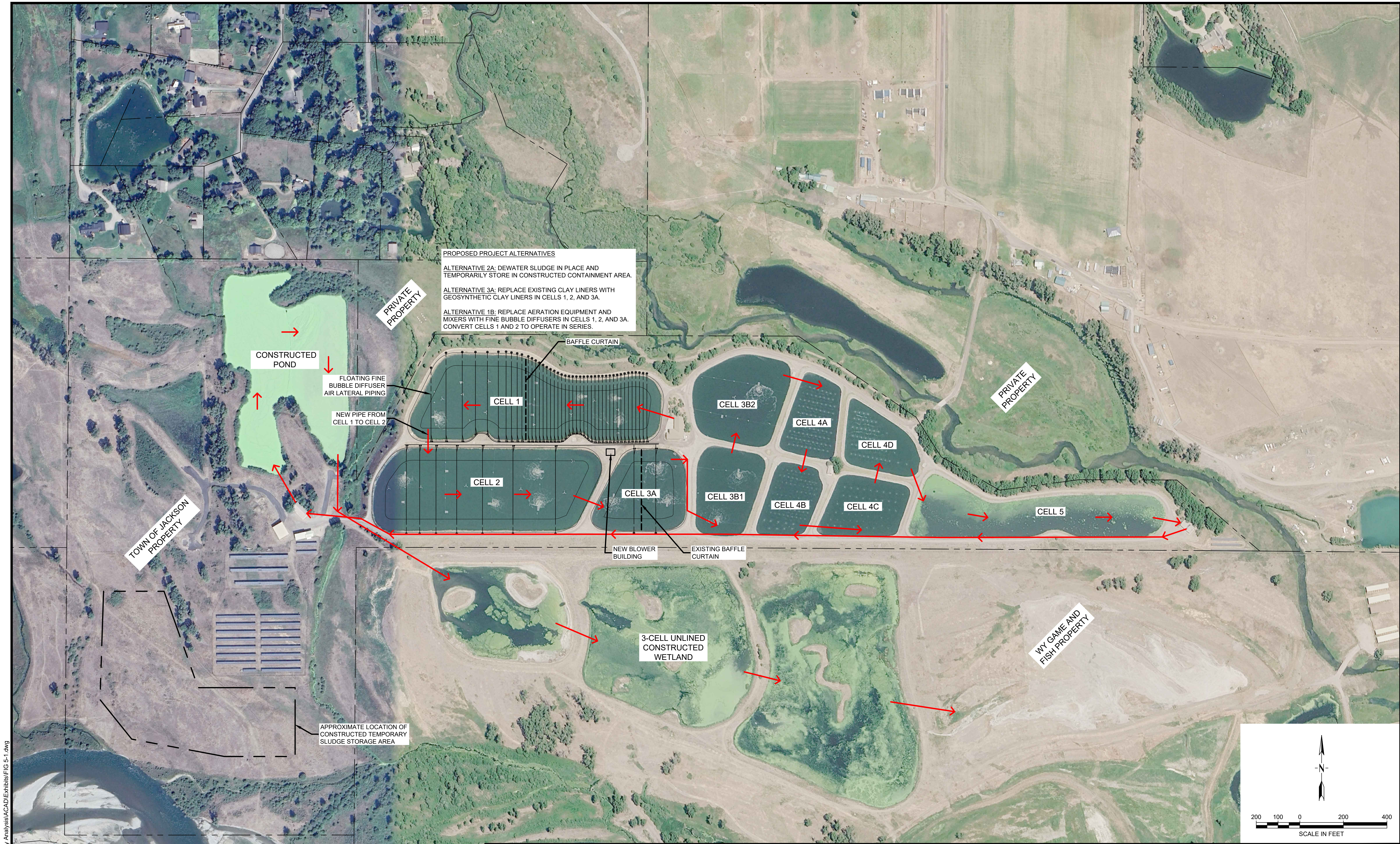
5.2 Implementation Strategy and Project Schedule

5.2.1 Strategy and Project Duration

Replacing the aeration equipment with fine bubble diffusers and replacing the liners necessitates that the cells be completely drained and sludge removed. This requires the ability to isolate each of the affected cells and bypass them into the subsequent cell. Record drawings suggest that this is possible when combined with installation of the new flow control structure at the west end between Cells 1 and 2. Modifications to the existing Cell 1 effluent flow control structure may be needed. More thorough investigations will be needed to confirm this strategy.

Since the selected sludge removal method is dewatering in place, the project will occur in three phases, one phase for each cell. If sludge dewatering and removal is scheduled for May through September and liner replacement occurs in October and November, installation of the aeration system would need to be postponed until spring of the following year. If early frost occurs, the liner installation itself may need to be postponed to the next spring.

Each cell should be filled as soon as the liner is placed to expand the clay and create a tight seal. The floating lateral diffused aeration system can be installed in a full basin later. For this report, it was assumed that the new aeration system would not be fully operable until June or July, which would cut the window for dewatering the second cell short. Therefore, phasing was assumed to take two years for each cell for a total project duration of six years.

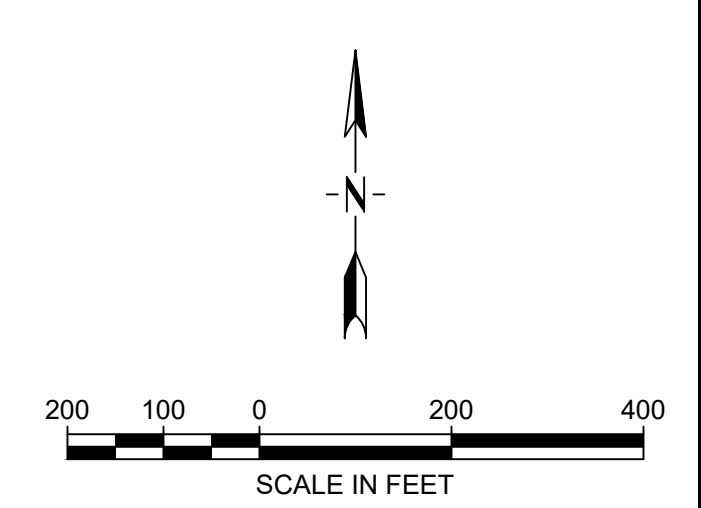


PROPOSED PROJECT ALTERNATIVES

ALTERNATIVE 2A: DEWATER SLUDGE IN PLACE AND TEMPORARILY STORE IN CONSTRUCTED CONTAINMENT AREA.

ALTERNATIVE 3A: REPLACE EXISTING CLAY LINERS WITH GEOSYNTHETIC CLAY LINERS IN CELLS 1, 2, AND 3A.

ALTERNATIVE 1B: REPLACE AERATION EQUIPMENT AND MIXERS WITH FINE BUBBLE DIFFUSERS IN CELLS 1, 2, AND 3A. CONVERT CELLS 1 AND 2 TO OPERATE IN SERIES.



V:\5439\001- WW Capacity Analysis\ACAD\Exhibits\Fig 5-1.dwg

 engineers • surveyors • planners • scientists Plotted by jerry a. chambers on May/15/2026	 315 N. 25th Street, Suite 102 Billings, MT 59101  406.656.6000  www.m-m.net COPYRIGHT © MORRISON-MAIERLE, 2026	DRAWN BY: JAC DSGN. BY: RL APPR. BY: RL DATE: 05/2026	TOWN OF JACKSON / TETON COUNTY WASTEWATER CAPACITY ANALYSIS	PROJECT NO. 5439.001
		JACKSON	WYOMING	FIGURE NUMBER FIG. 5-1

5.2.2 Operation During Construction

Given the current flows, the facility can reliably operate with only a single primary cell in operation for an extended period of time and still meet the hydraulic retention time requirements of WY DEQ Chapter 11 Standards (as detailed in Chapter 3). The below hydraulic limits are applicable for the project schedule.

- The facility can operate with Cell 1 out of service up until a peak month flow of 3.7 mgd. This accounts for the reduced hydraulic retention time in Cells 2 and 3A due to sludge.
- The facility can operate with both Cells 2 and 3A and simultaneously out of service up until a peak month flow of 3.6 mgd. This assumes Cell 1 just had sludge removed and is operating at full capacity.

It is estimated that 3.6 mgd will be reached by 2042, and the Town has time to implement all phases of the project before reaching these hydraulic limits. After reaching 3.6 mgd, dredging for sludge removal may become the more favorable option to reduce cell downtime.

5.2.3 Proposed Project Schedule

Assuming the project is initiated in 2028, the recommended phases of the project are as follows:

- Phase 1 – Cell 1, Blower Building, Cell 1-2 Flow Control Structure, Cell 1 Effluent Pipe, Equipment Procurement:
 - Early Spring 2028 – Take Cell 1 offline and drain it to initiate the dewatering process.
 - Spring through Fall 2028 – submittal review for equipment for the complete project.
 - August-September 2028 – construction of an extension of the existing Cell 1 effluent pipe west, the new Cell 1 effluent pipe, and flow control structure in the berm between Cells 1 and 2.
 - September 2028 – Move sludge to onsite storage location.
 - October-November 2028 – Liner installation and Cell fill.
 - April – August 2029 – construction of blower building, blower installation, header piping installation, and aeration system installation.
- Phase 2 – Cells 2 and New Cell 2 Influent Pipe:
 - Early Spring 2030 – Take Cell 2 offline and drain it to initiate the dewatering process.
 - August-September 2030 – construction of the new Cell 2 influent pipe and connection to the flow control structure in the berm between Cells 1 and 2.
 - September 2030 – Move sludge to onsite storage location.
 - October-November 2028 – Liner installation and Cell fill.
 - April – August 2031 – header piping and aeration system installation.

- Phase 3 – Cell 3:
 - Early Spring 2032 – Take Cell 3 offline and drain it to initiate the dewatering process.
 - September 2032 – Move sludge to onsite storage location.
 - October – Liner installation and Cell fill.
 - November 2032 or spring 2033 – header piping and aeration system installation.

5.3 Project Cost

The proposed project costs presented in Chapter 4 were roughly split into costs for the three phases. This split is not exact and is intended only for rough planning purposes. A more detailed conceptual design and cost estimating will be needed to develop cost estimates suitable for budgeting.

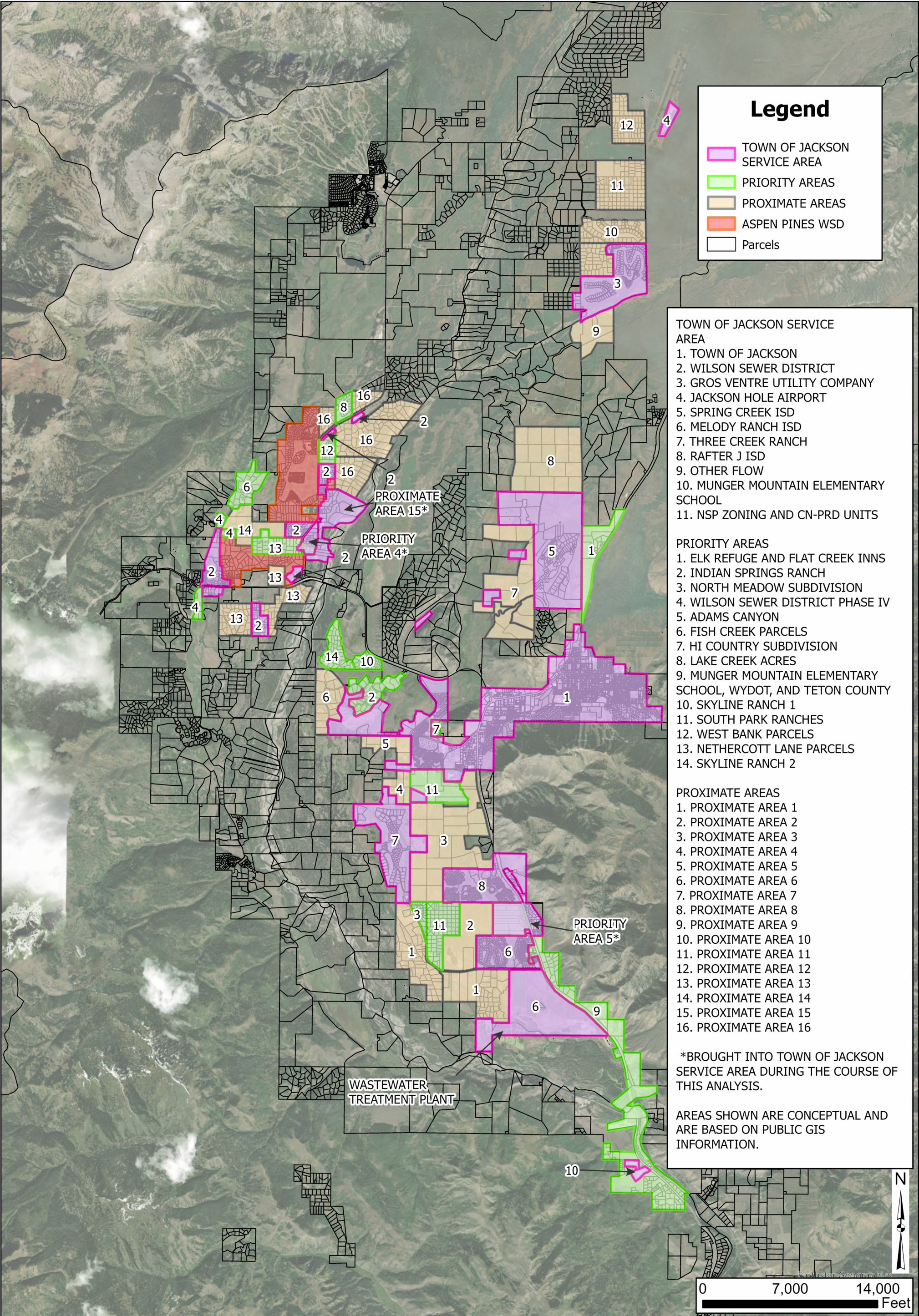
Phase 1 includes costs for all equipment and labor/materials for the above-listed construction items. Subsequent phases only include labor/materials for the listed construction items. Liner costs are included in each phase.

Costs were inflated for their respective construction years to aid in planning and funding procurement. Table 5-1 shows the inflated project costs.

Table 5-1 – Proposed Total Project Cost¹

Phase	Total Project Cost
Phase 1: Cell 1, Blower Building, Cell 1-2 Flow Control Structure, Cell 1 Effluent Pipe, Equipment Procurement (2028/2029)	\$9,440,000
Phase 2: Cells 2 and New Cell 2 Influent Pipe (2030/2031)	\$5,820,000
Phase 3: Cell 3 (2032/2033)	\$2,380,000
1. Costs were inflated from 2026 for the listed construction years by 3.7% per year.	

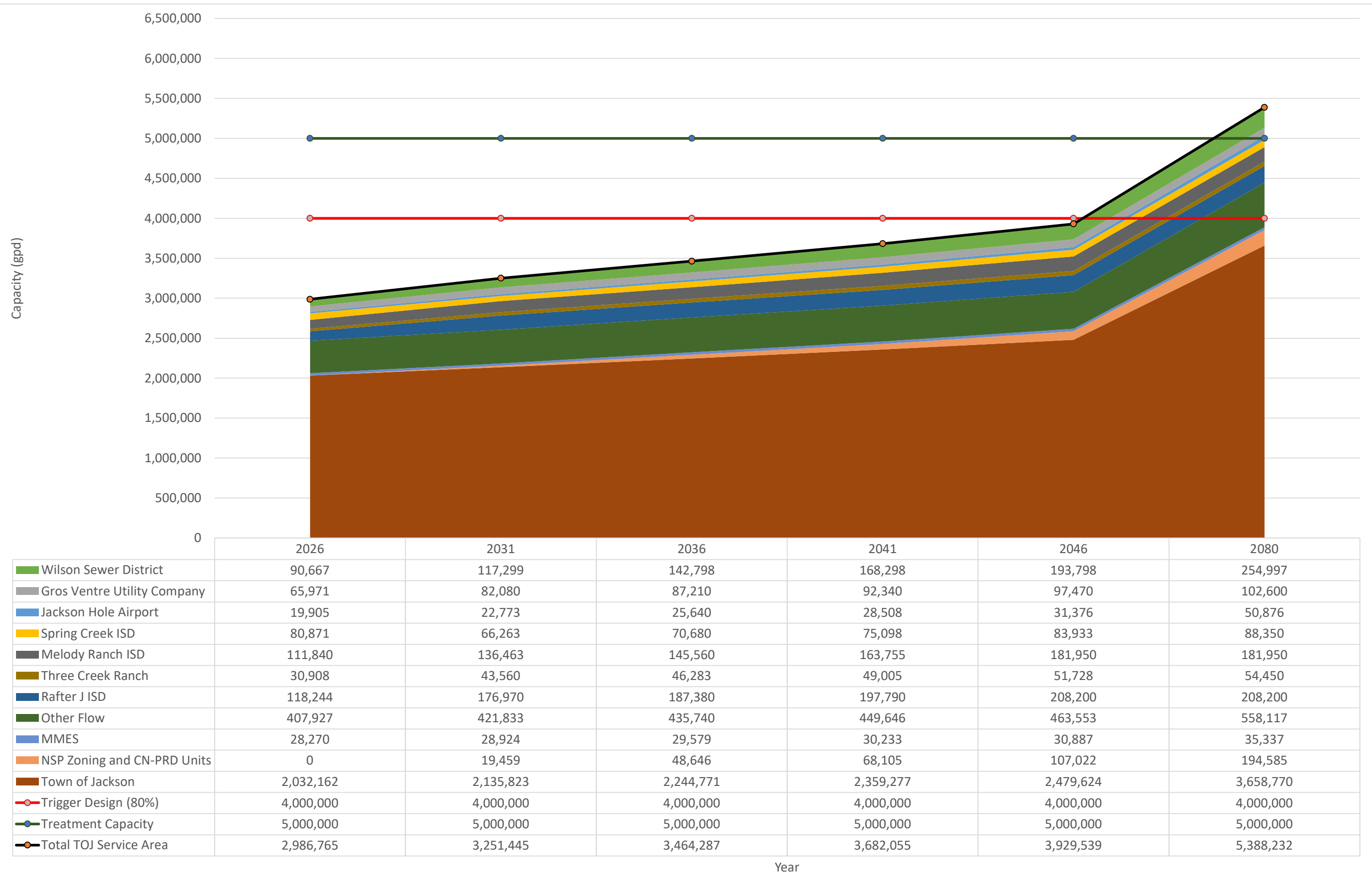
APPENDIX A – Town of Jackson Wastewater Service Area Map



APPENDIX B – Wastewater Generation Projections

Town of Jackson WY
 Development Projections
 Lagoon Wastewater Treatment
 Scenario A- Peak Day, Peak Month

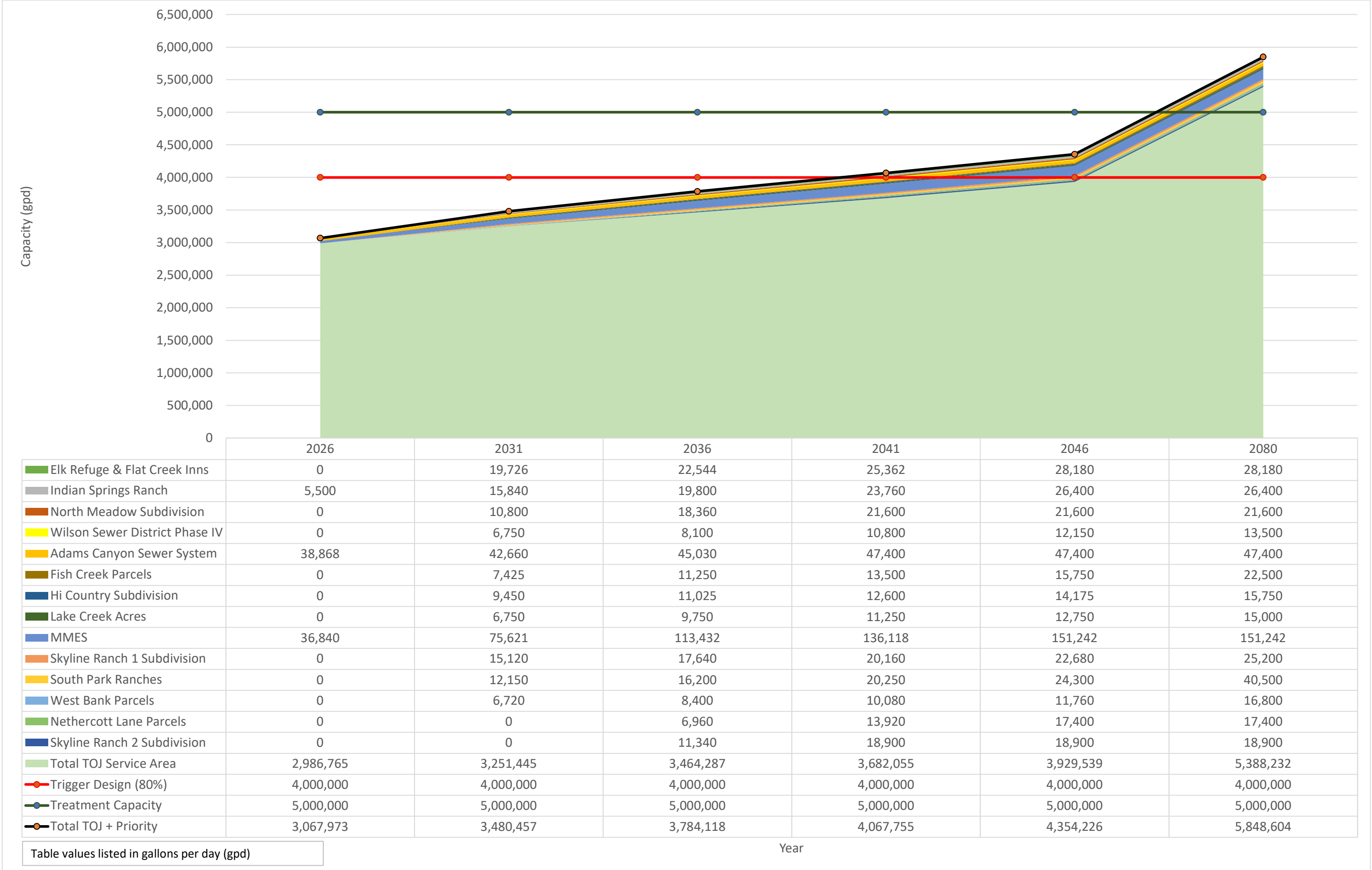
	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
<i>Current Connections</i>						
Town of Jackson	2,032,162	2,135,823	2,244,771	2,359,277	2,479,624	3,658,770
Wilson Sewer District	90,667	117,299	142,798	168,298	193,798	254,997
Gros Ventre Utility Company	65,971	82,080	87,210	92,340	97,470	102,600
Jackson Hole Airport	19,905	22,773	25,640	28,508	31,376	50,876
Spring Creek ISD	80,871	66,263	70,680	75,098	83,933	88,350
Melody Ranch ISD	111,840	136,463	145,560	163,755	181,950	181,950
Three Creek Ranch	30,908	43,560	46,283	49,005	51,728	54,450
Rafter J ISD	118,244	176,970	187,380	197,790	208,200	208,200
Other Flow	407,927	421,833	435,740	449,646	463,553	558,117
MMES	28,270	28,924	29,579	30,233	30,887	35,337
NSP Zoning and CN-PRD Units	0	19,459	48,646	68,105	107,022	194,585
Total TOJ Service Area	2,986,765	3,251,445	3,464,287	3,682,055	3,929,539	5,388,232
Treatment Capacity	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000
Trigger Design (80%)	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000
					Upgrade 1 Estimate	



Town of Jackson WY
Development Projections
Lagoon Wastewater Treatment
Scenario A- Peak Day, Peak Month

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Total TOJ Service Area	2,986,765	3,251,445	3,464,287	3,682,055	3,929,539	5,388,232
<i>Future Connections</i>						
Elk Refuge & Flat Creek Inns	0	19,726	22,544	25,362	28,180	28,180
Indian Springs Ranch	5,500	15,840	19,800	23,760	26,400	26,400
North Meadow Subdivision	0	10,800	18,360	21,600	21,600	21,600
Wilson Sewer District Phase IV	0	6,750	8,100	10,800	12,150	13,500
Adams Canyon Sewer System	38,868	42,660	45,030	47,400	47,400	47,400
Buffer Areas	This is covered in proximate					
Fish Creek Parcels	0	7,425	11,250	13,500	15,750	22,500
Hi Country Subdivision	0	9,450	11,025	12,600	14,175	15,750
Lake Creek Acres	0	6,750	9,750	11,250	12,750	15,000
MMES	36,840	75,621	113,432	136,118	151,242	151,242
Skyline Ranch 1 Subdivision	0	15,120	17,640	20,160	22,680	25,200
South Park Ranches	0	12,150	16,200	20,250	24,300	40,500
West Bank Parcels	0	6,720	8,400	10,080	11,760	16,800
Nethercott Lane Parcels	0	0	6,960	13,920	17,400	17,400
Skyline Ranch 2 Subdivision	0	0	11,340	18,900	18,900	18,900
Total Priority Area Connections	81,208	229,012	319,831	385,700	424,687	460,372
Total TOJ + Priority	3,067,973	3,480,457	3,784,118	4,067,755	4,354,226	5,848,604
Treatment Capacity	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000
Trigger Design (80%)	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000

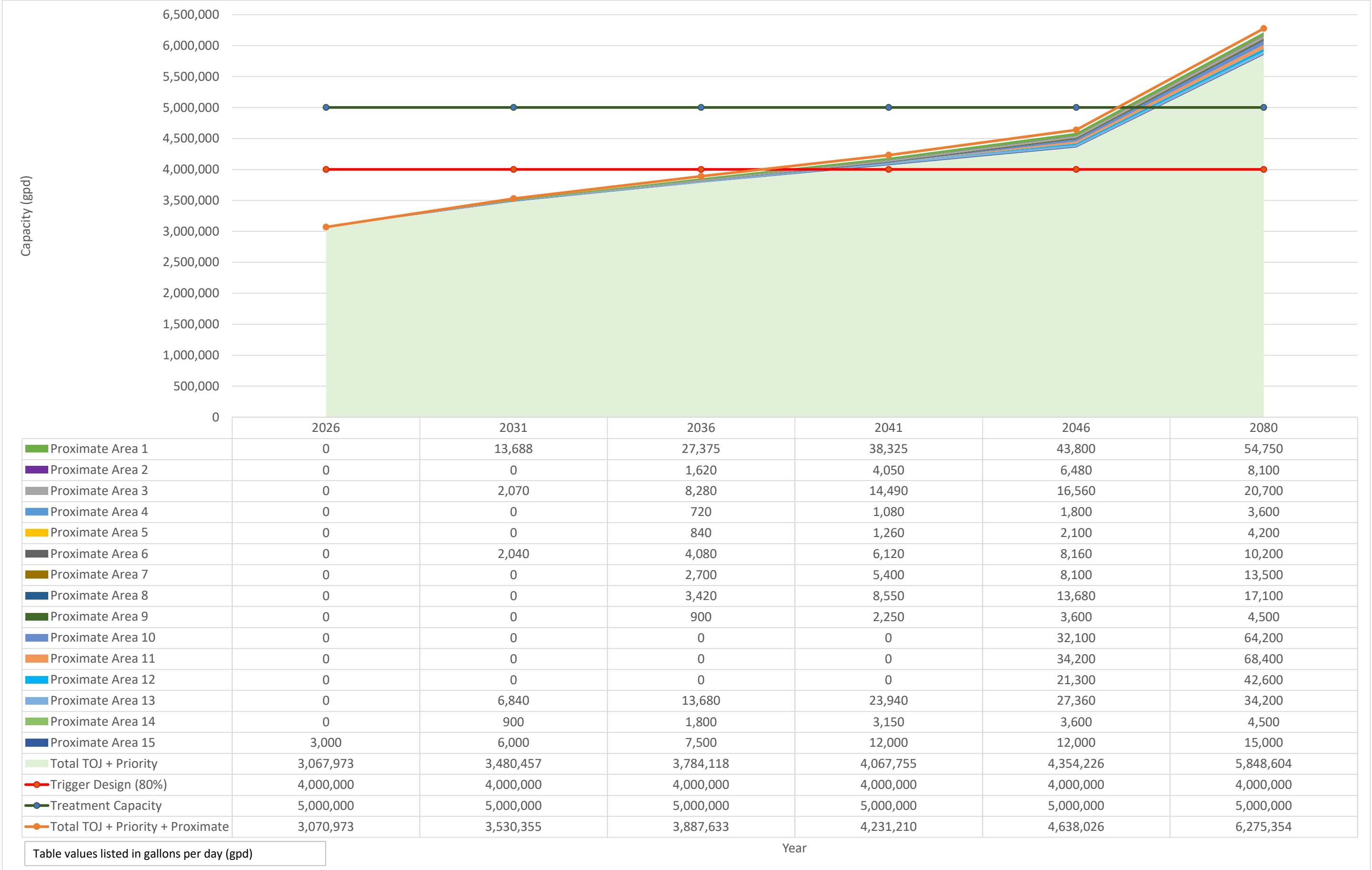
Upgrade 1
Estimate



Town of Jackson WY
Development Projections
Lagoon Wastewater Treatment
Scenario A- Peak Day, Peak Month

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Total TOJ + Priority	3,067,973	3,480,457	3,784,118	4,067,755	4,354,226	5,848,604
Future Connections						
Proximate Area 1	0	13,688	27,375	38,325	43,800	54,750
Proximate Area 2	0	0	1,620	4,050	6,480	8,100
Proximate Area 3	0	2,070	8,280	14,490	16,560	20,700
Proximate Area 4	0	0	720	1,080	1,800	3,600
Proximate Area 5	0	0	840	1,260	2,100	4,200
Proximate Area 6	0	2,040	4,080	6,120	8,160	10,200
Proximate Area 7	0	0	2,700	5,400	8,100	13,500
Proximate Area 8	0	0	3,420	8,550	13,680	17,100
Proximate Area 9	0	0	900	2,250	3,600	4,500
Proximate Area 10	0	0	0	0	32,100	64,200
Proximate Area 11	0	0	0	0	34,200	68,400
Proximate Area 12	0	0	0	0	21,300	42,600
Proximate Area 13	0	6,840	13,680	23,940	27,360	34,200
Proximate Area 14	0	900	1,800	3,150	3,600	4,500
Proximate Area 15	3,000	6,000	7,500	12,000	12,000	15,000
Proximate Area 16	0	18,360	30,600	42,840	48,960	61,200
Total Proximate Connections	3,000	49,898	103,515	163,455	283,800	426,750
Total TOJ + Priority + Proximate	3,070,973	3,530,355	3,887,633	4,231,210	4,638,026	6,275,354
Treatment Capacity	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000
Trigger Design (80%)	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000

Upgrade 1
Estimate

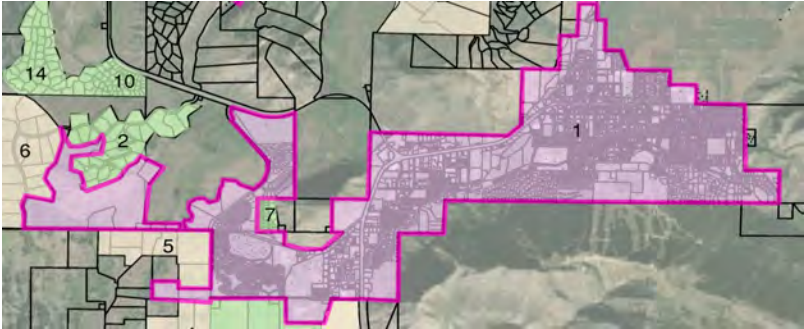


Town of Jackson WY
 Development Projections
 Town Service Area
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Town Service Area	2,032,162	2,135,823	2,244,771	2,359,277	2,479,624	3,658,770
% Built Out	56%	58%	61%	64%	68%	100%

Parameters		
Growth Rate/ Year	1.00%	Comprehensive Plan-2020, Appendix B, Table 1

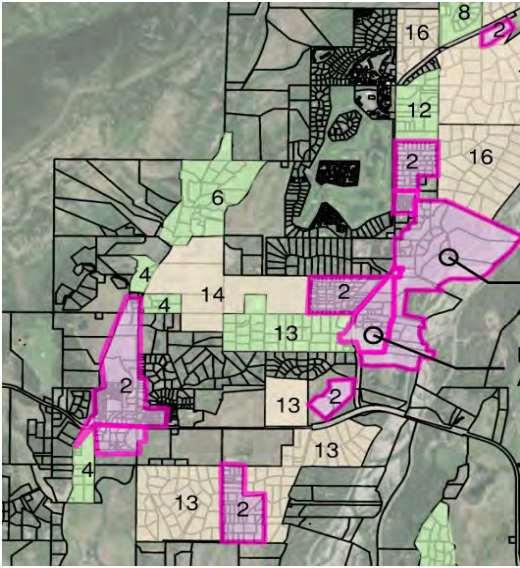
Calculations		
Current Flow	2,032,162	gpd
Current % build out	56%	Assumption
Total WW Flow (Ave Day, Peak Month)	3,048,975	gpd
Total WW Flow (Peak Day, Peak Month)	3,658,770	gpd



Town of Jackson WY
 Development Projections
 Wilson Sewer District
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Wilson Sewer District	90,667	117,299	142,798	168,298	193,798	254,997
% Built Out	36%	46%	56%	66%	76%	100%

Calculations		
Current Flow	90,667	gpd
Current % build out	36%	
Total WW Flow (Ave Day, Peak Month)	212,498	gpd
Total WW Flow (Peak Day, Peak Month)	254,997	gpd

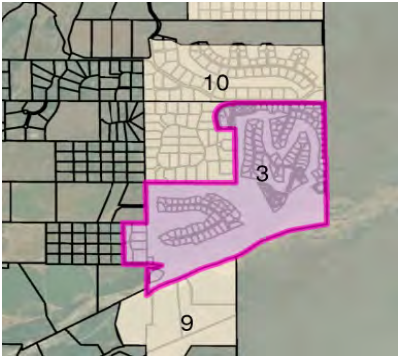


Town of Jackson WY
Development Projections
Gros Venture Utility Company
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Gross Venture Utility Company	65,971	82,080	87,210	92,340	97,470	102,600
% Built Out	75%	80%	85%	90%	95%	100%

Parameter	Value	Source	Notes
Zoning	PR and NC	County GIS	
Total Residential Parcels	258	county GIS	
Existing Single-Family	108		
Existing Multi-Family	150	visual count	
Vacant Single Family	20	visual count	
Vacant Multi-Family	0	visual count	
ARUs Percentage	50	Assumption	
ARU Potential	64		
Total Potential Dwellings	342		

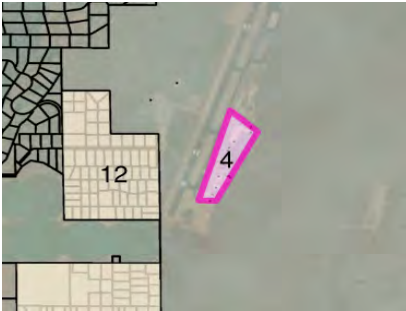
Calculations		
Existing Wastewater Flow/Dwelling	256	gpd
Plan Wastewater Flow/Dwelling	250	gpd
Current % build out	75%	
Total WW Flow (Ave Day, Peak Month)	85,500	gpd
Total WW Flow (Peak Day, Peak Month)	102,600	gpd



Town of Jackson WY
Development Projections
Jackson Hole AP
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Jackson Hole AP	19,905	22,773	25,640	28,508	31,376	50,876
% Built Out	39%	45%	50%	56%	62%	100%

Calculations		
Current Flow	19,905	gpd
Current % build out	39%	
Total WW Flow (Ave Day, Peak Month)	42,397	gpd
Total WW Flow (Peak Day, Peak Month)	50,876	gpd

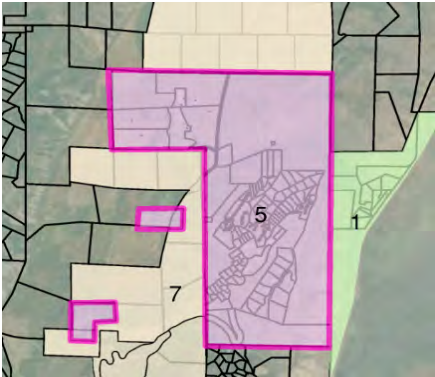


Town of Jackson WY
 Development Projections
 Spring Creek ISD
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Spring Creek ISD	80,871	66,263	70,680	75,098	83,933	88,350
% Built Out	69%	75%	80%	85%	95%	100%

Parameter	Value	Source	Notes
Zoning	PUD ND	County GIS	
Total Residential Parcels	204	county GIS	
Existing Single-Family	125		
Existing Multi-Family	79	visual count	
Vacant Single Family	18	visual count	
Vacant Multi-Family	1	visual count	
ARUs Percentage	50	Assumption	
ARU Potential	72		
Total Potential Dwellings	295		

Calculations		
Existing Wastewater Flow/Dwelling	396	gpd
Plan Wastewater Flow/Dwelling	250	gpd
Current % build out	69%	
Total WW Flow (Ave Day, Peak Month)	73,625	gpd
Total WW Flow (Peak Day, Peak Month)	88,350	gpd

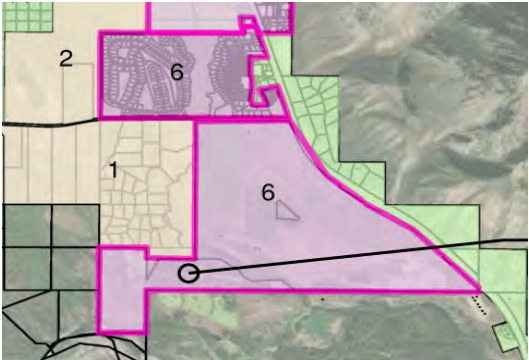


Town of Jackson WY
 Development Projections
 Melody Creek ISD
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Melody Creek ISD	111,840	136,463	145,560	163,755	181,950	181,950
% Built Out	60%	75%	80%	90%	100%	100%

Parameter	Value	Source	Notes
Zoning	PUD R-3	County GIS	mostly PUD R3, but parcels vary within the region
Total Residential Parcels	366	county GIS	
Existing Single-Family	304		
Existing Multi-Family	62	visual count	
Vacant Single Family	11	visual count	
Vacant Multi-Family	0	visual count	
ARUs Percentage	50	Assumption	
ARU Potential	158		
Future Development	72	Melody Ranch agreement	
Total Potential Dwellings	607		

Calculations		
Existing Wastewater Flow/Dwelling	306	gpd
Plan Wastewater Flow/Dwelling	250	gpd
Current % build out	60%	
Total WW Flow (Ave Day, Peak Month)	151,625	gpd
Total WW Flow (Peak Day, Peak Month)	181,950	gpd

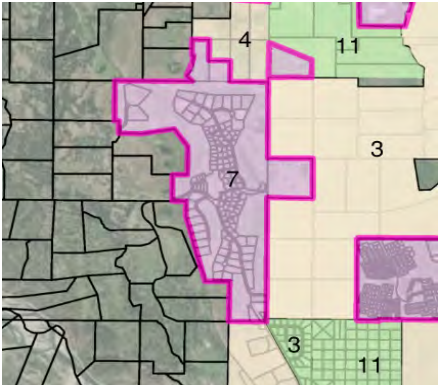


Town of Jackson WY
 Development Projections
 Three Creek Ranch
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Three Creek Ranch	30,908	43,560	46,283	49,005	51,728	54,450
% Built Out	62%	80%	85%	90%	95%	100%

Parameter	Value	Source	Notes
Zoning	PUD R-3	County GIS	
Total Residential Parcels	112	county GIS	
Existing Single-Family	112		
Existing Multi-Family	0	visual count	
Vacant Single Family	9	visual count	
Vacant Multi-Family	0	visual count	
ARUs Percentage	50	Assumption	
ARU Potential	61		
Total Potential Dwellings	182		

Calculations		
Existing Wastewater Flow/Dwelling	276	gpd
Plan Wastewater Flow/Dwelling	250	gpd
Current % build out	62%	
Total WW Flow (Ave Day, Peak Month)	45,375	gpd
Total WW Flow (Peak Day, Peak Month)	54,450	gpd



Town of Jackson WY
 Development Projections
 Rafter J ISD
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Rafter J ISD	118,244	176,970	187,380	197,790	208,200	208,200
% Built Out	71%	85%	90%	95%	100%	100%

Parameter	Value	Source
Zoning	PUD R-3	County GIS
Total Residential Parcels	491	from GIS
Existing Single-Family	403	
Existing Multi-Family	88	visual count
Vacant Single Family	1	
Vacant Multi-Family	0	
ARUs Percentage	50	Assumption
ARU Potential	202	
Total Potential Dwellings	694	

Calculations		
Existing Wastewater Flow/Dwelling	241	gpd
Plan Wastewater Flow/Dwelling	250	gpd
Current % build out	71%	
Total WW Flow (Ave Day, Peak Month)	173,500	gpd
Total WW Flow (Peak Day, Peak Month)	208,200	gpd

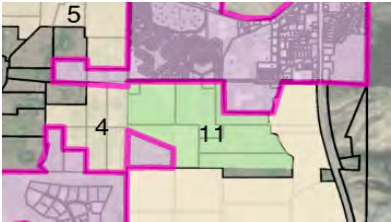


Town of Jackson WY
 Development Projections
 North South Park and CN-PRD
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
North South Park and CN-PRD	0	19,459	48,646	68,105	107,022	194,585
% Built Out	0%	10%	25%	35%	55%	100%

Parameter	Value	Source	Notes
Total R-1 Zoning Parcels	8	from GIS	
Total S Zoning Parcels	84	from GIS	
CN-PRD Units	570		

Calculations			
Plan Wastewater Flow/Dwelling	250	gpd	
R1 Zoning Parcels	2,000	gpd	
S Zoning Parcels	21,000	gpd	
CN-PRD Units	142,500	gpd	
ARUs (2 allowed per parcel, 50% built)	2,000	gpd	R-1
Total WW Flow (Ave Day, Peak Month)	167,500	gpd	
Total WW Flow (Peak Day, Peak Month)	201,000	gpd	
WQMP, Attachment E-3	194,585	gpd	



Town of Jackson WY
 Development Projections
 Flat Creek and Elk Refuge Inns
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Flat Creek and Elk Refuge Inns	0	19,726	22,544	25,362	28,180	28,180
% Built Out	0%	70%	80%	90%	100%	100%

Parameter	Value	Source	Notes
Zoning	R-3, BC-TC	County GIS	

<i>Current</i>			
Flat Creek Inn (gpd)	7,884	Jorgensen Submittal to Town, 5/12/25	
Elk Refuge Inn (gpd)	3,336	Jorgensen Submittal to Town, 5/12/25	

<i>Future</i>			
Total Residential Parcels	11	Jorgensen Submittal to Town, 5/12/25	
Existing Single-Family	7	Jorgensen Submittal to Town, 5/12/25	
Vacant Single Family	4	Jorgensen Submittal to Town, 5/12/25	
Flow per Dwelling (gpd)	282	Jorgensen Submittal to Town, 5/12/25	
Flat Creek Inn- Future (gpd)	1,146	Jorgensen Submittal to Town, 5/12/25	
Museum-Future	1,170	Jorgensen Submittal to Town, 5/12/25	

Calculations		
Current Inns	11,220	gpd
Future Residential Flow	3,102	gpd
Future Inns and Museum	2,316	gpd
Total WW Flow (Ave Day, Peak Month)	16,638	gpd
Total WW Flow (Peak Day, Peak Month)	28,180	gpd

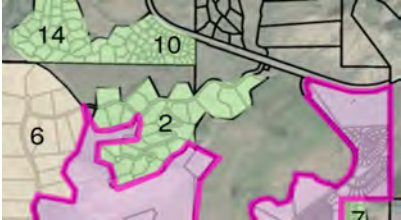


Town of Jackson WY
Development Projections
Indian Springs Ranch
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Indian Springs Ranch	5,500	15,840	19,800	23,760	26,400	26,400
% Built Out	35%	60%	75%	90%	100%	100%

Parameter	Value	Source	Notes
Zoning	PUD R-3	County GIS	
Total Residential Parcels	31		
Existing Single-Family	22	WQMP, Attachment E-3	
Vacant Single Family	9	WQMP, Attachment E-3	
ARUs Percentage	100	Assumption	can already see ARUs on some properties
ARU Potential	31		
Total Potential Dwellings	62		
Flow per Dwelling	250	Assumption	

Calculations			
Estimated Current Total Flow	5,500	gpd	
Current % build out	35%		
Total WW Flow (Ave Day, Peak Month)	15,500	gpd	
Total WW Flow (Peak Day, Peak Month)	18,600	gpd	
Total WW Flow (Peak Day, Peak Month)	26,400	gpd	Town Provided

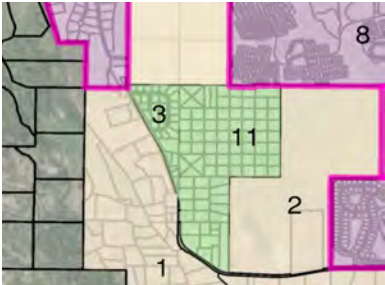


Town of Jackson WY
 Development Projections
 North Meadow Subdivision
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
North Meadow Subdivision	0	10,800	18,360	21,600	21,600	21,600
% Built Out	0%	50%	85%	100%	100%	100%

Parameter	Value	Source	Notes
Zoning	R-3	County GIS	
Total Residential Parcels	48	WQMP, Attachment E-3	
Existing Single-Family	46	WQMP, Attachment E-3	
Vacant Single Family	2	WQMP, Attachment E-3	
Exisiting ARUs	14	visual count	Appears to be ARUs on some properties
ARUs Percentage	50	Assumption	
ARU Potential	10	There are already parcels that appear to have ARUs, further ARUs counted as "potential"	
Total Potential Dwellings	72		
Flow per Dwelling (gal)	250	Assumption	

Calculations		
Estimated Total Current WW Flow	15,000	gpd
Current % build out	83%	
Total WW Flow (Ave Day, Peak Month)	18,000	gpd
Total WW Flow (Peak Day, Peak Month)	21,600	gpd

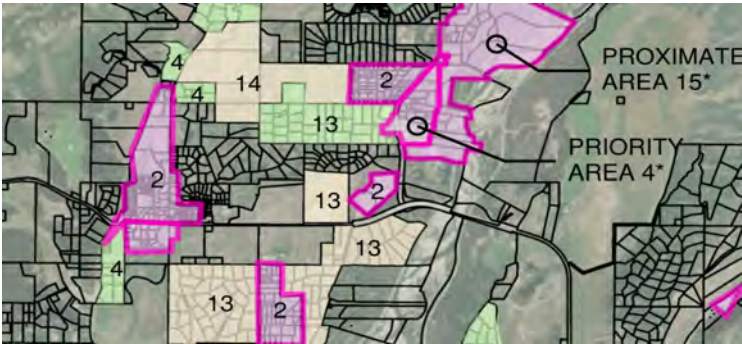


Town of Jackson WY
 Development Projections
 Wilson Sewer Phase IV
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Wilson Sewer Phase IV	0	6,750	8,100	10,800	12,150	13,500
% Built Out	0%	50%	60%	80%	90%	100%

Parameter	Value	Source	Notes
Existing R-3 Zoning Parcels	21	WQMP, Attachment E-3	
Vacant R-3 Zoning Parcels	3	WQMP, Attachment E-3	
ARUs Percentage	100	Assumption	
ARU Potential	24		
Total Potential Dwellings	45		
Flow per Dwelling (gal)	250	Assumption	

Calculations		
Estimated Total Current WW Flow	5,250	gpd
Current % build out	0%	
Total WW Flow (Ave Day, Peak Month)	11,250	gpd
Total WW Flow (Peak Day, Peak Month)	13,500	gpd



Town of Jackson WY
 Development Projections
 Adams Canyon
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Adams Canyon	38,868	42,660	45,030	47,400	47,400	47,400
% Built Out	82%	90%	95%	100%	100%	100%

Parameter	Value	Source
Existing R-2 Zoning Parcels	12	from GIS
Vacant R-2	2	from GIS
Existing NC-TC Zoning Parcels	19	from GIS
Vacant NC-TC	1	from GIS
Existing BP-TC Zoning Parcels	46	from GIS
Vacant BP-TC	0	from GIS
ARUs Percentage	100	Assumption- R-2
ARU Potential	14	
Total Potential Units	94	
Flow per Residential Unit (gal)	250	Assumption
Flow per Commercial Unit (gal)	500	Assumption

Calculations		
Estimated Total Current WW Flow	32,500	gpd
Current % build out	82%	
Total WW Flow (Ave Day, Peak Month)	39,500	gpd
Total WW Flow (Peak Day, Peak Month)	47,400	gpd



Town of Jackson WY
 Development Projections
 Fish Creek Parcels
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Fish Creek Parcels	0	7,425	11,250	13,500	15,750	22,500
% Built Out	0%	33%	50%	60%	70%	100%

Parameter	Value	Source	Notes
Total R-1 Zoning Parcels	2	from GIS	
Total R-2 Zoning Parcels	17	from GIS	
Total PUD R-2 Zoning Parcels	6	from GIS	
ARU Percentage	100	Assumption- 2 per parcel)	
ARU Potential	50		
Total Potential Dwellings	75		
Flow per Dwelling (gal)	250	Assumption	

Calculations		
Estimated Total Current WW Flow	6,250	gpd
Current % build out	33%	
Total WW Flow (Ave Day, Peak Month)	18,750	gpd
Total WW Flow (Peak Day, Peak Month)	22,500	gpd

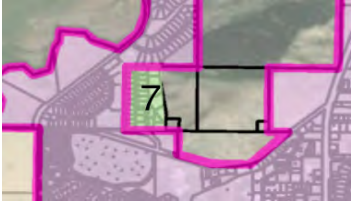


Town of Jackson WY
Development Projections
Hi Country Subdivision
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Hi Country Subdivision	0	9,450	11,025	12,600	14,175	15,750
% Built Out	0%	60%	70%	80%	90%	100%

Parameter	Value	Source	Notes
Zoning	R-3	County GIS	
Total Residential Parcels	35		
Existing Single-Family	31	WQMP, Attachment E-3	
Vacant Single Family	4	WQMP, Attachment E-3	
ARUs Percentage	50	Assumption	Can see ARUs on some properties currently
ARU Potential	18		
Total Potential Dwellings	53		
Flow per Dwelling	250	Assumption	

Calculations		
Estimated Current Total Flow	7,750	gpd
Current % build out	59%	
Total WW Flow (Ave Day, Peak Month)	13,125	gpd
Total WW Flow (Peak Day, Peak Month)	15,750	gpd

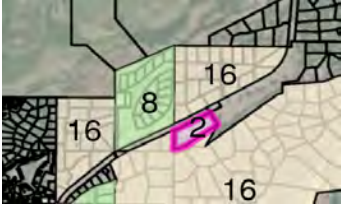


Town of Jackson WY
 Development Projections
 Lake Creek Acres
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Lake Creek Acres	0	6,750	9,750	11,250	12,750	15,000
% Built Out	0%	45%	65%	75%	85%	100%

Parameter	Value	Source	Notes
Zoning	R-3	County GIS	
Total Residential Parcels	25		
Existing Single-Family	21	WQMP, Attachment E-3	
Vacant Single Family	4	WQMP, Attachment E-3	
ARUs Percentage	100	Assumption	can see ARUs on some properties
ARU Potential	25		
Total Potential Dwellings	50		
Flow per Dwelling	250	Assumption	

Calculations		
Estimated Current Total Flow	5,250	gpd
Current % build out	42%	
Total WW Flow (Ave Day, Peak Month)	12,500	gpd
Total WW Flow (Peak Day, Peak Month)	15,000	gpd

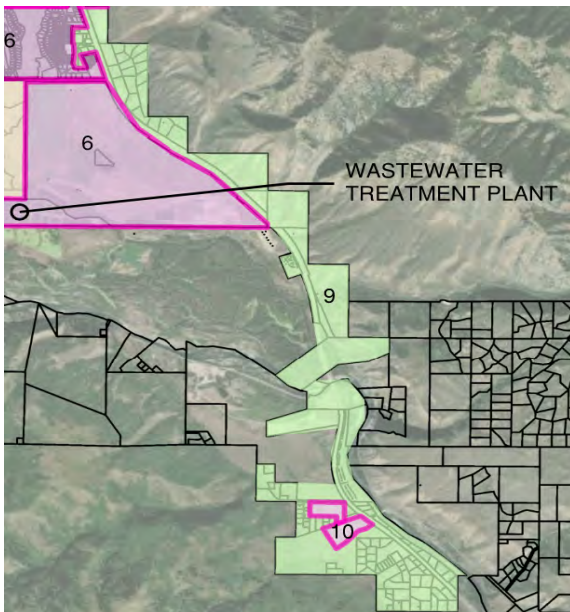


Town of Jackson WY
Development Projections
MMES, WYDOT, Teton County
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
MMES, WYDOT, Teton County	36,840	75,621	113,432	136,118	151,242	151,242
% Built Out	24%	50%	75%	90%	100%	100%

Parameter	Value	Source
Total NC Zoning Parcels	12	from GIS
Total WHP Zoning Parcels	70	from GIS
Total R-2 Zoning Parcels	9	from GIS
Total R-1 Zoning Parcels	3	from GIS
Total BP Zoning Parcels	15	from GIS
Total R-3 Zoning Parcels	19	from GIS
Total R-3 PUD Zoning Parcels	22	from GIS
Existing Cabins BC Zoning	54	visual count, 140 gpd/unit
Existing Mobile Park MHP Zoning	72	visual count, 250 gpd/unit
Existing Landfill	500	estimate, staff use
Existing School, WY DOT	10,000	gpd, WQMP
Existing Rec Area	2,600	200 visitors/day, 13 gpd/person
Vacant NC	0	
Vacant WHP (acreage)	84	acres, 3 units/3 acres
Vacant WHP	15	
Vacant R-2	3	
Vacant BP	2	
Vacant R-1	3	
Vacant R-3	1	

Calculations		
Existing Cabins BC Zoning	7,560	gpd
Existing Mobile Park MHP Zoning	18,000	gpd
NC	3,000	gpd
WHP (acreage)	21,000	gpd
WHP	21,250	gpd
R-2	9,000	gpd
R-1	4,500	gpd
R-3	4,750	gpd
BP	4,250	gpd
ARUs (assume 50% of residential)	19,625	gpd
Subtotal	112,935	gpd
Existing School, WY DOT	10,000	gpd
Existing Landfill	500	gpd
Existing Rec Area	2,600	gpd
Total WW Flow (Ave Day, Peak Month)	126,035	gpd
Total WW Flow (Peak Day, Peak Month)	151,242	gpd

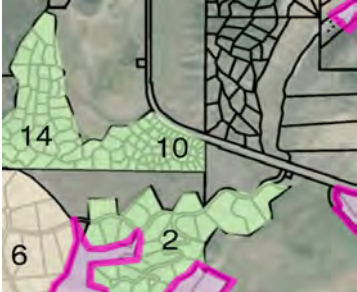


Town of Jackson WY
 Development Projections
 Skyline Ranch 1 Subdivision
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Skyline Ranch 1 Subdivision	0	15,120	17,640	20,160	22,680	25,200
% Built Out	0%	60%	70%	80%	90%	100%

Parameter	Value	Source	Notes
Zoning	R-3	County GIS	
Total Residential Parcels	56		
Existing Single-Family	52	WQMP, Attachment E-3	
Vacant Single Family	4	WQMP, Attachment E-3	
ARUs Percentage	50	Assumption	can see ARUs on some properties
ARU Potential	28		
Total Potential Dwellings	84		
Flow per Dwelling	250	Assumption	

Calculations			
Estimated Current Total Flow	13,000	gpd	
Current % build out	62%		
Total WW Flow (Ave Day, Peak Month)	21,000	gpd	
Total WW Flow (Peak Day, Peak Month)	25,200	gpd	

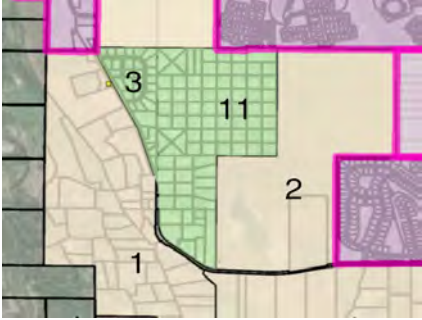


Town of Jackson WY
 Development Projections
 South Park Ranches
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
South Park Ranches	0	12,150	16,200	20,250	24,300	40,500
% Built Out	0%	30%	40%	50%	60%	100%

Parameter	Value	Source	Notes
Zoning	R-3	County GIS	
Total Residential Parcels	90		
Existing Single-Family	83	WQMP, Attachment E-3	
Vacant Single Family	7	WQMP, Attachment E-3	
ARUs Percentage	50	Assumption	
ARU Potential	45		
Total Potential Dwellings	135		
Flow per Dwelling	250	Assumption	

Calculations			
Estimated Current Total Flow	20,750	gpd	
Current % build out	61%		
Total WW Flow (Ave Day, Peak Month)	33,750	gpd	
Total WW Flow (Peak Day, Peak Month)	40,500	gpd	

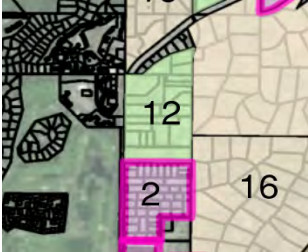


Town of Jackson WY
 Development Projections
 West Bank Parcels
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
West Bank Parcels	0	6,720	8,400	10,080	11,760	16,800
% Built Out	0%	40%	50%	60%	70%	100%

Parameter	Value	Source	Notes
Zoning	NR-1	County GIS	
Total Single-Family Parcels	28		
Existing Single-Family	22	WQMP, Attachment E-3	
Vacant Single Family	6	WQMP, Attachment E-3	
ARUs Percentage	100	Assumption	
ARU Potential	28		
Total Potential Dwellings	56		
Flow per Dwelling	250	Assumption	

Calculations		
Estimated Current Total Flow	5,500	gpd
Current % build out	39%	
Total WW Flow (Ave Day, Peak Month)	14,000	gpd
Total WW Flow (Peak Day, Peak Month)	16,800	gpd

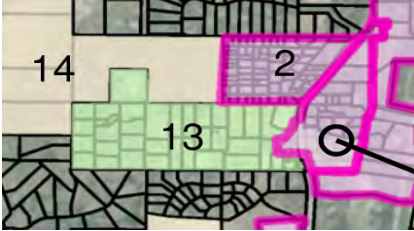


Town of Jackson WY
 Development Projections
 Nethercott Ln Parcels
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Nethercott Ln Parcels	0	0	6,960	13,920	17,400	17,400
% Built Out	0%	0%	40%	80%	100%	100%

Parameter	Value	Source	Notes
Zoning	R-3	County GIS	
Total Single-Family Parcels	29		
Existing Single-Family	24	WQMP, Attachment E-3	
Vacant Single Family	5	WQMP, Attachment E-3	
ARUs Percentage	100	Assumption	
ARU Potential	29		
Total Potential Dwellings	58		
Flow per Dwelling	250	Assumption	

Calculations			
Estimated Current Total Flow	6,000	gpd	
Current % build out	41%		
Total WW Flow (Ave Day, Peak Month)	14,500	gpd	
Total WW Flow (Peak Day, Peak Month)	17,400	gpd	

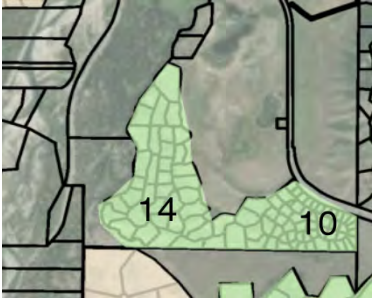


Town of Jackson WY
 Development Projections
 Skyline Ranch 2 Subdivision
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Skyline Ranch 2 Subdivision	0	0	11,340	18,900	18,900	18,900
% Built Out	0%	0%	60%	100%	100%	100%

Parameter	Value	Source	Notes
Zoning	R-3	County GIS	
Total Residential Parcels	42		
Existing Single-Family	38	WQMP, Attachment E-3	
Vacant Single Family	4	WQMP, Attachment E-3	
ARUs Percentage	50	Assumption	can already see ARUs on some properties
ARU Potential	21		
Total Potential Dwellings	63		
Flow per Dwelling	250	Assumption	No current Data

Calculations		
Estimated Current Total Flow	9,500	gpd
Current % build out	60%	
Total WW Flow (Ave Day, Peak Month)	15,750	gpd
Total WW Flow (Peak Day, Peak Month)	18,900	gpd

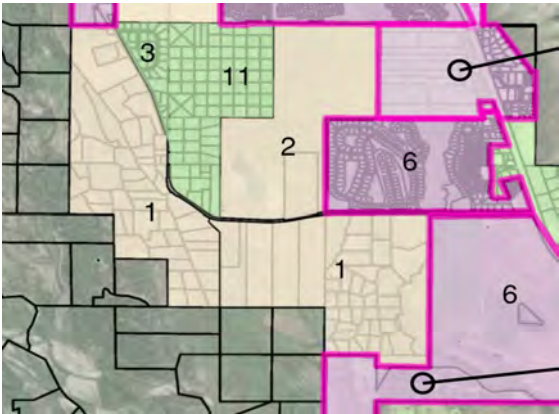


Town of Jackson WY
 Development Projections
 Proximate Area 1
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 1	0	13,688	27,375	38,325	43,800	54,750
% Built Out	0%	25%	50%	70%	80%	100%

Parameter	Value	Source
Total R1 Zoning Parcels	5	from GIS
Total R2 Zoning Parcels	66	from GIS
Total R3 Zoning Parcels	27	from GIS

Calculations			
R1 Zoning Parcels	1,250	gpd	
R2 Zoning Parcels	16,500	gpd	
R3 Zoning Parcels	6,750	gpd	
ARUs (2 allowed per parcel, 50% built)	17,750	gpd	R1, R2
ARUs (1 allowed per parcel, 50% built)	3,375	gpd	R3
Total WW Flow (Ave Day, Peak Month)	45,625	gpd	
Total WW Flow (Peak Day, Peak Month)	54,750	gpd	Factor of 1.2



Town of Jackson WY
 Development Projections
 Proximate Area 2
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 2	0	0	1,620	4,050	6,480	8,100
% Built Out	0%	0%	20%	50%	80%	100%

Parameter	Value	Source
Total R1 Zoning Acreage	305	from GIS
Total R1 Zoning Parcels	9	1/35 acres

Calculations		
R1 Zoning Parcels	2,250	gpd
ARUs (2 allowed per parcel, 100% built)	4,500	gpd
Total WW Flow (Ave Day, Peak Month)	6,750	gpd
Total WW Flow (Peak Day, Peak Month)	8,100	gpd

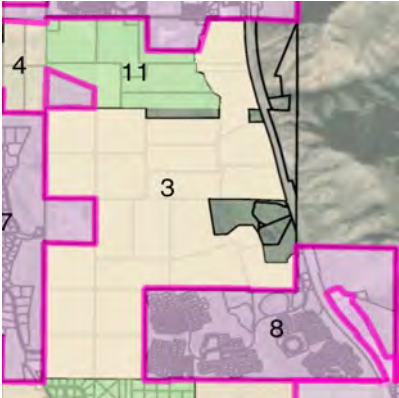


Town of Jackson WY
 Development Projections
 Proximate Area 3
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 3	0	2,070	8,280	14,490	16,560	20,700
% Built Out	0%	10%	40%	70%	80%	100%

Parameter	Value	Source
Total R1 Zoning Parcels	23	from GIS

Calculations		
R1 Zoning Parcels	5,750	gpd
ARUs (2 allowed per parcel, 100% built)	11,500	gpd
Total WW Flow (Ave Day, Peak Month)	17,250	gpd
Total WW Flow (Peak Day, Peak Month)	20,700	gpd

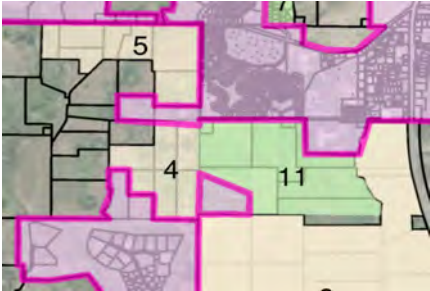


Town of Jackson WY
Development Projections
Proximal Area 4
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximal Area 4	0	0	720	1,080	1,800	3,600
% Built Out	0%	0%	20%	30%	50%	100%

Parameter	Value	Source
Total PUD R2 Zoning Parcels	6	from GIS

Calculations		
PUD R2 Zoning Parcels	1,500	gpd
ARUs (2 allowed per parcel, 50% built)	1,500	gpd
Total WW Flow (Ave Day, Peak Month)	3,000	gpd
Total WW Flow (Peak Day, Peak Month)	3,600	gpd

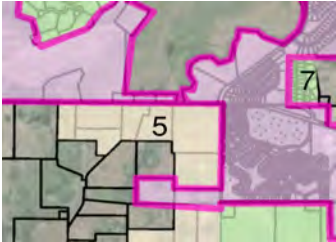


Town of Jackson WY
 Development Projections
 Proximate Area 5
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 5	0	0	840	1,260	2,100	4,200
% Built Out	0%	0%	20%	30%	50%	100%

Parameter	Value	Source
Total PUD R2 Zoning Parcels	7	from GIS

Calculations		
PUD R2 Zoning Parcels	1,750	gpd
ARUs (2 allowed per parcel, 50% built)	1,750	gpd
Total WW Flow (Ave Day, Peak Month)	3,500	gpd
Total WW Flow (Peak Day, Peak Month)	4,200	gpd

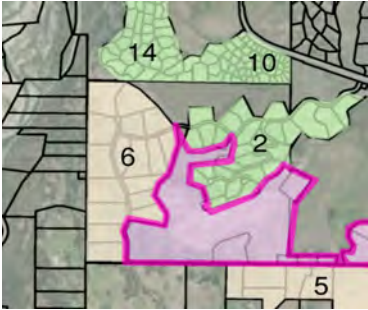


Town of Jackson WY
 Development Projections
 Proximate Area 6
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 6	0	2,040	4,080	6,120	8,160	10,200
% Built Out	0%	20%	40%	60%	80%	100%

Parameter	Value	Source
Total PUD R2 Zoning Parcels	17	from GIS

Calculations		
PUD R2 Zoning Parcels	4,250	gpd
ARUs (2 allowed per parcel, 50% built)	4,250	gpd
Total WW Flow (Ave Day, Peak Month)	8,500	gpd
Total WW Flow (Peak Day, Peak Month)	10,200	gpd

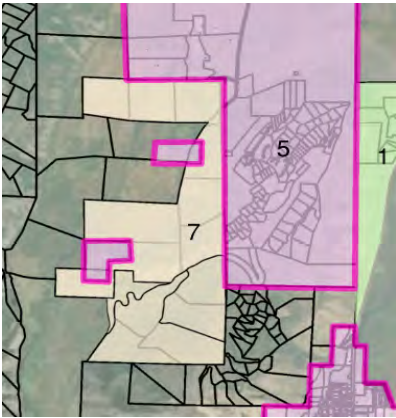


Town of Jackson WY
Development Projections
Proximate Area 7
Wastewater Flows

Wastewater Contributor	2026	2031	2036	2041	2046	2080
	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 7	0	0	2,700	5,400	8,100	13,500
% Built Out	0%	0%	20%	40%	60%	80%

Parameter	Value	Source
Total R1 Zoning Parcels	12	from GIS
Total R2 Zoning Parcels	3	from GIS

Calculations		
R1 Zoning Parcels	3,000	gpd
R2 Zoning Parcels	750	
ARUs (2 allowed per parcel, 100% built)	7,500	gpd
Total WW Flow (Ave Day, Peak Month)	11,250	gpd
Total WW Flow (Peak Day, Peak Month)	13,500	gpd

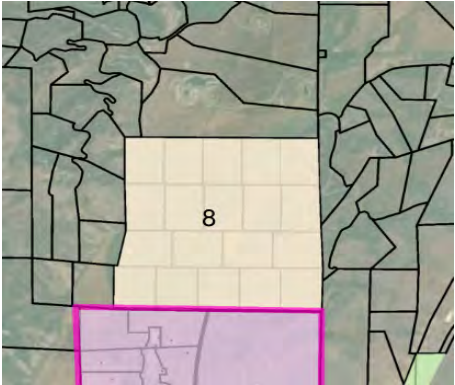


Town of Jackson WY
 Development Projections
 Proximate Area 8
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 8	0	0	3,420	8,550	13,680	17,100
% Built Out	0%	0%	20%	50%	80%	100%

Parameter	Value	Source
Total R1 Zoning Parcels	19	from GIS

Calculations		
R1 Zoning Parcels	4,750	gpd
ARUs (2 allowed per parcel, 100% built)	9,500	gpd
Total WW Flow (Ave Day, Peak Month)	14,250	gpd
Total WW Flow (Peak Day, Peak Month)	17,100	gpd

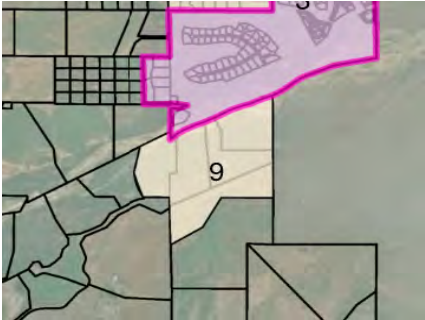


Town of Jackson WY
Development Projections
Proximate Area 9
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 9	0	0	900	2,250	3,600	4,500
% Built Out	0%	0%	20%	50%	80%	100%

Parameter	Value	Source
Total R1 Zoning Parcels	5	from GIS

Calculations		
R1 Zoning Parcels	1,250	gpd
ARUs (2 allowed per parcel, 100% built)	2,500	gpd
Total WW Flow (Ave Day, Peak Month)	3,750	gpd
Total WW Flow (Peak Day, Peak Month)	4,500	gpd



Town of Jackson WY
 Development Projections
 Proximate Area 10
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 10	0	0	0	0	32,100	64,200
% Built Out	0%	0%	0%	0%	50%	100%

Parameter	Value	Source
Total R3 Zoning Parcels	39	from GIS
Total PUD R3 Zoning Parcels	68	from GIS

Calculations		
R3 Zoning Parcels	9,750	gpd
PUD R3 Zoning Parcels	17,000	gpd
ARUs (1 allowed per parcel, 50% built)	26,750	gpd
Total WW Flow (Ave Day, Peak Month)	53,500	gpd
Total WW Flow (Peak Day, Peak Month)	64,200	gpd



Town of Jackson WY
Development Projections
Proximate Area 11
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 11	0	0	0	0	34,200	68,400
% Built Out	0%	0%	0%	0%	50%	100%

Parameter	Value	Source
Total R-3 Zoning Parcels	114	from GIS

Calculations		
R-3 Zoning Parcels	28,500	gpd
ARUs (1 allowed per parcel, 50% built)	28,500	gpd
Total WW Flow (Ave Day, Peak Month)	57,000	gpd
Total WW Flow (Peak Day, Peak Month)	68,400	gpd

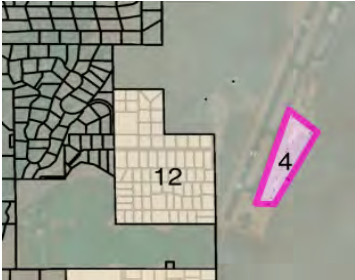


Town of Jackson WY
Development Projections
Proximate Area 12
Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 12	0	0	0	0	21,300	42,600
% Built Out	0%	0%	0%	0%	50%	100%

Parameter	Value	Source
Total R-3 Zoning Parcels	71	from GIS

Calculations		
R3 Zoning Parcels	17,750	gpd
ARUs (1 allowed per parcel, 50% built)	17,750	gpd
Total WW Flow (Ave Day, Peak Month)	35,500	gpd
Total WW Flow (Peak Day, Peak Month)	42,600	gpd

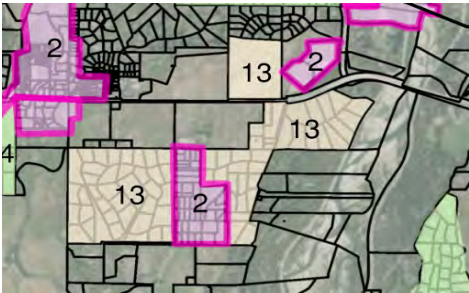


Town of Jackson WY
 Development Projections
 Proximate Area 13
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 13	0	6,840	13,680	23,940	27,360	34,200
% Built Out	0%	20%	40%	70%	80%	100%

Parameter	Value	Source
Total R-2 Zoning Parcels	3	from GIS
Total R-3 Zoning Parcels	72	from GIS

Calculations		
R-2 Zoning Parcels	750	gpd
R-3 Zoning Parcels	18,000	gpd
ARUs (2 allowed per parcel, 50% built)	750	gpd
ARUs (1 allowed per parcel, 50% built)	9,000	gpd
Total WW Flow (Ave Day, Peak Month)	28,500	gpd
Total WW Flow (Peak Day, Peak Month)	34,200	gpd



Town of Jackson WY
 Development Projections
 Proximate Area 14
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 14	0	900	1,800	3,150	3,600	4,500
% Built Out	0%	20%	40%	70%	80%	100%

Parameter	Value	Source
Total R-1 Zoning Parcels	2	from GIS
Total R-2 Zoning Parcels	3	from GIS

Calculations		
R-1 Zoning Parcels	500	gpd
R-2 Zoning Parcels	750	gpd
ARUs (2 allowed per parcel, 100% built)	2,500	gpd
Total WW Flow (Ave Day, Peak Month)	3,750	gpd
Total WW Flow (Peak Day, Peak Month)	4,500	gpd

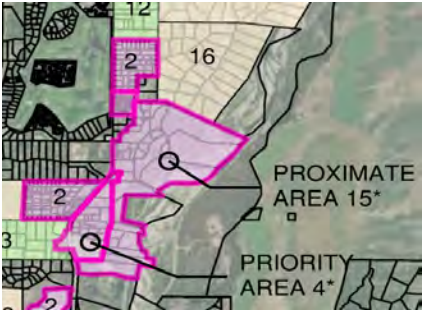


Town of Jackson WY
 Development Projections
 Proximate Area 15
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 15	3,000	6,000	7,500	12,000	12,000	15,000
% Built Out	20%	40%	50%	80%	80%	100%

Parameter	Value	Source
Total R-1 Zoning Parcels	2	from GIS
Total R-2 Zoning Parcels	5	from GIS
Total R-3 Zoning Parcels	24	from GIS

Calculations			
R-1 Zoning Parcels	500	gpd	
R-2 Zoning Parcels	1,250	gpd	
R-3 Zoning Parcels	6,000	gpd	
ARUs (2 allowed per parcel, 50% built)	1,750	gpd	R1, R2
ARUs (1 allowed per parcel, 50% built)	3,000	gpd	R3
Total WW Flow (Ave Day, Peak Month)	12,500	gpd	
Total WW Flow (Peak Day, Peak Month)	15,000	gpd	

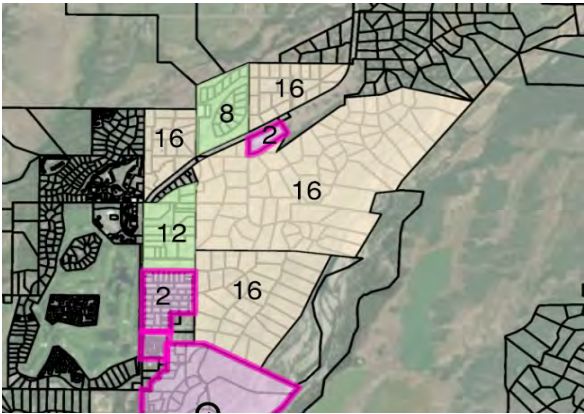


Town of Jackson WY
 Development Projections
 Proximate Area 16
 Wastewater Flows

	2026	2031	2036	2041	2046	2080
Wastewater Contributor	Flow (gpd)	Flow (gpd)	Flow (gpd)	Flow (gpd)*	Flow (gpd)*	Flow (gpd)
Proximate Area 16	0	18,360	30,600	42,840	48,960	61,200
% Built Out	0%	30%	50%	70%	80%	100%

Parameter	Value	Source
Total R-2 Zoning Parcels	129	from GIS
Total NR-1 Zoning Parcels	7	from GIS

Calculations			
R2 Zoning Parcels	32,250	gpd	
NR-1 Zoning Parcels	1,750	gpd	
ARUs (2 allowed per parcel, 50% built)	16,125	gpd	R-2
ARUs (1 allowed per parcel, 50% built)	875	gpd	NR-1
Total WW Flow (Ave Day, Peak Month)	51,000	gpd	
Total WW Flow (Peak Day, Peak Month)	61,200	gpd	



APPENDIX C – 2024 WYPDES Statement of Basis and Permit

**Wyoming Department of Environmental Quality
Water Quality Division
WYPDES (Wyoming Pollutant Discharge Elimination System) Program**

STATEMENT OF BASIS

Renewal

APPLICANT NAME: Jackson, Town of

MAILING ADDRESS: PO Box 1687
Jackson, WY 83001

FACILITY LOCATION: Jackson Wastewater Lagoon, located in the SWNW, Section 29, Township 41 North, Range 116 West, Teton County. Effluent discharge is to the Snake River (2AB) via a barrow pond (3B) near the outfall, then a series of constructed wetlands (3B), then Goose Creek (3B), a local spring that is a tributary to the Snake River. Water from the constructed wetlands can also bypass Goose Creek and flow directly to the Snake River through a pipeline operated by the Wyoming Game and Fish Department.

PERMIT NUMBER: WY0021458

This permit was revised following its public notice period, to incorporate necessary clarifications and corrections as follows:

- 1) Add diagram to outline discharge flow path and monitoring points.***
- 2) Update receiving water descriptions throughout, based on details provided by permittee and the Wyoming Game and Fish Department.***
- 3) Add details for reasonable potential analysis regarding ammonia numeric and narrative criteria.***
- 4) Add details on mixing zone within Snake River.***
- 5) Add details regarding conveyance losses through the effluent flow path.***
- 6) Add Total Nitrogen to outfall sampling.***
- 7) Change outfall nutrient sampling frequency from annual to quarterly. This aligns with the quarterly sampling to be done at instream monitoring points.***
- 8) Add start date of July 1, 2025 for quarterly instream monitoring.***

This permit has been renewed in accordance with current WYPDES permitting requirements. All permit effluent limits and monitoring requirements have been updated in accordance with current WDEQ regulations and policy. Specific changes to the permit include the following. All changes can also be found in Part I, Tables A and B of the permit.

- 1. Add 5 instream monitoring locations: UFC and DFC on Flat Creek, upstream and downstream of this facility; BHR at outlet of "Blue Heron Reservoir" (a constructed wetland that receives effluent from this facility and drains to the Snake River; SR1 on Snake River at mouth of Goose Creek; SR2 on Snake River at downstream end of receiving braid. These locations will be sampled for nutrients and ammonia.***

2. *Update waste load allocation calculations and water-quality-based effluent limits based upon instream data from USGS station 13013650- Snake River at Moose, WY', which is located upstream of this facility.*
3. *Update technology-based effluent limits for carbonaceous biochemical oxygen demand (CBOD5) and total suspended solids (TSS) based upon current state water quality rules and federal effluent limit guidelines.*
4. *Sampling frequency is increased from monthly to weekly for temperature and oil and grease.*
5. *Sampling frequency at outfall 001 (facility wastewater) is increased from annual to quarterly for nutrients.*
6. *This permit contains many minor language, grammar and formatting changes in the interests of brevity and clarity.*
7. *The Annual Metals monitoring requirements previously contained in Part III.B.f of the permit have been removed. This data had previously been requested by EPA Region 8 to conduct effluent screening for their pretreatment program. However, EPA now intends to conduct industrial user screening through a different process.*

Facility Description

The wastewater treatment facility serving the Town of Jackson includes a preliminary treatment building, an intermediate pumping facility, an ultraviolet disinfection facility, three backup power sources, ten (10) lagoon cells, and three photovoltaic solar systems.

Once influent enters the facility, it is mechanically screened and pumped to one of two preliminary parallel lagoons (cells 1 and 2), on a 50-50 split. After circulating through the preliminary cells, wastewater flows through several cells operated in series in the following order – 3A, 3B1, 3B2, 4A, 4B, 4C, 4D, and 5. According to design records for this facility, cells 1 and 2 are lined with bentonite clay, while the remaining 8 cells are lined with a geosynthetic liner (bentonite plus fabric membrane). Cell mixing occurs through the use of floating aerators (cells 1 – 3B2) and subsurface coarse aeration (cells 4A-5).

Once wastewater exits cell 5, it is pumped through the IPS facility to the UV disinfection facility, where UV light disinfection occurs. Once disinfected, treated effluent then flows through outfall 001 to the Barrow Pond (class 3B), followed by four constructed wetland ponds operated in series and managed by the Wyoming Game and Fish Department. Normally, the wetland ponds are utilized year-round. The wetland ponds can be bypassed in the event maintenance is needed. Treated effluent can exit the wetland ponds in two locations (see flow diagram). The primary route is through a pipeline to the Snake River. A small amount of flow also occurs from “Blue Heron Reservoir,” the westernmost wetland pond in the series. From this pond, water enters “Goose Creek,” a small tributary of the Snake River, and within a short distance, the Snake River proper. The facility is equipped with multiple bypasses. Any cell or pond can be bypassed in the event of an emergency or for needed maintenance.

The facility is equipped with the following redundancies:

- The headworks has a manual bar screen that can be deployed in the event the automatic bar screen fails.
- The facility has five (5) replacement raw wastewater pumps on hand in the event of pump failure.
- The IPS building has four (4) replacement pumps available at all times.
- The UV treatment building has 6 UV bank units (3 per channel), that can treat up to 10 MGD if needed.
- There are three (3) SCADA systems on-site. All SCADA systems are equipped with backup UPS batteries.

The facility has a maximum design flow of 5.0 MGD. However, the actual maximum effluent flow reported by the facility is 3.66 MGD.

The town of Jackson’s permanent population is 10,849 (2020, US Census Bureau). The town of Jackson and the surrounding developed areas are highly influenced by visitation through tourism. The town and its infrastructure serve two primary tourist seasons, summer and winter, that may place additional demand on the wastewater treatment system beyond the base population noted above. In addition, this wastewater treatment facility serves some county users, located beyond the town limits of Jackson. Local planning is currently underway for additional county sewer connections. This wastewater treatment system has no significant industrial users at this time.

Outfall Location Information:

This facility discharges through a pipe that carries the treated effluent approximately 225 feet before discharge into a barrow pond. Outfall latitude, longitude, and legal description listed in this permit are at the physical discharge point into the barrow pond. For consistency in sampling and improved year-round access, effluent samples for outfall 001 are taken from plumbing within the UV building, after final treatment. Effluent chemistry is unchanged between the sample point and the physical outfall location into the barrow pond.

Receiving Waters:

The above described barrow pond (3B) flows into a series of constructed wetlands (3B) located between the facility and the Snake River. The wetlands lie immediately south of the facility, on property managed by the Wyoming Game and Fish Department (WGFD) as waterfowl habitat and elk feed grounds. The wetlands complex within the WGFD property is bounded by Flat Creek to the east and the Snake River floodplain to the south. From the constructed wetlands, a small portion of the water flows out of “Blue Heron Reservoir” (the westernmost constructed wetland) toward the Snake River (2AB) near the mouth of “Goose Creek” (3B) – a short spring which begins approximately $\frac{3}{4}$ of a mile northwest of the facility, near Runway Road in South Park. A larger portion of the water from the wetlands flows into a buried pipe that was installed in 2022, from the easternmost constructed wetland. This WGFD buried pipe conveys water directly from the constructed wetlands to the Snake River. Based on water management needs, WGFD controls water flow from both wetland outlets simultaneously. Flow can therefore vary over time through each. Both of these outlets eventually flow to the same braid of the Snake River, but intercept the river at different points. Their entry points are approximately 2,300 stream feet apart, along the Snake River. See flow diagram below. The general hydrology of the immediate receiving water area is low-gradient alluvium with shallow groundwater present, and dispersed sloughs.

Diagram of Discharge Flow and Area Monitoring Points – Town of Jackson Wastewater Treatment Plant



Effluent Conveyance Loss:

The net surface area of the above described barrow pond and constructed wetlands is approximately 63 acres. The net water loss to surface evaporation in this area of Wyoming is 40 inches per year, according to data from the Western Regional Climate Center. Therefore, after discharge, but prior to reaching the Snake River, an estimated net average loss of 210 acre-feet per year occurs from the effluent produced at this facility (approximately 0.2 MGD, or 4% of produced effluent). All effluent limits calculated for protection of the Snake River therefore use an adjusted discharge rate of 4.8 MGD rather than the full design flow of 5.0 MGD. This adjustment accounts for effluent conveyance losses through the flow path to the Snake River.

The permit establishes effluent limits for the end of pipe that are intended to be protective of all class 2AB designated uses defined in *Wyoming Water Quality Rules and Regulations, Chapter 1*. Class 2AB designated uses may include drinking water, game and non-game fish, fish consumption, aquatic life other than fish, recreation, agriculture, wildlife, industry and scenic value.

Effluent Limits:

In developing effluent limits, all federal and state regulations and standards are considered, and the most stringent requirements incorporated into the permit. Permit limits are either technology-based or water-quality-based, as described below.

1. **Technology-based effluent limits:** The permit requires immediate compliance with National Secondary Treatment Standards, Wyoming Water Quality Standards, and the effluent limits established in this permit.
 - a. Five-day carbonaceous biochemical oxygen demand (CBOD₅) concentrations shall not exceed 25 mg/L (monthly average) or 40 mg/L (weekly average). There shall be a minimum of 85% percent CBOD₅ removal between the raw influent and the discharged effluent. These limits are based upon National Secondary Treatment Standards.
 - b. Total Suspended Solids (TSS) concentrations shall not exceed 100 mg/L (monthly average). This facility has demonstrated an inability to meet Equivalent to Secondary monthly average TSS National Treatment Standards of 45 mg/L. Of 179 monthly average discharge self-monitoring TSS measurements, 9 (5%) were above 45 mg/L, the highest-reported measurement was 58.4 mg/L. This facility's main treatment process relies upon waste stabilization ponds (lagoons). Therefore, this facility qualifies for Wyoming's alternate state-specific TSS limits of 100 mg/L, monthly average. Wyoming's alternate state-specific monthly average TSS limits are consistent with provisions in Chapter 2, Appendix E of the Wyoming Water Quality Rules and Regulations, relating to new and existing publicly owned treatment works.
 - c. Effluent pH concentrations shall remain within the range of 6.0 to 9.0 standard units. Note that in this case, the water-quality based effluent limit of 6.5 to 9.0 standard units is more stringent, and therefore being established as this facility's pH effluent limit.
2. **Water-quality-based limits:** Water-quality-based limits are established to ensure receiving water quality protection. Expected contaminants in municipal wastewater include **pH, E. coli, ammonia, and total residual chlorine**. E. coli and total residual chlorine effluent limits are established equal to instream standards, assuming zero dilution because the receiving wetlands and barrow pond at this facility are located within the 'high use swim areas' zone as defined in *Wyoming Water Quality Rules and Regulations, Chapter 1*. A waste load allocation was used to calculate ammonia effluent limits protective of the eventual class 2AB receiving water, the Snake River. Class 3B waters have no numeric ammonia standards. The water-quality-based pH effluent limit of 6.5 to 9.0 standard units is being established as this facility's end-of-pipe pH effluent limit, and is based upon *Wyoming Water Quality Rules and Regulations, Chapter 1*. End-of-pipe effluent limits, sampling and reporting schedules, and required sample types being established in this permit renewal are summarized in **Table 1A**.

Table 1A: Summary of End-of-Pipe Effluent Limits, Required Reporting Units, Sampling and Reporting Schedules, and Required Sample Types, WY0021458*						
Limited Constituent and Required Reporting Units	Effluent Limits			Sampling Schedule	Reporting Schedule	Required Sample Type
	Monthly Average	Weekly Average	Daily Maximum			
Five-Day Carbonaceous Biochemical Oxygen Demand (CBOD ₅) mg/L, effluent	25	40	N/A	Weekly	Monthly	Grab
CBOD ₅ , mg/L, influent	Report	Report	N/A	Weekly	Monthly	Grab
CBOD ₅ , % Removal	85	N/A	N/A	Monthly	Monthly	Calculated
E. coli, colonies/100 mL, May-September	126	N/A	235	5 Times Monthly	Monthly	Daily Maximum (Grab) Monthly Average (Calculated)
E. coli, colonies/100 mL, October-April	630	N/A	630	5 Times Monthly	Monthly	Daily Maximum (Grab) Monthly Average (Calculated)
Effluent Discharge Duration, days/month	Report (g)	N/A	N/A	Daily	Monthly	Report
Effluent Flow Volume, MGD	5.0	N/A	N/A	Daily	Monthly	Continuous or Instantaneous
Oil and Grease, mg/L	N/A	N/A	10	Weekly	Monthly	Grab
pH, s.u.	All effluent sample pH measurements shall remain within the range of 6.5-9.0 standard units			Weekly	Monthly	Grab (Field Measurement)
Temperature, effluent, °C	Report	N/A	Report	Weekly	Report	Weekly
Total Residual Chlorine (mg/L)	0.011	N/A	0.019	Daily	Monthly	Daily Maximum (Grab), Monthly
Total Suspended Solids, mg/L, effluent	100	Report	Report	Weekly	Monthly	Daily Maximum (Grab) Monthly and Weekly Average (Calculated)
Total Suspended Solids, mg/L, influent	Report	Report	Report	Weekly	Monthly	Daily Maximum (Grab) Monthly and Weekly Average (Calculated)

Table 1A: Summary of End-of-Pipe Effluent Limits, Required Reporting Units, Sampling and Reporting Schedules, and Required Sample Types, WY0021458*

Limited Constituent and Required Reporting Units	Effluent Limits			Sampling Schedule	Reporting Schedule	Required Sample Type
	Monthly Average	Weekly Average	Daily Maximum			
Total Suspended Solids, % Removal	85%	N/A	N/A	Weekly	Monthly	Calculated
Ammonia as N, mg/L	Report	N/A	Report	Monthly	Monthly	Grab
Whole Effluent Toxicity (WET) Acute, Pass at 100% effluent	N/A	N/A	Pass	Quarterly	Quarterly	Grab
Dissolved Oxygen, mg/L	N/A	N/A	Report	Annually	Annually	Grab
Nitrogen, Total, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab
Nitrate/Nitrite, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab
Orthophosphate phosphorus, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab
Total Dissolved Solids	N/A	N/A	Report	Quarterly	Quarterly	Grab
Total Phosphorus, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab

*The effluent limits and other permit requirements presented in Table 1A are provided only as a summary. For more detailed information, see Part I, Table 1A of the permit.

- Mixing zone:** In accordance with Chapter 1, Section 9 of the Wyoming Water Quality Rules and Regulations, along with Section 4 of the Implementation Policies for Chapter 1, this permit establishes a mixing zone within the Snake River. At the points where the regulated effluent reaches the Snake River, the river is a braided bed system approximately 800 feet wide. At any given time, approximately 40-50% of the of the 800-foot-wide cross sectional area of the braided river system contains flowing water. Effluent from the facility enters a single outer braid of the river measuring approximately 35 feet wide. This braid is estimated to convey approximately 10% of the total flow of the Snake River through this local river reach. This estimate is based on channel width comparisons with the rest of the flowing water in this river reach. Effluent travels downstream for approximately 5,000 feet in this braid before converging with the rest of the Snake River at the downstream end of the Wyoming Game and Fish habitat management area. This river braid below the points of effluent entry constitutes the mixing zone for the effluent regulated under this permit. The rest of the Snake River (beyond this braid) constitutes the required zone of passage around the mixing zone. Within the mixing zone, all acute criteria for aquatic life, fish and drinking water protection must be met. Beyond the mixing zone, all chronic criteria must also be met. The permit establishes an end-of-pipe effluent limit for acute whole effluent toxicity (WET) in order to ensure that no acute lethality to aquatic organisms occurs within the mixing zone. In accordance with the above referenced water quality rules, the mixing zone established in this permit occupies less than 50% of the cross-sectional area of the Snake River at the effluent entry point, and its length is less than 10 times the width of the entire river.

- a. **Waste load allocation:** For facilities that ultimately discharge to a perennial water of the state, a waste load allocation (WLA) calculation is used to calculate site-specific ammonia effluent limits, because ammonia aquatic life toxicity is both temperature and pH-dependent. WLA-based limits are in part determined by available receiving water dilution. Using a mass-balance approach, maximum allowable ammonia effluent concentrations are calculated to prevent ammonia in-stream standard exceedances. Waste load allocation calculations of this type use the following data: 1) upstream receiving stream flow volumes, 2) upstream constituent concentrations, 3) the facility's maximum monthly design discharge volume, and 4) site-specific constituent in-stream standards to calculate maximum allowable effluent ammonia concentrations. Also refer to **Table 1G** in the Statement of Basis for waste load allocation information.

1) AMBIENT RECEIVING STREAM FLOW VOLUME: Receiving waterbody low-flow conditions must be considered when calculating permit effluent limits. Low flow conditions can be determined by calculating and using a receiving waterbody '7Q10' flow- (the minimum seven consecutive day flow that has the probability of occurring once in ten years) to represent receiving waterbody flow volumes in the WLA calculations. Using 7Q10 values to establish end-of-pipe effluent limits provides a margin of safety because "worst case" flow conditions are considered in the WLA calculations. Upstream USGS daily monitoring station data can be used to calculate 7Q10 critical low flows. In this instance, USGS station 13013650 'Snake River at Moose, WY' was selected. **Table 1B** contains information related to the selected USGS station and the calculated 7Q10 values used in this permit's WLA calculations. A shareware program jointly developed between the USGS and the EPA called 'SW Toolbox' was used to calculate the 7Q10 values presented in **Table 1B**.

Table 1B: 7Q10 Calculations and USGS Daily Monitoring Station Information				
U.S.G.S. Station Number	Station Name	Flow Data Period of Record	May- September 7Q10 Value, cfs	October- April season 7Q10 Value, cfs
13013650	Snake River at Moose, WY	1996-2022	1420	637

2) UPSTREAM CONSTITUENT CONCENTRATIONS

Ammonia toxicity is both pH and temperature-dependent. Ambient median pH and maximum temperatures were calculated using data from USGS gauging station 13013650 'Snake River at Moose, WY'. While there are other, closer USGS gauging stations, they are either located downstream of this facility's outfalls, or have insufficient data to allow reliable ambient water quality constituent characterization. **Table 1C** describes the data used to calculate median pH and maximum temperatures within the Snake River.

Table 1C: Upstream Background Ammonia, pH and Temperature Data				
Constituent	May-September season	October-April season	Number of Observations	Period of Record
Ammonia, average, mg/L	0.215	0.145	Summer season – 41 Winter season - 51	1971-2005
pH, median, standard units	8.1	8.3	Summer season – 41 Winter season - 51	1971-2005
Temperature, maximum, °C	20	9.5	Summer season – 41 Winter season - 51	1971-2005

3) MAXIMUM MONTHLY ENGINEERED DISCHARGE VOLUME

This facility is engineered to handle effluent treatment and discharge of 5.0 million gallons per day (MGD). Based on conveyance loss estimates described above, a discharge rate of 4.8 MGD is used in the waste load allocation calculations for the Snake River. At this time, the facility's maximum reported discharge volume is 3.66 MGD at outfall 001. This permit establishes a discharge flow limit of 5.0 MGD at outfall 001.

4) SITE-SPECIFIC AMMONIA INSTREAM STANDARD CALCULATIONS

Using the information given above, a site-specific ammonia standard can be calculated for this facility. See **Table 1D** and the waste load allocation spreadsheet (**Table 1G**). Site-specific standards were calculated using applicable ammonia toxicity criteria established in *Wyoming Water Quality Rules and Regulations, Chapter 1, Appendix C*, as stated in **Table 1D**.

Table 1D: Ammonia Aquatic Life Site-Specific Standards			
Constituent	May- September Season	October- April Season	Ammonia Toxicity Criteria
Site-specific Chronic Ammonia standard, mg/L	1.47	1.52	Temperature and pH-dependent Values of the Chronic Criterion for Ammonia, 'Fish Early Life Stages Present'
Site-specific Acute Ammonia standard, mg/L	4.64	3.15	pH-dependent Values of the Acute Criterion for Ammonia, 'Salmonids Present'

5) MAXIMUM ALLOWABLE AMMONIA CONCENTRATIONS IN EFFLUENT

Table 1E: End-of-Pipe Ammonia Limits		
Season	Ammonia Effluent Limits, mg/L	
	Calculated Effluent Limit (based on acute standard), daily maximum effluent limit within mixing zone segment*	Calculated Effluent Limit (based on chronic standard), monthly average effluent limit for Snake River (entire)
May-September	87.0	218.9
October-April	28.2	112.7

Total Ammonia Effluent Limits: Using the information identified and calculated above, the resulting ammonia waste load allocation calculations in **Table 1G** ammonia end-of-pipe effluent results, see **Table 1E**.

*acute effluent limits for ammonia are calculated in this case using only 10% of the entire river's critical low flow. This is based on estimated flow conditions within the mixing zone of the river. Mixing zone critical low flow = 142 cfs May-September; 63.7 cfs October-April. Chronic effluent limits are calculated to achieve compliance with chronic instream standards outside of the mixing zone, and therefore incorporate the full dilution of the river at critical low flow. Critical low flow beyond mixing zone = 1420 cfs May-September; 637 cfs October-April.

Reasonable Potential Analysis - Ammonia Numeric Criteria

NPDES regulations in 40 CFR § 122.44(d)(1)(i) – (iii) and WYPDES regulations in Chapter 2, Section 5(c)(iii)(C) of the Wyoming Water Quality Rules and Regulations require WDEQ to assess effluent with respect to approved water quality standards, in order to evaluate the impact of discharges on downstream water quality. This assessment is used to determine permit limitations that are protective of water quality uses. For this permit renewal, WDEQ analyzed facility data for Ammonia to determine if the effluent has a reasonable potential (RP) to exceed water quality standards established in Chapter 1 of the WWQR. The applicable numeric water quality standards for ammonia in the Snake River are listed in Table 1D above. Monthly effluent data for ammonia was collected by the Town of Jackson in 2012-2013 at the point where effluent from the facility enters a braid of the Snake River (43.93192, -110.777519). This is not the regulated outfall for the facility. Rather, WDEQ required this sampling in order to characterize effluent water quality subsequent to conveyance through the barrow pond and constructed wetlands below the regulated outfall (001). Numeric water quality standards for ammonia do not apply to the barrow pond, constructed wetlands, or any other class 3B receiving waters located between outfall 001 and the Snake River.

The effluent data for ammonia was compared to applicable calculated ammonia effluent limits (Table 1E) for protection of the Snake River. Ammonia concentration variability in the discharge was also considered, using a coefficient of variation and sample population size to derive a projected 'maximum expected' concentration of ammonia in the effluent where it reaches the Snake River. Where a sample result had a concentration of "non-detect," WDEQ used a substitute value of half the detection limit, rather than assuming the concentration was zero. A quantitative reasonable potential evaluation was performed using statistical procedures consistent with EPA's *Technical Support Document for Water Quality Based Toxics Control*, March 1991 (TSD). A confidence level of 95% was used for these RP calculations. Maximum expected concentration was derived from multipliers in Table 3-2 of the above referenced TSD. RP analysis results for ammonia in this discharge indicate no reasonable potential

to exceed instream water quality standards. This permit therefore includes no effluent limits for ammonia. This permit determination is made in accordance with 40 CFR § 122.44(d)(1)(i) – (iii) and WYPDES regulations in Chapter 2, Section 5(c)(iii)(C) of the Wyoming Water Quality Rules and Regulations. See analytical results below.

Ammonia

<u>Ammonia Sample Type / Location</u>	<u>Sample Date</u>	<u>Sample Concentration (mg/L)*</u>
Effluent at Entry into Snake River	9/19/2012	ND
Effluent at Entry into Snake River	10/31/2012	ND
Effluent at Entry into Snake River	11/30/2012	ND
Effluent at Entry into Snake River	12/31/2012	ND
Effluent at Entry into Snake River	1/31/2013	0.5
Effluent at Entry into Snake River	2/28/2013	3.24
Effluent at Entry into Snake River	3/31/2013	4.44
Effluent at Entry into Snake River	4/30/2013	0.28
Effluent at Entry into Snake River	5/31/2013	0.14
Effluent at Entry into Snake River	6/30/2013	ND
Effluent at Entry into Snake River	7/31/2013	ND
Effluent at Entry into Snake River	9/30/2013	ND

*ND = Non-Detect. The lower detection level for ammonia, using EPA methods in 40 CFR Part 136, is 0.05 mg/L. For samples with non-detect concentrations reported, a substitute value equal to half the detection level (0.025 mg/L) was used for statistical purposes in this RP analysis, rather than assuming the concentration was zero.

Ammonia Sample Population (n)	12
Minimum	0.025 mg/L
Maximum	4.44 mg/L
Mean	0.7 mg/L
Standard Deviation	1.48 mg/L
Coefficient of Variation (CV)	2.0
Variability Multiplier (TSD 1991, Table 3-2)	3.0
Maximum Expected Concentration (@ 95% confidence level) <i>Max 4.44 mg/L x 3.0</i>	13.3 mg/L
Calculated Ammonia Effluent Limit (most stringent)	28.2 mg/L
Reasonable Potential to Exceed Calculated Effluent Limit?	NO

NARRATIVE AQUATIC LIFE CRITERIA FOR AMMONIA

Chapter 1, Section 21 of the Wyoming Water Quality Rules and Regulations establishes numeric criteria in Appendix C for ammonia in all Class 1, 2B, 2A, 2B and 2C waters. For this segment of the Snake River (class 2AB), those criteria are listed above in Table 1E, and discussed further in the reasonable potential analysis for Ammonia above.

For class 3B waters, such as those situated between outfall 001 and the Snake River, Section 21 establishes a narrative criterion for ammonia: “...concentrations of ammonia attributable to or influenced by human activities shall not be present in concentrations which could result in harmful acute or chronic effects to aquatic life, or which would not fully support existing and designated uses.” One standardized way to verify compliance with this narrative criterion is to test the effluent for net toxic effect on reference organisms.

Whole Effluent Toxicity (WET) limits and monitoring requirements are established in this permit at Part I.A, and described further in Part I.C. WET tests conducted with effluent from this facility must pass at an effluent concentration of 100% (no dilution available). This is because the primary source of water in the barrow pond and other class 3B receiving waters is effluent from the facility. While the constructed wetlands are class 3B waters by default, they are not subject to the same water quality protections established for naturally occurring water bodies. Chapter 1, Section 12 of the Wyoming Water Quality Rules and Regulations (Protection of Wetlands) states: “Point or nonpoint sources of pollution shall not cause the destruction, damage, or impairment of naturally occurring wetlands except when mitigated through an authorized wetlands mitigation process... This section does not apply to wetlands created by point or nonpoint sources, nor are such wetlands required to be maintained through continuation of such discharges.” Regardless, this permit does recognize that other class 3B receiving waters do occur between outfall 001 and the Snake River. These other class 3B waters (Barrow Pond and Goose Creek) are subject to narrative protections for aquatic life established in Chapter 1, Section 21. Listed below is a summary of the facility’s compliance with narrative requirements in Chapter 1, Section 21 over the past 2 permit terms (10+ years). WET test results for this facility indicate that there is no reasonable potential for the effluent to exert a toxic effect on aquatic life in the class 3B receiving waters. Future WET testing could therefore be removed ordinarily, in accordance with 40 CFR § 122.44(d)(1)(i) – (iii) and WYPDES regulations in Chapter 2, Section 5(c)(iii)(C) of the Wyoming Water Quality Rules and Regulations. However, because this facility is characterized as a major discharge (greater than 1 MGD flow), WET testing is retained regardless of past performance, pursuant to 40 CFR 122.21 (j)(5) and WWQRR Chapter 2, Appendix E(a)(iii) and (a)(vii).

WET Test Description	Organism Type	Date (sampling quarter end date)	Effluent Concentration (%)	WET Test Result
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2014	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2014	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2014	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2014	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2015	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2015	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2015	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2015	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2016	100	Pass

WET Test Description	Organism Type	Date (sampling quarter end date)	Effluent Concentration (%)	WET Test Result
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2016	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2016	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2016	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2017	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2017	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2017	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2017	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2018	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2018	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2018	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2018	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2019	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2019	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2019	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2019	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2020	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2020	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2020	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2020	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2021	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2021	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2021	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2021	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2022	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2022	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2022	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2022	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2023	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2023	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	9/30/2023	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	12/31/2023	100	Pass
Static 48Hr Acute Ceriodaphnia (water flea)	Invertebrate	3/31/2024	100	Pass
Static 96 Hr Acute Pimephales (minnow)	Vertebrate	6/30/2024	100	Pass

6) E. COLI WATER-QUALITY-BASED EFFLUENT LIMITS

According to *Wyoming Water Quality Rules and Regulations, Chapter 1* and the state of Wyoming’s ‘Recreation Designated Uses Web Map’ (<https://wdeq.maps.arcgis.com/apps/webappviewer/index.html?id=177cf0d99fb34b1aac1664944f754b7d>), the “**High Use Swimming Areas**” primary recreation E. coli standards apply to this facility. From May 1 through September 30 (summer recreation season), the daily maximum E. coli standard is 235 colonies/100 mL, while the monthly average standard is 126 colonies/100 mL. From October 1 through April 30, the monthly average and daily maximum E. coli effluent limit is 630 colonies/100 mL (See **Table 1F**).

Table 1F. E. coli Bacteria Standards, In Waters Designated for Primary Contact Recreation			
May through September			October through April
Monthly Average Standard	Daily Maximum Standards	Criteria	Monthly Average and Daily Maximum
126 colonies/100 mL	235 colonies/100 mL	High Use Swimming Areas	630 colonies/100 mL
	298 colonies/100 mL	Moderate Full-Body Contact	
	410 colonies/100 mL	Lightly-Used Full-Body Contact	
	576 colonies/100 mL	Infrequently-Used Full-Body Contact	

Source: Chapter 1, Wyoming Water Quality Rules and Regulations

TOTAL RESIDUAL CHLORINE WATER-QUALITY-BASED EFFLUENT LIMITS: Although this facility does not rely upon chlorination to provide effluent disinfection, this permit contains total residual chlorine (TRC) effluent limits equal to instream TRC standards (0.011 mg/L, monthly average, and 0.019 mg/L, daily maximum) in the event this facility might need to use chlorine as an alternate emergency disinfectant.

PERCENT REMOVAL REQUIREMENTS: Percent removal requirement compliance is based upon 30-day average sampling. More frequent sampling is optional. CBOD and TSS concentrations for effluent samples collected each calendar month shall demonstrate a minimum of eighty-five percent (85%) CBOD and TSS removal, measured by dividing the respective differences between the mean influent and effluent concentrations for the calendar month by the respective mean influent concentration for the calendar month, and multiplying the quotient by 100.

$$\left[\frac{\text{Influent} - \text{Effluent}}{\text{Influent}} \right] \times 100$$

OTHER REPORTING AND MONITORING REQUIREMENTS

1. Instream Monitoring:

Beginning July 1, 2025, quarterly sampling is required at five instream locations near the facility. The purpose of this monitoring is to evaluate overall nutrient conditions in nearby waters, and direct future monitoring and resources to any affected areas. While the facility does not discharge to Flat Creek, subsurface flow patterns between the project area and Flat Creek are currently unknown. Additionally, net effluent nutrient contributions to the Snake River from this facility have previously not been quantified. No effluent limits are associated with these instream monitoring locations. They are designated in the permit for data collection only. In addition, WDEQ recognizes that potential non-point sources of nutrient pollution exist in this immediate area (elk feed

grounds, concentrated waterfowl populations, grazed pasture lands, etc.). These nearby land uses are beyond the control of the wastewater treatment plant. Any data gathered at these instream locations will be used for preliminary assessment of overall conditions in the area, and not for direct implication of the permitted facility. Further study may be required in the future. Beginning July 1, 2025, the permittee shall collect quarterly samples at the designated monitoring stations (UFC, DFC, BHR, SR1, SR2 - see **Table 1F**), and report sample results to the WDEQ quarterly. Quarterly sampling is required at the five instream monitoring stations for the following parameters:

- Total Ammonia as N
- Total Nitrogen
- Nitrate + Nitrite Nitrogen
- Total Phosphorus
- Orthophosphate phosphorus
- pH
- Temperature

Table 1F: Instream Water Quality Monitoring Stations

Monitoring Station #	Quarter/Quarter	Section	Town-ship	Range	Latitude	Longitude	Description
UFC	SWNE	29	41N	116W	43.40267	-110.78243	Upstream Flat Creek Monitoring Station, located in north end of project area
DFC	NWSW	28	41N	116W	43.39882	-110.77058	Downstream Flat Creek monitoring station, located near South Park Feedgrounds Road
BHR	SEnw	29	41N	116W	43.39984	-110.78710	“Blue Heron Reservoir” outlet, located at western release point from the WGFD constructed wetlands.
SR1	SWSE	29	41N	116W	43.39404	-110.78040	Snake River – upper station, located at mouth of “Goose Creek” spring.
SR2	NWNW	33	41N	116W	43.39170	-110.77168	Snake River – lower station, located at downstream end of the receiving braid of Snake River

MAJOR DISCHARGER: This facility is classified as a ‘major’ discharge by EPA. For publicly-operated treatment works (sewage treatment plants), major dischargers are facilities with design flows greater than 1 million gallons per day (MGD), and/or facilities that serve a population greater than 10,000, or those that cause significant water quality impacts. Therefore, the town of Jackson’s wastewater treatment plant qualifies for the ‘major discharge’ category because its design flow is 5 MGD, and it serves a population of 10,849.

WHOLE EFFLUENT TOXICITY: Because this facility is classified as a major discharger, this permit contains “Whole Effluent Toxicity” (WET) limits and self-monitoring requirements. On a quarterly basis, acute toxicity testing shall be performed on two alternating species (one species per quarterly WET sampling period).

ANTI-BACKSLIDING PROVISION: This permit originally established end-of-pipe total suspended solids weekly average and daily maximum limits of 150 and 300 mg/L, respectively and a 5-day carbonaceous biochemical oxygen demand (CBOD₅) limit of 80 mg/L, daily maximum. Review of these limits, National Secondary Treatment Standards, and Wyoming Water Quality Rules and Regulations has revealed that these limits are not based upon any regulation or policy. Because these limits were originally established in error, WDEQ has removed this facility's weekly average and daily maximum TSS limits, and the facility's daily maximum COBD₅ limit. WDEQ has determined that removing this facility's weekly average and daily maximum TSS effluent limits and daily maximum CBOD₅ limit conforms to anti-backsliding requirements established in *Section 402(o).2.B.i of the Clean Water Act*.

ANTIDEGRADATION, IMPAIRMENT REVIEW: The effluent limits and requirements established in this permit have been reviewed to ensure adequate protection of the receiving stream's water quality and maintenance and protection of the receiving water's designated uses. An antidegradation review has been conducted by WDEQ staff and verifies that the permit conditions and effluent limitations established in this permit provide a level of receiving water protection consistent with the state of Wyoming's antidegradation provisions and surface water quality standards. As part of the antidegradation review, DEQ staff reviewed the state of Wyoming's 303(d) list of impaired waterbodies to determine if this facility's receiving waterbody has been listed as a waterbody unable to support its designated uses. The evaluation revealed that the Snake River (class 2AB) has not been included on the state's 303(d) list.

Effluent quality and quantity self-monitoring is required on a regular basis, results shall be reported as established in Part I, **Tables A and B** of the permit. This permit renewal is scheduled to expire on October 31, 2029.

Jason Thomas
Water Quality Division
Department of Environmental Quality
Revised: August 9, 2024

Table 1G: Town of Jackson Wasteload Allocation Calculations									
Permit Number: WY0021458									
Parameter and Season	Low Flow, cfs (7Q10)	Low Flow MGD (7Q10)	Discharge Rate, MGD	Combined Flow, MGD	Water Quality Standard (mg/L)	Background Concentration (LA) (mg/L)	Assimilative Capacity of Stream (mg/L), increment between background and standard	In-Stream Antidegradation Threshold (mg/L)	WLA Limit (mg/L) (Cd)
Nomenclature and Calculations			(Qd)	(Qr)		(Cs)		(Cr)	(Cd)=((QrCr)-(QsCs))/Qd)
Ammonia (chronic), monthly average, May-September	1420	917.8	4.8	922.6	1.47	0.22	1.26	1.47	218.93
Ammonia (chronic), monthly average, October-April	637	411.7	4.8	416.5	1.52	0.15	1.38	1.52	112.65
Ammonia (acute), daily maximum, May-September	142	91.8	4.8	96.6	4.64	0.22	4.43	4.64	87.00
Ammonia (acute), daily maximum, October-April	63.7	41.2	4.8	46.0	3.15	0.15	3.01	3.15	28.24

AUTHORIZATION TO DISCHARGE UNDER THE
WYOMING POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, (hereinafter referred to as "the Act"), and the Wyoming Environmental Quality Act,

Jackson, Town of

is authorized to discharge from the Jackson Wastewater Lagoon treatment facilities located in the:

SWNW Section 29, Township 41N, Range 116W, Teton County

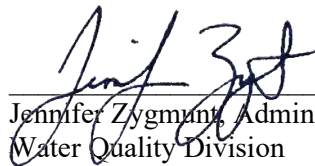
to receiving waters named

Snake River (2AB) via a barrow pond (3B) near the outfall, then a series of constructed wetlands (3B), then Goose Creek (3B), a local spring that is a tributary to the Snake River. Water from the constructed wetlands can also bypass Goose Creek and flow directly to the Snake River through a pipeline operated by the Wyoming Game and Fish Department.

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II and III hereof.

This permit renewal shall become effective on November 1, 2024.

This permit renewal and the authorization to discharge shall expire October 31, 2029 at midnight.



Jennifer Zygmunt, Administrator
Water Quality Division



Todd Parfitt, Director
Department of Environmental Quality

Issuance Date October 15, 2024

PART I

A. EFFLUENT LIMITATIONS – ALSO SEE PART III OF THIS PERMIT FOR ADDITIONAL REQUIREMENTS

Effective **November 1, 2024** and lasting through **October 31, 2029**, effluent quality discharged by the permittee shall, at a minimum, meet limitations established in **Table A**. The permittee is authorized to discharge from outfall serial number(s) 001.

Table A: Effluent Limits, Required Reporting Units, Sampling and Reporting Schedules, and Required Sample Types, WY0021458						
Limited Constituent and Required Reporting Units	Effluent Limits			Sampling Schedule	Reporting Schedule	Required Sample Type
	Monthly Average (b) (h)	Weekly Average (b) (h)	Daily Maximum (a) (b) (h)			
Five-Day Carbonaceous Biochemical Oxygen Demand (CBOD ₅) mg/L, effluent	25	40	N/A	Weekly	Monthly	Grab
CBOD ₅ , mg/L, influent(i)	Report	Report	N/A	Weekly	Monthly	Grab
CBOD ₅ , % Removal (d)	85	N/A	N/A	Monthly	Monthly	Calculated
E. coli, colonies/100 mL, May-September	126	N/A	235	5 Times Monthly	Monthly	Daily Maximum (Grab) Monthly Average (Calculated)
E. coli, colonies/100 mL, October-April	630	N/A	630	5 Times Monthly	Monthly	Daily Maximum (Grab) Monthly Average (Calculated)
Effluent Discharge Duration, days/month (g)	Report (g)	N/A	N/A	Daily	Monthly	Report
Effluent Flow Volume, MGD	5.0	N/A	N/A	Daily	Monthly	Continuous or Instantaneous
Oil and Grease, mg/L(e)	N/A	N/A	10	Weekly	Monthly	Grab
pH, s.u. (c)	All effluent sample pH measurements shall remain within the range of 6.5-9.0 standard units			Weekly	Monthly	Grab (Field Measurement)
Temperature, effluent, °C	Report	N/A	Report	Weekly	Report	Weekly

Table A: Effluent Limits, Required Reporting Units, Sampling and Reporting Schedules, and Required Sample Types, WY0021458						
Limited Constituent and Required Reporting Units	Effluent Limits			Sampling Schedule	Reporting Schedule	Required Sample Type
	Monthly Average (b) (h)	Weekly Average (b) (h)	Daily Maximum (a) (b) (h)			
Total Residual Chlorine (mg/L) (f)	0.011	N/A	0.019	Daily	Monthly	Daily Maximum (Grab), Monthly
Total Suspended Solids, mg/L, effluent	100	Report	Report	Weekly	Monthly	Daily Maximum (Grab) Monthly and Weekly Average (Calculated)
Total Suspended Solids, mg/L, influent(i)	Report	Report	Report	Weekly	Monthly	Daily Maximum (Grab) Monthly and Weekly Average (Calculated)
Total Suspended Solids, % Removal	85%	N/A	N/A	Weekly	Monthly	Calculated
Ammonia as N, mg/L	Report	N/A	Report	Monthly	Monthly	Grab
Whole Effluent Toxicity (WET) Acute, Pass at 100% effluent (e)	N/A	N/A	Pass	Quarterly	Quarterly	Grab
Dissolved Oxygen, mg/L	N/A	N/A	Report	Annually	Annually	Grab
Nitrogen, Total, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab
Nitrate/Nitrite, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab
Orthophosphate phosphorus, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab
Total Dissolved Solids	N/A	N/A	Report	Quarterly	Quarterly	Grab
Total Phosphorus, mg/L	N/A	N/A	Report	Quarterly	Quarterly	Grab

- (a) Any single analysis and/or measurement beyond this limitation shall be considered a violation of the conditions of this permit.
- (b) Monthly Average, Weekly Average and Daily Maximum are defined in Part I.C.3.
- (c) The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units in any single grab sample.
- (d) Percent removal requirement compliance is based upon 30-day average sampling. More frequent sampling is optional. CBOD₅ effluent sample concentration arithmetic means for effluent samples collected during each calendar month shall demonstrate a minimum of eighty-five percent (85%) CBOD₅ removal, (effluent compared to influent), measured by

dividing the respective differences between the mean influent and effluent concentrations collected during each calendar month by the respective mean influent concentrations for same calendar month, and multiplying the quotient by 100.

$$\frac{\text{Influent} - \text{Effluent}}{\text{Influent}} * 100$$

Where:

Influent = arithmetic mean of all influent CBOD₅ samples collected during a calendar month

Effluent = arithmetic mean of all effluent CBOD₅ samples collected during the same calendar month

- (e) Acute toxicity occurs when 50% or more mortality is observed for either species at any effluent concentration. WET testing for this permit shall occur on an alternating species basis.
- (f) Total residual chlorine sampling and reporting is only required in the event the facility uses chlorine in their wastewater treatment process.
- (g) For the parameter 'Effluent Discharge Duration' ONLY, the permittee shall report the total number of days per month that outfall discharges occurred.
- (h) If the discharge occurs on an intermittent basis, samples shall be collected while the facility is discharging. Intermittent discharge shall not be a valid reason to forgo effluent sampling.
- (i) Influent sample values shall be recorded under outfall 'INF' within the permittee's discharge monitoring report.

Samples taken in compliance with the monitoring requirements established in **Table A** shall be taken at the outfall from the final treatment unit and prior to admixture with diluent water or the receiving stream.

There shall be no discharge of floating solids or visible foam in other than trace amounts, nor shall the discharge cause formation of a visible sheen or visible hydrocarbon deposits on the bottom or shoreline of the receiving water.

All waters shall be discharged in a manner to prevent erosion, scouring, or damage to stream banks, stream beds, ditches, or other waters of the state at the point of discharge. In addition, there shall be no deposition of substances in quantities that could result in significant aesthetic degradation, or aquatic life, plant life, or wildlife habitat degradation or that could adversely affect public, agricultural, or industrial water supplies.

B. INSTREAM MONITORING POINTS (UFC, DFC, BHR, SR1, SR2)

1. Effective **July 1, 2025** and lasting through **October 31, 2029**, the facility shall conduct instream monitoring at locations UFC, DFC, BHR, SR1, SR2 for the following constituents on a quarterly basis, as specified in **Table B**.

Table B: Instream Sampling and Reporting Requirements*

Parameter and Required Reporting Units	Sampling Frequency	Reporting Requirements	Sample Type
Ammonia, Total as N, mg/L	Quarterly	Quarterly	Grab
Nitrate + Nitrite Nitrogen, mg/L	Quarterly	Quarterly	Grab
Nitrogen, Total, mg/L	Quarterly	Quarterly	Grab
Orthophosphate phosphorus, mg/L	Quarterly	Quarterly	Grab
pH, s.u.	Quarterly	Quarterly	Grab (Field Measurement)
Phosphorus, Total, mg/L	Quarterly	Quarterly	Grab
Temperature, °C	Quarterly	Quarterly	Grab (Field Measurement)

*For station locations, see Table 1.

C. WHOLE EFFLUENT TOXICITY (WET) TESTING

1. Effluent Limitations (Toxic Pollutants)

Effective the date of permit issuance through October 31, 2029; there shall be no acute toxicity occurring in the effluent from this facility.

2. Whole Effluent Testing (Acute).

The permittee shall, at least once each calendar quarter, conduct acute static replacement toxicity tests on an effluent grab sample. Quarterly samples shall be collected on a two (2) day progression; i.e., if the first quarterly sample is collected on a Monday, during the next quarter, the sample shall be collected on a Wednesday, etc. ***Due to the logistics involved with getting samples to contract laboratories for analysis before hold time expiration, WET sampling is not required on Friday, Saturday, or Sunday.***

Replacement static toxicity tests shall be conducted in accordance with procedures established in 40 CFR 136 and the most current edition of *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms*, EPA-821/R-02-012. In the event of methods conflicts, 40 CFR 136 prevails. The permittee shall conduct an acute 48-hour static toxicity test using *Ceriodaphnia dubia* and an acute 96-hour static toxicity test using *Pimephales promelas*, **on an alternating basis each quarter (one species per quarterly WET sampling period)**. All tests shall be conducted utilizing a multi-dilution series consisting of at least five (5) concentrations and a control as defined below:

100% effluent
62.5% effluent
50% effluent
25% effluent
12.5% effluent
control (or 0% effluent)

In the event of inconclusive test results, the WDEQ reserves the right to require the permittee to perform additional tests at alternate dilutions and/or replicates. The WDEQ

also reserves the right to require submission of all information regarding all initiated tests, regardless if tests were carried to completion or not.

Acute toxicity occurs when 50 percent or more mortality is observed for either species at any effluent concentration. If more than 10 percent control mortality occurs, the test is invalid. Tests shall be repeated until satisfactory control survival is achieved.

If acute toxicity occurs, an additional test shall be conducted within two (2) weeks of the date the permittee learned of the test failure. If only one species fails, retesting may be limited to the failing species. Should acute toxicity occur in the second test, testing shall occur once a month until further notified by the permit issuing authority. The permittee shall promptly take all reasonable measures necessary to immediately reduce toxicity if the suspected toxicant is known.

Quarterly test results shall be reported concurrently with Discharge Monitoring Reports (DMR) due each reporting calendar quarter (e.g., whole effluent results for the calendar quarter ending March 31, shall be reported with the DMRs due April 28, with the remaining reports submitted with DMRs due each July 28, October 28 and January 28). Monthly test results shall be reported concurrently with DMRs submitted for that month and shall include all chemical and physical data as specified.

3. Toxicity Reduction Evaluation (TRE) and Toxicity Identification Evaluation (TIE)

Should toxicity be detected in the permittee's discharge, a TIE-TRE shall be undertaken by the permittee to establish the cause of the toxicity, locate the source(s) of the toxicity, and develop control of, or treatment for the toxicity. Failure to initiate or conduct an adequate TIE-TRE, or delays in the conduct of such tests, shall not be considered a justification for noncompliance with whole effluent toxicity limits contained in this permit. A TRE plan shall be submitted to the permitting authority within 45 days of confirmation of effluent toxicity continuance.

4. Chronic Toxicity Limitation-Reopener Provision

This permit may be reopened and modified (following proper administrative procedures) to include chronic whole effluent toxicity limitations if information or data are developed indicating chronic whole effluent toxicity limits are needed as required under 40 CFR 122.44 (d). Also see Part IV.P. of this permit for additional whole effluent toxicity reopener provisions.

If acceptable to the permit issuing authority, and if in conformance with current regulations, this permit may be reopened and modified to incorporate TRE conclusions relating to additional numerical limitations, a modified compliance schedule, and/or modified whole effluent protocol.

D. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water, or substance. Monitoring points shall not be changed without notification to and approval by the permit issuing authority. Sludge samples shall be collected immediately prior to the disposal practice at a location representative of the sludge.

2. Reporting

Effluent monitoring results obtained during the previous monitoring period shall be summarized and reported electronically in NetDMR, accessed at https://usepa.servicenowservices.com/oeca_icis . Any permittee needing a NetDMR account can contact WDEQ - WYPDES staff for account set-up assistance.

If no discharge occurs during the reporting period, "no discharge" shall be reported within NetDMR for that period. If discharge is intermittent during the reporting period, sampling shall be done while the facility is discharging. Failure to submit discharge monitoring reports for each monitoring period will result in noncompliance status for the facility. The reports shall be submitted in NetDMR no later than the 28th day of the month following the completed reporting period. The first report following this permit renewal issuance is due on **December 28, 2024**.

Wyoming Department of Environmental Quality-Water Quality Division 200 West 17 th Street Cheyenne, WY 82002 Telephone: (307) 777-7781	Policy, Enforcement Management and Environmental Justice Program (ENF-PJ) ATTN: NPDES Enforcement U.S. EPA, Region 8 1595 Wynkoop St. Denver, CO 80202-1129 Telephone: (303) 293-1622
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If no discharge occurs during an entire reporting period, "no discharge" shall be reported. If discharge is intermittent during any reporting period, sampling shall occur while the facility is discharging.

3. Definitions

Concentration Values

- a. Daily Maximum (mg/L) - The highest single reading from any grab or composite sample collected during the reporting period.

- b. Monthly Average (mg/L) - The arithmetic mean (geometric mean in the case of fecal coliform or E. coli) of all composite and/or grab samples collected during a calendar month.
- c. Weekly Average (mg/L) - The arithmetic mean (geometric mean in the case of fecal coliform or E. coli) of all composite and/or grab samples collected during any week. A week begins at 12:01 a.m. Sunday morning and ends at 12:00 midnight Saturday evening.

Quantity Values

- d. Daily Maximum - The highest single daily quantity reading (see Calculations below) recorded during the reporting period.
- e. Monthly Average - The arithmetic mean (geometric mean in the case of fecal coliform or E. coli bacteria) of all the daily quantity readings (see Calculations below) recorded during a calendar month.
- f. Weekly Average - The arithmetic mean (geometric mean in the case of fecal coliform or E. coli bacteria) of all the daily quantity readings (see Calculations below) recorded during a week. A week begins at 12:01 am Sunday morning and ends at 12:00 midnight Saturday evening.

Flow Values

- g. Daily Flow - The flow volume recorded on any single day. The daily flow volume may be determined by using an instantaneous reading (if authorized by this permit) or a continuous recorder.
- h. Monthly Average Flow - The arithmetic mean of all daily flow values recorded during a calendar month.
- i. Weekly Average Flow - The arithmetic mean of all daily flow values recorded during a week. A week begins at 12:01 am on Sunday morning and ends at 12:00 midnight Saturday evening.

Calculations

- j. Daily Quantity (kg/day) - The quantity, in kilograms per day, of pollutant discharged on a single day. The Daily quantity shall be calculated by multiplying the composite or grab sample concentration value for that day in milligrams/liter (mg/L) times the flow volume (in millions of gallons per day - MGD) for that day times 3.78. If a flow volume reading for the day the sample is collected is not available, the average flow volume reading for the entire reporting period shall be used.
- k. Daily Quantity (#/day) - The quantity, in number per day, of bacteria or other pollutants discharged on a single day. The number per day shall be calculated by multiplying the composite or grab sample result for that day, in number per 100 milliliters (#/100 mL), times the flow volume (in millions of gallons per day - MGD) times 3.78×10^7 . If a flow volume reading for the day the sample is

collected is not available, the average flow volume reading for the entire reporting period shall be used.

- l. Geometric Mean - Calculated in accordance with the procedure described in the most recent edition of "Standard Methods for the Examination of Water and Wastewater".

Miscellaneous

- m. A "composite" sample, for monitoring requirements, is defined as a minimum of four (4) grab samples collected at equally spaced two (2) hour intervals and proportioned according to flow.
- n. An "instantaneous" measurement for monitoring requirements is defined as a single reading, measurement, or observation.
- o. "MGD", for monitoring requirements, is defined as million gallons per day.
- p. "Net" value, if noted under Effluent Characteristics, is calculated on the basis of the net increase of the individual parameter over the quantity of that same parameter present in the intake water measured prior to any contamination or use in the process of this facility. Any contaminants contained in any intake water obtained from underground wells shall not be adjusted for as described above and, therefore, shall be considered as process input to the final effluent. Limitations in which "net" is not noted are calculated on the basis of gross measurements of each parameter in the discharge, irrespective of the quantity of those parameters in the intake waters.
- q. A "pollutant" is any substance or substances which, if allowed to enter surface waters of the state, causes or threatens to cause pollution as defined in the Wyoming Environmental Quality Act, Section 35-11-103.

4. Test Procedures

Test procedures for the analysis of pollutants, collection of samples, sample containers, sample preservation, and holding times, shall conform to regulations published pursuant to 40 CFR, Part 136, unless other test procedures have been specified in this permit.

5. Results Recording

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date and time of sampling;
- b. The dates and times the analyses were performed;
- c. The person(s) who performed the analyses and collected the samples;
- d. The analytical techniques or methods used; and

- e. The results of all required analyses including the bench sheets, instrument readouts, computer disks or tapes, etc., used to determine the results.

6. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form. Such increased frequency shall also be indicated.

7. Records Retention

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurements report or application. This period may be extended by request of the administrator at any time. Data collected on site, copies of Discharge Monitoring Reports and a copy of this WYPDES permit must be maintained on site during the duration of activity at the permitted location.

8. Penalties for Tampering

The Act provides that any person who falsifies, tampers with or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than two (2) years per violation, or both.

9. Outfall and Monitoring Station Locations:

See Table 1.

Table 1: Outfall and Monitoring Station Location Information, WY0021458 – Town of Jackson Wastewater Lagoons							
Outfall or Monitoring Station #	Qtr/Qtr	Section	Township	Range	Latitude	Longitude	Receiving Water
001	SWNW	29	41N	116W	43.40116	-110.78851	Snake River (2AB) via Barrow pond (3B), constructed wetlands (3B) and “Goose Creek” (3B)
UFC	SWNE	29	41N	116W	43.40267	-110.78243	Upstream Flat Creek Monitoring Station, located in north end of project area
DFC	NWSW	28	41N	116W	43.39882	-110.77058	Downstream Flat Creek monitoring station, located near South Park Feed grounds Road

Table 1: Outfall and Monitoring Station Location Information, WY0021458 – Town of Jackson Wastewater Lagoons							
BHR	SEnw	29	41N	116W	43.39984	-110.78710	“Blue Heron Reservoir” outlet, located at western release point from the WGFD constructed wetlands.
SR1	SWSE	29	41N	116W	43.39404	-110.78040	Snake River – upper station, located at mouth of “Goose Creek” spring.
SR2	NWNW	33	41N	116W	43.39170	-110.77168	Snake River – lower station, located at downstream end of the receiving braid of Snake River

PART II

A. MANAGEMENT REQUIREMENTS

1. Changes

The permittee shall give notice to the administrator of the Water Quality Division as soon as possible of any physical alterations or additions to the permitted facility. Notice is required when:

- a. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source as determined in 40 CFR 122.29 (b); or
- b. The alteration or addition could change the nature or increase the quantity of pollutants discharged.

2. Noncompliance Notification

- a. The permittee shall give advance notice of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- b. The permittee shall report any noncompliance which may endanger health or the environment as soon as possible, but no later than 24 hours from the time the permittee first became aware of the circumstances. The report shall be made to the Water Quality Division, Wyoming Department of Environmental Quality at (307) 777-7781.
- c. For any incidence of noncompliance, including noncompliance related to non-toxic pollutants or non-hazardous substances, a written submission shall be provided within five (5) days of the time that the permittee becomes aware of the noncompliance circumstance.

The written submission shall contain:

- (1) A description of the noncompliance and its cause;
 - (2) The period of noncompliance, including exact dates and times;
 - (3) The estimated time noncompliance is expected to continue if it has not been corrected; and
 - (4) Steps taken or planned to reduce, eliminate and prevent reoccurrence of the noncompliance.
- d. The following occurrences of unanticipated noncompliance shall be reported by telephone to the Water Quality Division, Watershed Management Section, WYPDES Program (307) 777-7781 as soon as possible, but no later than 24 hours from the time the permittee first became aware of the circumstances.

- (1) Any unanticipated bypass which exceeds any effluent limitation in the permit;
 - (2) Any upset which exceeds any effluent limitation in the permit; or
 - (3) Violation of a maximum daily discharge limitation for any toxic pollutants or hazardous substances, or any pollutants specifically identified as the method to control a toxic pollutant or hazardous substance listed in the permit.
- e. The administrator of the Water Quality Division may waive the written report on a case-by-case basis if the oral report has been received within 24 hours by the Water Quality Division, WYPDES Program (307) 777-7781.
 - f. Reports shall be submitted to the Wyoming Department of Environmental Quality at the address in Part I under Reporting and to the Planning and Targeting Program, 8ENF-PT, Office of Enforcement, Compliance, and Environmental Justice, U.S. EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129.
 - g. The permittee shall report all instances of noncompliance that have not been specifically addressed in any part of this permit at the time the monitoring reports are due.

3. Facilities Operation

The permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, as a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.

4. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to waters of the state resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. Bypass of Treatment Facilities

- a. Bypass means the intentional diversion of waste streams from any portion of a treatment facility.
- b. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of

paragraphs c. and d. of this section. Return of removed substances to the discharge stream shall not be considered a bypass under the provisions of this paragraph.

c. Notice:

- (1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice at least 60 days before the date of the bypass.
- (2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required under Part II.A.2.

d. Prohibition of bypass.

- (1) Bypass is prohibited and the administrator of the Water Quality Division may take enforcement action against a permittee for a bypass, unless:
 - (a) The bypass was unavoidable to prevent loss of life, personal injury or severe property damage;
 - (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - (c) The permittee submitted notices as required under paragraph c. of this section.

e. The administrator of the Water Quality Division may approve an anticipated bypass, after considering its adverse effects, if the administrator determines that it will meet the three conditions listed above in paragraph d. (1) of this section.

6. Upset Conditions

- a. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improper designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b. An upset constitutes an affirmative defense to an action brought for noncompliance with technology based permit effluent limitations if the requirements of paragraph c. of this section are met.

- c. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated;
 - (3) The permittee submitted notice of the upset as required under Part II.A.2; and
 - (4) The permittee complied with any remedial measures required under Part II.A.4.
- d. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

7. Removed Substances

Solids, sludges, filter backwash or other pollutants removed in the course of treatment or control of wastewaters or intake waters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering waters of the state.

8. Power Failures

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with a schedule of compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities; or
- b. If such alternative power source as described in paragraph a. above is not in existence and no date for its implementation appears in Part I, take such precautions as are necessary to maintain and operate the facility under its control in a manner that will minimize upsets and insure stable operation until power is restored.

9. Duty to Comply

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the federal act and the Wyoming Environmental Quality Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. The permittee shall give the administrator of the Water Quality Division advance notice of any planned changes at the permitted facility or of any activity which may result in permit noncompliance.

10. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

11. Signatory Requirements

All applications, reports or information submitted to the administrator of the Water Quality Division shall be signed and certified.

- a. All permit applications shall be signed as follows:
 - (1) For a corporation: by a responsible corporate officer;
 - (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively;
 - (3) For a municipality, state, federal or other public agency: by either a principal executive officer or ranking elected official.
- b. All reports required by the permit and other information requested by the administrator of the Water Quality Division shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - (1) The authorization is made in writing by a person described above and submitted to the administrator of the Water Quality Division; and
 - (2) The authorization specified either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or any individual occupying a named position.
- c. If an authorization under paragraph II.A.11.b. is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph II.A.11.b must be submitted to the administrator of the Water Quality Division prior to or together with any reports, information or applications to be signed by an authorized representative.
- d. Any person signing a document under this section shall make the following certification:

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the

system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

B. RESPONSIBILITIES

1. A. Providing Access

The permittee shall allow Department of Environmental Quality personnel and their invitees to enter the premises where the facility is located, or where records are kept under the conditions of this permit, and collect resource data as defined by Wyoming Statute § 6-3-414, inspect and photograph the facility, collect samples for analysis, review records, and perform any other function authorized by law or regulation. The permittee shall secure and maintain such access for the duration of the permit.

If the facility is located on property not owned by the permittee, the permittee shall also secure and maintain from the landowner upon whose property the facility is located permission for Department of Environmental Quality personnel and their invitees to enter the premises where a regulated facility is located, or where records are kept under the conditions of this permit, and collect resource data as defined by Wyoming Statute § 6-3-414, inspect and photograph the facility, collect samples for analysis, review records, and perform any other function authorized by law. The permittee shall secure and maintain such access for the duration of the permit.

If the facility cannot be directly accessed using public roads, the permittee shall also secure and maintain permission for Department of Environmental Quality personnel and their invitees to enter and cross all properties necessary to access the facility. The permittee shall secure and maintain such access for the duration of the permit.

B. Access Records

In the event of any change in control or ownership of this permitted discharge facility, the existing and new permittee shall complete a Notice of Transfer and Acceptance (NOTA) form, available online from WDEQ. Once submitted, WDEQ will review the proposed transfer and ensure that all outstanding permit obligations are fulfilled by the existing permittee, prior to transfer. Once fulfillment is verified, WDEQ will transfer permit ownership to the new permittee and confirm the transfer in writing.

2. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the regional administrator of the Environmental Protection Agency and the administrator of the Water Quality Division. The administrator of the Water Quality Division shall then provide written notification to the new owner or controller of the date in which they assume legal responsibility of the permit. The permit may be modified or revoked and reissued to

change the name of the permittee and incorporate such other requirements as described in the federal act.

3. Availability of Reports

Except for data determined to be confidential under Section 308 of the federal act, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Wyoming Department of Environmental Quality and the regional administrator of the Environmental Protection Agency. As required by the federal act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the federal act.

4. Toxic Pollutants

The permittee shall comply with effluent standards or prohibitions established under Section 307 (a) of the federal act for toxic pollutants within the time provided in the regulations that establish those standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

5. Changes in Discharge of Toxic Substances

Notification shall be provided to the administrator of the Water Quality Division as soon as the permittee knows of, or has reason to believe:

- a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":
 - (1) One hundred micrograms per liter (100 µg/l);
 - (2) Two hundred micrograms per liter (200 µg/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
 - (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21 (g) (7); or
 - (4) The level established by the director of the Environmental Protection Agency in accordance with 40 CFR 122.44 (f).
- b. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":
 - (1) Five hundred micrograms per liter (500 µg/l);

- (2) One milligram per liter (1 mg/l) for antimony;
- (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21 (g) (7); or
- (4) The level established by the director of the Environmental Protection Agency in accordance with 40 CFR 122.44 (f).

6. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. As long as the conditions related to the provisions of "Bypass of Treatment Facilities" (Part II.A.5), "Upset Conditions" (Part II.A.6), and "Power Failures" (Part II.A.8) are satisfied then they shall not be considered as noncompliance.

7. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

8. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties to which the permittee is or may be subject under Section 311 of the federal act.

9. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties established pursuant to any applicable state or federal law or regulation. In addition, issuance of this permit does not substitute for any other permits required under the Clean Water Act or any other federal, state, or local law.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights nor any infringement of federal, state or local laws or regulations.

11. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application should be submitted at least 180 days before the expiration date of this permit.

12. Duty to Provide Information

The permittee shall furnish to the administrator of the Water Quality Division, within a reasonable time, any information which the administrator may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the administrator, upon request, copies of records required by this permit to be kept.

13. Other Information

When the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or any report to the administrator of the Water Quality Division, it shall promptly submit such facts or information.

14. Permit Action

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

PART III

A. OTHER REQUIREMENTS

1. Percentage Removal Requirements

The arithmetic mean of the Total BOD and the Total Suspended Solids concentrations for effluent samples collected in a period of 30 consecutive days shall not exceed 15 percent of the arithmetic mean of the concentrations for influent samples collected at approximately the same times during the same period (85 percent removal). This is in addition to the concentration limitations on Total BOD, and Total Suspended Solids. In the case of stabilization pond treatment systems, this section does not apply to the parameter Total Suspended Solids.

2. Violations Resulting from Overloading

Should there be a violation of any conditions of this permit, the Wyoming Department of Environmental Quality has the authority under Sections 35-11-901 and 35-11-902 of the Wyoming Environmental Quality Act to proceed in a court of competent jurisdiction to restrict or prohibit further connections to the treatment system covered by this permit by any sources not utilizing the system prior to the finding that such a violation occurred.

3. Discharge Duration

If the rate of discharge is controlled, that rate and duration of discharge shall be reported.

4. Flow Measurement

At the request of the Administrator of the Water Quality Division, the permittee must be able to show proof of the accuracy of any flow measuring device used in obtaining data submitted in the monitoring report. The flow measuring device must indicate values of within plus or minus ten (10) percent of the actual flow being measured.

5. Sewer Overflow Located Prior to Waste Treatment Facility

Overflow structures shall be maintained and operated in such a manner that no discharge shall occur except to prevent health hazards, severe property damage or loss of treatment capacity.

Such overflows shall satisfy Wyoming water quality standards and/or any appropriate federal or state effluent limitations. Following documentation of specific water quality standard or effluent standard violations resulting from such overflows, specific numerical effluent limitations, or the requirement for elimination of the overflow structures, may be included upon reissuance or revision of this permit.

6. Compliance with Construction Grant

In the case of publicly owned treatment works, the permittee shall comply with those terms of any construction grant implementing the provisions of Section 201 (b) through (g) of the Clean Water Act.

7. 208 (b) Plans

This permit may be modified, suspended or revoked to comply with the provisions of any 208 (b) plan certified by the Governor of the State of Wyoming.

8. Reopener Provision

This permit may be reopened and modified (following proper administrative procedures) to include the appropriate effluent limitations (and compliance schedule, if necessary) or other appropriate requirements if one or more of the following events occurs:

- a. The state water quality standards of the receiving water(s) to which the permittee discharges are modified in such a manner as to require different effluent limits than contained in this permit;
- b. A total maximum daily load (TMDL) and/or watershed management plan is developed and approved by the state and/or the Environmental Protection Agency which specifies a wasteload allocation for incorporation in this permit;
- c. A revision to the current water quality management plan is approved and adopted which calls for different effluent limitations than contained in this permit;
- d. Downstream impairment is observed and the permitted facility is contributing to the impairment;
- e. The limits established by the permit no longer attain and/or maintain applicable water quality standards;
- f. The permit does not control or limit a pollutant that has the potential to cause or contribute to a violation of a state water quality standard.
- g. If new applicable effluent guidelines and/or standards have been promulgated and the standards are more stringent than the effluent limits established by the permit.
- h. In order to protect water quality standards in neighboring states, effluent limits may be incorporated into this permit or existing limits may be modified to ensure that the appropriate criteria, water quality standards and assimilative capacity are attained.

9. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended or revoked in whole or in part during its term for cause including, but not limited to, the following:

- a. Violation of any terms or conditions of this permit;
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge; or
- d. If necessary to comply with any applicable effluent standard or limitation issued or approved under Sections 301 (b) (2) (C) and (D), 304 (b) (2) and 307 (a) (2) of the federal act, if the effluent standard or limitation so issued or approved:
 - (1) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
 - (2) Controls any pollutant not limited in the permit.

10. Toxicity Limitation - Reopener Provision

This permit may be reopened and modified (following proper administrative procedures) to include a new compliance date, additional or modified numerical limitations, a new or different compliance schedule, a change in the whole effluent protocol or any other conditions related to the control of toxicants if one or more of the following events occur:

- a. Toxicity was detected late in the life of the permit near or past the deadline for compliance;
- b. The toxicity reduction evaluation (TRE) results indicate that compliance with the toxic limits will require an implementation schedule past the date for compliance and the permit issuing authority agrees with the conclusion;
- c. The TRE results indicate that the toxicant(s) represent pollutant(s) that may be controlled with specific numerical limits and the permit issuing authority agrees that numerical controls are the most appropriate course of action;
- d. Following the implementation of numerical controls on toxicants, the permit issuing authority agrees that a modified whole effluent protocol is necessary to compensate for those toxicants that are controlled numerically;
- e. The TRE reveals other unique conditions or characteristics which, in the opinion of the permit issuing authority, justify the incorporation of unanticipated special conditions in the permit.

11. Severability

The provisions of this permit are severable and if, any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit, shall not be affected thereby.

12. Penalties for Falsification of Reports

The federal act provides that any person who knowingly makes any false statement, representation or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation or by imprisonment for not more than two (2) years per violation or both.

B. INDUSTRIAL WASTES

1. Industrial Waste Management

- a) The Permittee has the responsibility to protect the Publicly-Owned Treatment Works (POTW) from pollutants which would inhibit, interfere, or otherwise be incompatible with operation of the treatment works including interference with the use or disposal of municipal sludge.
- b) Pretreatment Standards (40 CFR Section 403.5) developed pursuant to Section 307 of the Federal Clean Water Act (the Act) require that the Permittee shall not allow, under any circumstances, the introduction of the following pollutants to the POTW from any source of nondomestic discharge:
 - i) Any pollutant which may cause Pass Through or Interference;
 - ii) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, waste streams with a closed cup flashpoint of less than sixty (60) degrees Centigrade (140 degrees Fahrenheit) using the test methods specified in 40 CFR Section 261.21;
 - iii) Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with a pH of lower than 5.0 s.u., unless the treatment facilities are specifically designed to accommodate such discharges;
 - iv) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW, or other interference with the operation of the POTW;
 - v) Any pollutant, including oxygen demanding pollutants (e.g., BOD), released in a discharge at a flow rate and/or pollutant concentration which will cause Interference with any treatment process at the POTW;
 - vi) Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds forty (40) degrees Centigrade (104 degrees Fahrenheit)

unless the Approval Authority, upon request of the POTW, approves alternate temperature limits;

- vii) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause Interference or Pass Through at the POTW;
 - viii) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
 - ix) Any trucked or hauled pollutants, except at discharge points designated by the POTW; and
 - x) Any specific pollutant which exceeds a local limitation established by the Permittee in accordance with the requirements of 40 CFR Section 403.5(c) and (d).
- b) EPA shall be the Approval Authority and the mailing address for all reporting and notifications to the Approval Authority shall be: Office of Enforcement, Compliance, and Environmental Justice - Water (8ENF-W-NP), USEPA - Region VIII, 1595 Wynkoop, Denver, CO 80202. Should the State be delegated authority to implement and enforce the Pretreatment Program in the future, the Permittee shall be notified of the delegation and the **Wyoming DEQ/WQD** shall become the Approval Authority.
- d) In addition to the general limitations expressed above, more specific Pretreatment Standards have been and will be promulgated for specific industrial categories under Section 307 of the Act (40 CFR Parts 405-471, 40 CFR chapter I, subchapter N.).
- e) The Permittee must notify the Approval Authority, of any new introductions by new or existing industrial users or any substantial change in pollutants from any industrial user within sixty (60) days following the introduction or change, as required in 40 CFR 122.42(b)(1-3). Such notice must identify:
- (i) Any new introduction of pollutants into the POTW from an industrial user which would be subject to Sections 301, 306, and 307 of the Act if it were directly discharging those pollutants; or
 - (ii) Any substantial change in the volume or character of pollutants being introduced into the POTW by any industrial user;
- (iii) For the purposes of this section, adequate notice shall include information on:
- (1) The identity of the industrial user;
 - (2) The nature and concentration of pollutants in the discharge and the average and maximum flow of the discharge to be introduced into the POTW; and
 - (3) Any anticipated impact of the change on the quantity or quality of effluent to be discharged from or biosolids produced at such POTW.
- (iv) For the purposes of this section, a significant industrial user shall include:

- (1) Any discharger subject to Categorical Pretreatment Standards under Section 307 of the Act and 40 CFR chapter I, subchapter N;
 - (2) Any discharger which has a process wastewater flow of 25,000 gallons or more per day;
 - (3) Any discharger contributing five percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant;
 - (4) Any discharger who is designated by the Approval Authority as having a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standards or requirements;
- f) At such time as a specific pretreatment limitation becomes applicable to an industrial user of the Permittee, the **Wyoming DEQ/WQD** and/or Approval Authority may, as appropriate:
- (i) Amend the Permittee's **WYPDES** discharge permit to specify the additional pollutant(s) and corresponding effluent limitation(s) consistent with the applicable Pretreatment Standards; or,
 - (i) Amend the Permittee's **WYPDES** discharge permit to require the Permittee to develop and submit an approvable Pretreatment program under a compliance schedule, in accordance with procedures in 40 CFR 403.8(e). The modification of a POTW's NPDES Permit for the purposes of incorporating a POTW Pretreatment Program approved in accordance with the procedure in §403.11 shall be deemed a minor Permit modification subject to the procedures in 40 CFR 122.63(g); or,
 - (ii) Require the Permittee to specify, by ordinance, order, or other enforceable means, the type of pollutant(s) and the maximum amount which may be discharged to the Permittee's POTW for treatment. Such requirement shall be imposed in a manner consistent with the POTW program development requirements of the General Pretreatment Regulations at 40 CFR Part 403; and/or,
 - (iii) Require the Permittee to monitor its discharge for any pollutant which may likely be discharged from the Permittee's POTW, should the industrial user fail to properly pretreat its waste.
- g) The Approval Authority retains, at all times, the right to take legal action against any source of nondomestic discharge, whether directly or indirectly controlled by the Permittee, for violations of a permit, order or similar enforceable mechanism issued by the Permittee, violations of any Pretreatment Standard or requirement, or for failure to discharge at an acceptable level under national standards issued by EPA under 40 CFR, chapter I, subchapter N. In those cases where a **WYPDES** permit violation has occurred because of the failure of the Permittee to properly develop and enforce Pretreatment Standards and requirements as necessary to protect the POTW, the Approval Authority shall hold the Permittee and/or industrial user responsible and may take legal action against the Permittee as well as the industrial user(s) contributing to the permit violation.

END OF PERMIT

APPENDIX D – Aeration System Technical Memorandum

TECHNICAL MEMORANDUM

Forced Air Lagoon Aeration System Options

Town of Jackson

Prepared by: Rika Lashley

Date: March 16, 2026

Morrison-Maierle
Helena Office

1 GENERAL

This technical memorandum summarizes available options for lagoon aeration systems that use forced air and fine-bubble diffusers. The existing floating mixer/aerators are not discussed since operators are familiar with their maintenance requirements. It has been noted that the larger spacing of the floating mixer/aerators when compared to the diffuser assemblies described below, leads to excessive sludge deposition in dead spots between mixer/aerators. Oxygen transfer efficiency may be similar as measured for some fine-bubble diffusers but the sludge mounds observed by operators indicate that there are areas in the lagoon cells that are not reached well by the oxygenated flow. Floating mixer/aerators may have lower mixing energy requirements than if mixing is supplied by forced air.

2 AIR LATERAL TYPES

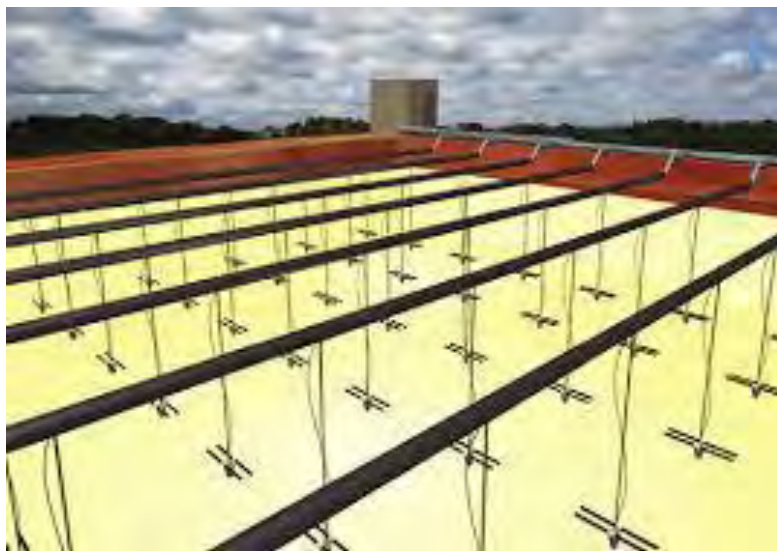
Fine bubble diffused air systems for lagoons come in three basic types:

1. Floating Laterals with Suspended Diffuser Assemblies
2. Submerged Laterals with Diffusers Sitting on Bottom
3. Individual Feeder Tubes with Diffusers Sitting on Bottom

The following presents characteristics and operational considerations for each system.

2.1 Floating Laterals with Suspended Diffusers Assemblies

Figure 1: Floating Laterals with Suspended Diffuser Assemblies



Source: Environmental Dynamics Inc. (2011). EDI Floating Lateral Lagoon Aeration System Specification Sheet. Retrieved from https://cms.esi.info/Media/documents/EDI_Floatlagoon2011_ML.pdf

Forced-Air Lagoon Aeration Systems

- Several laterals branch off into the basin from a common air header.
- 3 to 4-inch HDPE pipe with 1-inch to 2-inch feeder tubing from lateral to diffuser assembly.
- Suspended diffuser assemblies:
 - Equal submergence for all diffusers – equal air distribution.
- Install in a full or empty basin.
- Retrieval for service:
 - Access by boat.
 - Locate the diffuser by finding the buoy attached to the retrieval rope and pull up using the rope tied to the lateral; ropes can become worn and detached; maintenance should include periodic checks on the ropes and replacement if they become worn or weathered.
 - Lift into the boat for service .
- The entire lateral can be removed from the cell for sludge removal.
- Allows for installation of spare risers that facilitate the addition of laterals in the future or moving laterals to different positions without draining the lagoon cells.
- Tend to act as garbage catchers and bird supports.
- In the way of maneuvering a boat during diffuser maintenance or sludge judging.
- More research is needed to identify maximum lateral length requirements and effects of wind or ice action for very long laterals.

2.2 Submerged Laterals with Diffusers Sitting on Lagoon Bottom

Figure 2: Submerged Laterals with Diffusers Sitting on Bottom



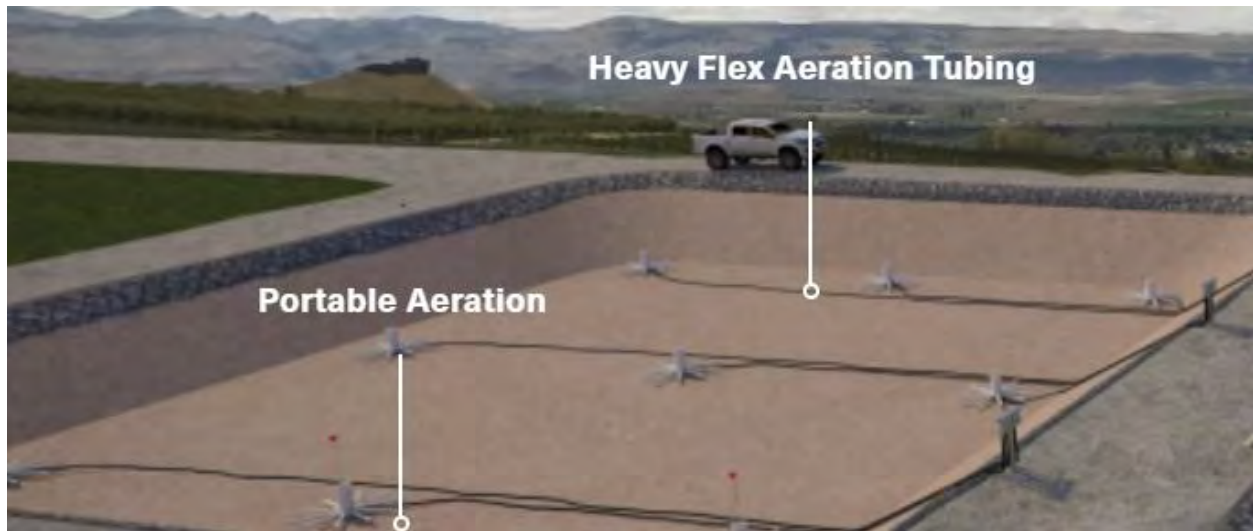
Source: Morrison-Maierle, Gardiner WWTF, 2024. Nexom|EDI Aeration System.

Forced-Air Lagoon Aeration Systems

- Diffusers sit on the lagoon bottom.
 - Diffuser assemblies sitting on a sloping bottom will sit at different elevations – potentially delivering uneven air distribution.
 - Install in an empty basin only.
 - Retrieval for service:
 - Access by boat.
 - Diffuser assembly retrieval rope has a buoy attached for locating of the rope and assembly; for dense installation, it may be difficult to know which buoy belongs to which assembly.
 - Manufacturers recommend buoy installation about 2 feet below the water surface to prevent ice buildup from tearing buoys or moving diffuser assemblies.
 - Water level needs to be lowered to locate buoys and lift assemblies.
 - Buoys can get detached, requiring the water level to be significantly lowered to retrieve assemblies with a long hook. Routine maintenance should include checking the attachments of the buoys, which is only possible while lowering the water level to expose the buoys.
 - Cannot be removed from the cell for sludge removal, and will, therefore, limit sludge removal methods.
 - No option for installation of future laterals or moving laterals without draining the lagoon cell .
 - Will not catch debris.
 - No obstacles when maneuvering a boat in the cell during diffuser maintenance or sludge judging.
 - In very deep cells, the feeder tubing must be long enough to accommodate lifting the assembly to the surface. This can cause assemblies to become entangled if they migrate for any reason.
-

2.3 Individual Feeder Tubes with Diffuser Assemblies Sitting on Bottom

Figure 3: Individual Feeder Tubes with Diffuser Assemblies Sitting on Bottom



Source: Triplepoint Environmental Website, accessed 11/19/2025 at <https://lagoons.com/lagoon-technologies/ares-aerator/>.

Figure 4: Maintenance on Diffuser Assembly with Individual Feeder Tube



Source: Morrison-Maierle, Sun Prairie Village WWTF, Diffuser Maintenance 2025. Triplepoint Diffuser Assembly.

- Dedicated feeder tube from a manifold on the lagoon bank to each diffuser assembly.
- 1.5-inch naturally sinking tubing (no weights required).
- Diffusers sit on the lagoon bottom.

- o Diffuser assemblies sitting on a sloping bottom will sit at different elevations – potentially delivering uneven air distribution; the manufacturer offers pedestals at different heights to mitigate some of this effect.
- Install in a full or empty basin.
- Retrieval for service:
 - o Access by boat.
 - o Diffuser assembly retrieval rope has a buoy attached for easy locating of the rope and assembly; regular checks on rope integrity should be part of routine maintenance.
 - o Buoys may be floating at the water surface because the assemblies can move with ice; however, spring maintenance may need to realign positions.
 - o Buoys can get detached, and routine maintenance needs to include checking the attachments of the buoys.
- Feeder tubing and diffuser assembly can be removed from the cell for sludge removal.
- Allows for installation of spare ports at the manifold that facilitate the addition of diffuser assemblies in the future or moving them to different positions without draining the lagoon cells.

In lagoons with very uneven bottom elevations, floating laterals may be preferred to ensure even and consistent air distribution. In new lagoons with mildly and evenly sloping bottoms, the elevation differences of the bottom and associated submergence differences for diffusers can be acceptable. In very large lagoon basins, a two percent bottom slope can result in significant elevation differences, and floating laterals or diffuser pedestals are recommended.

3 DIFFUSER ASSEMBLY TYPES

Static-tube coarse-bubble diffusers were not included in this comparison because they are less energy efficient than the presented options, even though they are maintenance-free, which is a great advantage. The presented options offer higher oxygen transfer efficiencies than static tube diffusers and have the potential for reducing power costs; however, they do require periodic maintenance.

3.1 Fine-Bubble Diffuser Assembly

Figure 5: Fine-Bubble Diffuser Assembly



Source: Morrison-Maierle, Gardiner WWTF, 2024. Nexom|EDI Diffuser Assembly.

- Used with floating or submerged lateral systems.
- Individual diffuser tubes consist of a plastic tube supporting a flexible rubber membrane “sock” with very small slits for air diffusion. Air travels between the “sock” and the pipe and exits through the slits. When no air is flowing, the membrane seats on the tube, minimizing intrusion of wastewater or sludge into the diffuser. The tube length varies by manufacturer, with a typical length of four feet.
- Assembly has two or four diffuser tubes, about four feet long each.
- Can be installed close to each other, which provides good floor coverage.
 - Good floor coverage reduces the chance of short-circuiting and improves mixing in the area of the diffusers.
 - Close installation when using submerged lateral systems can lead to entanglement if assemblies migrate for any reason.
- Fewer tubes per assembly require a higher number of individual assemblies, which in turn means more individual assemblies to retrieve for membrane maintenance.
- More tubes per assembly reduce floor coverage; fewer assemblies to retrieve for maintenance.

3.2 Combined Coarse-Bubble and Fine-Bubble Diffuser Assembly

Figure 6: Combined Coarse-Bubble and Fine-Bubble Diffuser Assembly (Tiplepoint)



Source: Morrison-Maierle, Sun Prairie Village WWTF, 2023. Tiplepoint ARES Diffuser Assembly.

- Used with individual feeder tubing.
- Typically has ten diffuser tubes, about four feet long each, radiating out from a small central static tube diffuser.
- Can maintain greater space between diffusers or provide high density if needed.
 - At greater installation distances, potential for short-circuiting exists.
 - At higher densities, total air flow may exceed that of the fine-bubble assemblies described above.
- Mixing is induced through coarse-bubble effects that cause a vertical “roll” around each assembly at about a 125-foot radius.
- Lower number of individual assemblies, which in turn means fewer but heavier assemblies to retrieve for membrane maintenance.
- Vertical adjustment (pedestals) available for mitigating sloping lagoon bottom effects.

3.3 General Considerations

Two to four-tube fine-bubble diffuser assemblies are recommended for large lagoon basins, particularly when paired with floating laterals. Good floor coverage—combined with even air

distribution—creates ideal conditions for avoiding short-circuiting, providing good mixing, and efficiently transferring oxygen to the water column.

In very small lagoon basins, the ratio of the water surface area above the berms to the area above the lagoon bottom can be greater than 1. This means that the area where the diffusers are sitting can be less than half of the total water surface area. This leaves a large area (and relative volume) where there is no apparent aeration/mixing. In those cases, the combined coarse-bubble/fine-bubble diffuser has the advantage of having a greater mixing influence on the surrounding area, including over slopes. An assembly at the toe of the berm will more effectively entrain water above the berm and help with mixing and oxygenation of the water above the berms. While assemblies may be spaced farther apart, those distances are already short in small basins, and the adverse effects of potential short-circuiting are not as great.

The Jackson lagoon Cells 1 and 2 have water surface widths of 385 to 390 feet. At this width, the bottom to berm ratio is so large that the mixing advantage of the combination diffuser assembly is negligible. Diffuser preference can be based on operator preference.

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Internal Services	Presenter:	Roxanne Robinson
Agenda Item:	Resolutions 26-15, 26-16, and 26-17 Amendments to Policy Manuals	Public Comment:	Yes

Purpose or Policy Considerations.

The purpose of this item is for Council to approve amendments to the Town's three Policy Manuals, for General Employees, Transit Related Employees, and Victim Services Employees. The Policy Manuals, and any amendments, are adopted by Resolution of the Town Council and establish broad policies related to employment and, in some cases, more specific operational and procedural elements recommended for inclusion due to best practices or human resources legal advice.

Recommendations.

Staff recommend Council approve Resolutions 26-15, 26-16, and 26-17 adopting amendments to the Policy Manual for General Employees, the Policy Manual for Transit Related Employees, and the Policy Manual for Victim Services Employees as presented.

Background.

The Policy Manual is a document that combines various policies protecting and affecting employees related to multiple areas including harassment, accommodation, resolution of complaints, paid and unpaid leave, pay, attendance and remote work, discipline, use of facilities, social media, use of AI, communication and network systems, and similar types of policies. Due to federal and state grant requirements, slightly different Policy Manuals are necessary for transit related employees and victim services employees. Updated Policy Manuals were adopted in March of 2025 and these are the first amendments to those manuals.

The Policy Manuals are being updated to:

1. Formalize policies that have evolved since original adoption,
2. Clarify policies where questions have arisen since original adoption,
3. Ratify several temporary policies approved by the Town Manager, as allowed for in the Policy Manual, that have been enacted or expanded since original adoption in March of 2025,
4. Make changes to policies,
5. Fix errors identified in the original policies, and
6. Track update history.

Staff began work on amendments to the Policy Manuals immediately after they were adopted in March of 2025. Staff reviewed the proposed amendments with Department Directors and provided time for input on the amendments by employees.

Analysis & Key Questions.

Notable amendments to the Policy Manuals are shown in the table attached to this staff report. Detailed changes to the Policy Manuals are shown in an attached document showing redline changes for each section proposed for amendments. Because the updates being proposed are uniform across all three policies, only the redline version for the Policy Manual for General Employees is attached.

The most significant substantive change is the addition of shift differentials for snow removal operations and for street sweeping. These differentials recognize that these operations frequently require employees to work outside normal business hours. The estimated annual fiscal impact is \$16,440 combined, \$12,960 for snow removal and \$3,480 for street sweeping, and funding for both was incorporated into the FY27 budget Council already approved. These estimates do not include potential overtime impacts, which will depend on actual operational conditions each season.

Upon completion, the updated Policy Manuals will be distributed, employees will execute acknowledgements of receipt, and ongoing education and training will be provided to employees.

Key Question #1. Does the Town Council support the amendments to the Policy Manuals as presented, including the shift differentials for snow removal and street sweeping?

Staff recommends yes. The amendments are the product of a thorough review process, address known gaps and questions that have arisen since March 2025, and the fiscal impacts of the substantive changes are already budgeted. The Notable Amendment Table and redline version provide Council with full visibility into every change before voting.

Key Question 2: Does Council have questions or concerns about any specific amendment before approving the resolutions?

Staff welcomes Council questions and input into the Policy Manuals. The current Town of Jackson Policy Manuals and any temporary policies approved by the Town Manager, remain in place and effective until changed.

Possible Alternatives.

The first alternative is Council can choose to delay approval of the proposed amendments until a later date and/or provide input into further amendments. The current Policy Manuals and any temporary policies enacted by the Town Manager remain in place and effective until changed. However, delay means temporary policies approved by the Town Manager remain in temporary rather than ratified status, which is not a preferred long-term arrangement. Staff does not recommend delay given the thoroughness of the review process completed.

The second alternative is to approve some amendments and defer others. If Council has concerns about a specific provision, such as the shift differential amounts or the scope of a particular policy change, Council could direct staff to bring that specific item back separately while approving the remainder. Staff could support this alternative if Council identifies a specific concern that warrants further review.

Comprehensive Plan & Priority Alignment.

The ability of the Town of Jackson to implement and take actions aligned with the Comprehensive Plan depends on the ability to recruit and retain an effective workforce. Establishing policies that create a positive working environment that leads to recruitment and retention of employees is aligned with Common Value #3, Quality of Life, and directly relates to:

Section 8: Quality Community Service Provision. Timely, efficiently and safely deliver quality services and facilities in a fiscally responsible and coordinated manner.

Fiscal Impact.

There is no direct fiscal impact related to updating the Policy Manuals. There are fiscal impacts associated with the shift differential for snow removal operations and street sweeping. The annual estimated increase for the shift differential for snow removal operations is \$12,960 and the annual estimated increase for the shift differential for street sweeping is \$3,480. These estimates do not include any impacts to overtime that may occur. Funding for these shift differentials was incorporated into the FY27 budget and approved. Training operators in Transit is normally conducted by Supervisors and any fiscal impact associated with the shift differential for training time in Transit would be minimal and dependent upon available supervisor staffing.

Staff Impact.

The staff impact of this project has been approximately 110 hours with the bulk of that time spent by the Director of Internal Services and additional time spent by Department Directors, and employees. Staff impact after adoption is estimated at an additional 20 hours including updated page numbering; distribution of the updated Policy Manuals; signing, collecting, and tracking executed acknowledgements of receipt; posting documents, and conducting follow up educational sessions with employees.

Attachments or Links.

Policy Manual Notable Amendment Table.

Policy Manual Amendments Redline Version for General Employees.

Resolution 26-15 A Resolution Adopting Amendments to the Policy Manual for General Employees with exhibits.

Resolution 26-16 A Resolution Adopting Amendments to the Policy Manual for Transit Related Employees with exhibits.

Resolution 26-17 A Resolution Adopting Amendments to the Policy Manual for Victim Services Employees with exhibits.

Suggested Motion.

I move to approve Resolutions 26-15, 26-16, and 26-17 adopting amendments to the Policy Manual for General Employees, the Policy Manual for Transit Related Employees, and the Policy Manual for Victim Services Employees as presented.

Policy Manual Notable Amendments		
Policy Item	Current	Amended
Paid Time Off (PTO) - Holiday Wages Wording	Stated as Holiday Wages and Causes Confusion Regarding Time Worked	Stated as Holiday Stipend To Avoid Any Confusion Regarding Time Worked
PTO - Holiday Wages	As stated only applies to Full-Time Transit Operators	Applies to Full-Time Transit Operators AND Supervisor/Dispatchers
PTO - Work-Related Injury Leave First 3 Days	Always applies to First 3 Days	Only Applies to First 3 Days if 8 days or Less Overall
Call-In Pay	Paid at the Regular Rate of Pay Unless Over 40 in the Week	2 Hours Paid at OT Rate Guaranteed + Time Spent Over 2 Hours at OT Rate
Shift Differentials & Special Rates of Pay	Only 3 Types of Shift Differentials	Added Shift Differentials for Police Officers Serving as FTO, Transit Operators Training Other Operators, Snow Removal Operations & Street Sweeping Operations
Non-Town Employee Passengers in Vehicles	Not Broad Enough for Police Work or Transit Services	Allows Non-Town Employee Passengers if they are associated with Town Business or Any Services Provided by the Police Department
Commuter Authorization	Not Authorized for Public Works Critical Response Managers	Provides Flexibility for Town Manager to Expand Commuter Authorization to Public Works Critical Response Managers
Wash Bay - Access	Does Not Include Drivers of all County Vehicles or Outside Vehicles Maintained by Town	Includes Access for Drivers of All County Vehicles and Drivers of Outside Vehicles Maintained by Town
Pets and Animals	Flexibility Limited for Appointments & Liability Assumed But Not Clearly Stated	More Flexibility for Appointments Provided & Employee Liable for Damage and/or Injury
Reporting of Personal Service of Subpoena, Civil Suit or Criminal Charges	Only Required for Police Department Employees if Affects Attendance, Ability to Perform Job, Employment, or Town Reputation	Always Required for Police Department Employees
Use of AI	Developed Prior to Full Understanding of Capabilities and Use	Encompasses Greater Understanding and Parameters for Use

AMENDMENTS TO THE POLICY MANUAL FOR GENERAL EMPLOYEES - REDLINE

Unless shown below, all previously adopted sections of the Policy Manual for General Employees shall remain unchanged with the exception of the Table of Contents, the resolution update history for each section, and the page numbering.

402. Paid Leave Table

Paid Leave Table	
Paid Time Off (PTO) for Positions with Holiday, Vacation, & Sick Combined	Hours
First Year	240
1 Year Completed	240
2 Years Completed	240
3 Years Completed	240
4 Years Completed	240
5 Years Completed	296
6 Years Completed	306
7 Years Completed	306
8 Years Completed	306
9 Years Completed	306
10 Years Completed	316
11 Years Completed	316
12 Years Completed	316
13 Years Completed	316
14 Years Completed	316
15+ Years Completed	336
Paid Time Off (PTO) for Positions with Vacation & Sick Combined + Separate Holiday Wages Stipend	Hours
First Year	152
1 Year Completed	152
2 Years Completed	152
3 Years Completed	152
4 Years Completed	152
5 Years Completed	208
6 Years Completed	218
7 Years Completed	218
8 Years Completed	218
9 Years Completed	218
10 Years Completed	228
11 Years Completed	228
12 Years Completed	228
13 Years Completed	228
14 Years Completed	228
15+ Years Completed	248
Other	Hours or Days
PTO Use Required for Dependent Leave or Sustainment Leave Eligibility	24
PTO Buyout Maximum	40
PTO Paid for Cancellation of Pre Approved PTO	40
Dependent Leave	80
Funeral Leave Regular/Extensive Travel/Death of a Child 21 or Under	24/40/80
Work-Related Injury Leave Prior to Worker's Comp If Total Work-Related Injury Leave is 8 Days or Less	24-3 days
Emergency Service Leave	250
Reserve and Guard Duty Leave	250

Reso 26-15, Reso 25-05

403. Paid Time Off (PTO)

The Town of Jackson combines holidays, vacation, and sick leave into Paid Time Off (PTO) for full-time and part-time employees, except for full-time transit operators and transit system supervisor/dispatchers. Full-time transit operators and transit system supervisor/dispatchers receive combined vacation and sick leave into PTO as noted in the paid leave table and are provided an 8 hours holiday stipend at their regular rate of pay of paid holiday wages for each holiday as it occurs regardless of time worked during that week or on that holiday. All paid leave, whether PTO or other, is provided at the employee's base rate of pay.

PTO provision, expiration, and scheduling. PTO is provided on the employee's hire date and each year thereafter on their hire date anniversary. References to 'year' in the employee benefits section, unless specified, refers to the year between hire date anniversaries. PTO expires the day prior to the employee's hire date anniversary. Part-time employees are currently eligible for PTO benefits proportional to the number of budget authorized hours.

PTO is granted in a manner that minimizes interruptions to the operations of the Town. PTO days are to be planned and scheduled in advance whenever possible. Employees showing up for work are required to be physically and mentally able to work and are required to notify their supervisor if they are not physically or mentally able to perform their full duties. Employees that come to work obviously ill or injured or their obvious illness or injury may lead to others getting ill or injured, may be sent home at the discretion of their Department Director and required to utilize PTO. In the event the employee is absent for 4 or more workdays due to an illness or injury, medical certification may be required. The Town reserves the right to send an employee to a doctor of the Town's choosing at the Town's expense. The Town does not retaliate against an employee for utilizing unplanned PTO for an injury or illness.

PTO approval and use. Employees are encouraged to meet with their supervisor on their hire date anniversary to discuss and receive approval for planned PTO throughout the coming year. Use of PTO for full or partial days requires Department Director pre-approval except in the instance of utilizing PTO for unplanned instances. Employees must notify their supervisor each day at the beginning of their shift when they cannot come to work because of unplanned PTO use including illness, injury, birth of their child, medical care or other similar unplanned situation. Employees utilizing unplanned PTO shall inform their supervisor when they expect to return to work. PTO use during an employee's last 80 hours of work requires approval from the Director of Internal Services and the Town Manager.

The Town Manager may send staff home on a temporary basis for operational reasons and require staff to utilize PTO.

Net PayLeave. Full-time non-exempt employees that do not work 40 hours in a week (or 80 hours in a 2-week period for 7k exemption employees) are required to utilize PTO hours necessary to bring their hours to 40 (or 80 for 7k exemption employees). Part time non-exempt employees that do not work their regular schedule of hours in a week are required to utilize PTO hours necessary to bring their hours to their regular schedule of hours. Employees are only paid PTO hours necessary to bring their paid hours to their full schedule unless the employee indicates 'No Net Pay-Leave' on their time sheet during a 40/80 hour pay period where they intended to take PTO and ended up working extra hours on other

days in that period. In that instance, a non-exempt employee will be paid for a full scheduled day of PTO time in addition to their hours worked during that period.

PTO buyback. The Town pays employees their unused PTO existing the day prior to their hire date anniversary up to the maximum noted in the paid leave table, unless they have used a portion of hours of other paid leave during the year, except for emergency service leave or reserve and guard duty. The Town pays employees up to the maximum hours of PTO noted in the paid leave table, if their pre-approved PTO was cancelled by the Town Manager due to operational needs. There is no PTO payout upon separation of employment.

Additional provisions. Upon the death of a Town employee, the Town pays a maximum of 40 hours of any remaining PTO.

Employees on a period of approved, planned PTO are not authorized to work during that period without specific director pre-approval, and for directors, without Town Manager pre-approval. The exception to this rule is if there is an emergency situation.

Reso 26-15, Reso 25-05

407. Funeral Leave

Department Directors are authorized to grant funeral leave as described. In the event of a death in their immediate family, full- and part-time employees are granted paid funeral leave noted in the paid leave table to attend a funeral or memorial service. If extensive travel is required or in the event of the death of a child 21 or younger, additional hours are granted as noted in the paid leave table. For the purposes of this supplemental leave, immediate family is defined as spouse, siblings, parents, children, grandparents, grandchildren, mother and father in-law, and eligible partners as defined in an Affidavit of Domestic Partnership for health care coverage. In the event of the death of a near relative, full and part-time employees are granted up to one paid day to attend a funeral. Near relatives include the employee's aunts, uncles, nieces, nephews, and their spouse's or partner's grandparents, brothers, sisters, and other close relatives. For funerals of friends, employees may take PTO or unpaid leave with approval of their Department Director.

Reso 26-15, Reso 25-05

409. ~~Work~~-Related Injury Leave

For work related injuries where a doctor's note is provided and the employee has completed requisite worker's comp documentation, full and part-time employees are provided paid work-related injury leave. Employees may decline work-related injury leave retroactively 30 days prior to the end of the year, and in that instance, PTO will be deducted for that period of leave instead of work-related injury leave. Employees utilizing work-related injury leave must present a medical provider's statement indicating ability to return to work.

Reso 26-15, Reso 25-05

416. Administrative Leave/Suspension

Paid Administrative Leave/Paid Suspension. Employees may be placed on immediate paid administrative leave/paid suspension by their supervisor or Department Director. ~~Supervisors must immediately notify their Department Director if they place an employee on paid administrative leave/paid suspension. Any occurrence must be followed up with timely documentation to the Director of Internal Services.~~ The duration of the paid administrative leave/paid suspension requires approval by the Director of Internal Services. ~~Prior to commencement of paid administrative leave/paid suspension, employees may be required to return all Town equipment, uniforms, and keys and Employees~~ may also be denied access to Town facilities and networks for the duration of their paid administrative leave/paid suspension.

Unpaid Administrative Leave/Unpaid Suspension. Unpaid administrative leave or unpaid suspension is a separate type of leave and is considered a disciplinary action.

Reso 26-15, Reso 25-05

505. Call-In Pay

~~Non-exempt employees may be called in from standby to perform work. Two hours of call-in, at the premium rate of one and one-half times the employee's base rate, is paid regardless of whether the work exceeds 40/80 hours. Any work performed in excess of 2 hours is paid at the premium rate of one and one-half times the employee's base rate regardless of whether the work is in excess of 40/80 hours. Employees are compensated for their call-in time.~~ Failure to respond to a call or message during the employee's designated ~~standby~~ call time may result in discipline. ~~Non-exempt called-in employees are paid at their regular rate of pay for any time worked while on call, as specified in this policy. Employees are paid any applicable overtime rate if the time spent carrying out assigned duties during the call-in time qualifies as overtime hours.~~

Reso 26-15, Reso 25-05

512. Shift Differentials and Special Rates of Pay

To address specific purposes or provide incentives, the Town provides the following types of hourly shift differentials and special rates of pay to eligible employees in amounts approved by the Town Manager.

Police Officers – Driving Under the Influence (DUI), Enforcing Underage Drinking Laws (EUDL), and Highly Visible Enforcement (HVE)

Law enforcement work related to alcohol compliance and violations is of particular importance to the Wyoming Department of Transportation and the Wyoming Association of Sheriffs and Chiefs of Police and they are therefore incentivizing local governments to perform extra work in these areas by providing grant funds. Police Officers are provided a ~~shift differential~~ special rate of pay for work performed under this grant when marked on their time sheet as such.

Police Officers – Airport Duty

Airport duty is specialized work for Police Officers that requires a sworn officer be present but that is at a very different pace than regular law enforcement work in the Town of Jackson. Police Officers are provided a shift differential for work performed at the Jackson Hole Airport.

Police Officers – Performing Field Training Officer (FTO) Duties

FTO duties are critically important for training new officers and are usually performed by sworn officers with a rank of Corporal or above. Police Officers are provided a special rate of pay for work performed as an FTO.

Transit Operators – Commuter Route Driving

Operation of a START Bus through the Snake River Canyon and over Teton Pass, in heavy traffic and frequently in poor driving conditions can be hazardous and treacherous. Transit Operators are provided a shift differential for routes driven through the Snake River Canyon and over Teton Pass.

Transit Operators – Training Other Operators

Training Transit Operators while serving in a non-supervisory role is a higher level of responsibility. Transit Operators are provided a shift differential for work performed while training other Transit Operators.

Public Works Operators - Snow Removal Operations

Snow removal operations occur in the dark, during the winter, and frequently in challenging weather conditions. Public Works personnel performing snow removal operations, during shifts starting at 2:30AM or earlier on specific dates between November 1 and April 15 approved by the Public Works Director or their designee, are provided a shift differential.

Public Works Operators - Street Sweeping Operations

Street sweeping operations are conducted early, often in the dark, and require attention to detail with vehicles parked on the street. Public Works personnel performing street sweeping operations during shifts starting at 2:30AM or earlier are provided a shift differential.

Reso 26-15, Reso 25-05

612. Employee Ethics and Conflicts of Interest

Employees are held to a high ethical standard and expected to act accordingly. Employees shall comply with the Jackson Municipal Code as it relates to conflicts of interest. Employees can obtain a copy of excerpts from the Municipal Code regarding conflicts of interest on the Town's intranet, the internet, or from the Internal Services Department.

~~Employees are expected to protect Town information and avoid outside activities or relationships that do or could improperly influence their decisions or actions on the job.~~

If employees have any questions about whether a situation is an ethical concern or a conflict of interest, they should refer the matter to the Director of Internal Services and/or the Town Attorney for final determination.

Reso 26-15, Reso 25-05

616. References

The Town does not furnish open letters of recommendation addressed "To Whom It May Concern."

If ~~an~~ employees receives ~~an inquiry-a call inquiring or referenc request regarding-about~~ a former or current employee, ~~theyemployees~~ are asked to refer ~~that requestthe caller~~ to Internal Services. Only the Director of Internal Services or their designee has the authority to respond to such inquiries. This ~~restriction~~ includes all types of references including, but not limited to recommendations-on-verbal, written, electronic and social media-sites.

Reso 26-15, Reso 25-05

619. Use of Town Property

Town property shall be used and cared for responsibly. Use of Town property is limited to Town purposes except for the following instances expressly permitted in this Policy Manual and limited to Town employees unless expressly authorized:

- Town mechanics utilizing the fleet maintenance work bays and limited tools and equipment of the Town to work on personal vehicles while not working.
- Use of printers/copiers for personal printing/copying/faxing so long as fees are paid for copies or printing with the exception of the first 5 pages.
- Vehicles as outlined in Section 620.
- Wash bay use as outlined in Section 621.
- Basement exercise facility use as outlined in Section 622.
- Use of Town phones, computers and equipment as outlined in Section 7 Communications.
- Use of common supplies for personal reasons including Kleenex, toilet paper, and other similar items.

Reso 26-15, Reso 25-05

620. Vehicles, Electric Bicycles, and Accidents/Collisions

Town vehicles shall only be used for Town purposes except for:

- incidental stops while traveling to and from official Town business,
- incidental travel (approximately 20 miles or less in total) for personal reasons that deviates from travel for Town purposes while traveling outside the community for Town business,
- authorized commuting,
- travel to and from the gym to work out (sworn law enforcement personnel residing in Teton County only).

Town vehicles include cars, trucks, equipment, and motorcycles. No person other than a Town employee, elected official, or appointed board member may operate a Town vehicle or electric bicycle. Federal, state, and local laws shall be followed at all times for vehicle and bicycle use and safe, prudent, and courteous behaviors are expected. Unnecessary idling shall be avoided. Failure to provide immediate notification to the employee's Department Director and the Director of Internal Services when there is a change in driver's license validity, class or endorsements is prohibited.

Non-Town Employee Passengers

Non-Town employee passengers are prohibited on electric bicycles. Non-Town employee passengers are prohibited in Town vehicles and equipment with the following exceptions:

- Customers of transit services.
- ~~Apprehended persons for Police purposes.~~
- Police ride-along passengers that have executed a waiver of liability.
- Non-Town employee passengers associated with Town business or services provided by the Police Department.~~Victims of crime for Teton County Victim Services purposes.~~
- Elected or appointed Town board members with pre-approval.
- Passengers traveling with an employee, elected official, or appointed board member to, from, or during a conference or meeting.

Rented Vehicles

Additional insurance shall be obtained when vehicles are rented for Town purposes.

Pool Vehicles

The Town Manager approves employees/positions authorized regular or temporary use of pool vehicles. Employees may occasionally be asked to take a Town vehicle home for the purpose of plowing or sweeping parking lots.

Commuting

The Town Manager approves employees/positions authorized for commuter use of a Town vehicle on a regular or temporary basis. Employees may not use a Town vehicle to commute to or through destinations outside of the State of Wyoming or Teton County without specific authorization from the Town Manager or their designee~~except for vehicles for sworn law enforcement personnel~~. Employees authorized for commuter use shall not use the Town vehicle for personal use other than incidental stops while commuting. The Town follows all Internal Revenue Service (IRS) laws regarding taxable benefits as they relate to commuter authorization.

The Town recognizes the value of marked and unmarked police vehicles and sworn law enforcement personnel able to respond to calls for service in Teton County and immediately upon reaching the border of Teton County Wyoming and therefore allows sworn law enforcement personnel to commute on a regular basis with a personally assigned vehicle (PAV). PAVs shall only be stored at the employee's primary place of residence unless special permission is granted by the Chief of Police or their designee. Sworn law enforcement personnel operating a PAV shall wear or carry their badge, identification, sidearm, handcuffs, soft body armor and marked attire and shall adhere to operational guidelines.

The Town recognizes the value of quick response times for core facility and critical infrastructure emergencies and therefore allows employees in specific positions authorized by the Town Manager or their designee to commute on a regular basis with a PAV. PAVs in this category shall only be stored at the employee's primary place of residence unless special permission is granted by the Town Manager or their designee.

Personal Vehicle Use for Town Purposes

Occasionally the Town may require an employee to utilize their personal vehicle for Town purposes and any use requires Department Director approval. Mileage reimbursement for pre-approved use of a personal vehicle for occasional use is at the rate established by the [United States General Services Administration US\(GSA\)](#) for the most current year utilizing the [USGSA Privately Owned Vehicle \(POV\)](#) mileage reimbursement rate.

Electric Bicycles

Using a Town electric bicycle for Town purposes supports the Town's sustainability efforts. The following information does not apply to use of Town ebikes specifically designed for and used by law enforcement personnel. Employees, elected officials, or appointed board members may operate a Town electric bicycle only after they have executed an Electric Bicycle Waiver and Release of Claims. Employees shall not use Town electric bicycles for personal use other than incidental stops while traveling to or from locations for Town purposes. Town electric bicycles shall not be used for commuting purposes. Additional use parameters:

- A bicycle helmet must be worn at all times.
- Phone or earphone use is prohibited.
- Use during storms, heavy rain, ~~lightening~~[lightning](#), high winds, snow, or icy conditions is prohibited.

Accidents and Collisions

Any vehicle or electric bicycle accident or collision involving damage to a Town vehicle or electric bicycle, other vehicle or bicycle, persons, or property shall be reported immediately to the employee's supervisor who shall make an assessment and determine appropriate timing and necessity to further report the accident/collision to their Department Director, the Finance Director or their designee, and/or to law enforcement.

Employees are subject to post-accident drug and alcohol testing as set forth in separate drug and alcohol policies.

Reso 26-15, Reso 25-05

621. Wash Bay

Employees are authorized to wash personal vehicles in the Town wash bay pursuant to established procedures when not working, when it is not in use for Town purposes, and after they have completed requisite training and signed a waiver of liability. No one other than those listed below may drive a vehicle into or out of the wash bay, operate the wash bay equipment, or be present in the wash bay at any time other than inside a vehicle being washed without express permission of the Town Manager or their designee and only after they have completed requisite training and signed a waiver of liability.

- Town employee or Town elected official.
- Town dependent 18 years of age or older or elected official dependent 18 years of age or older.
- Employees of the Teton County Sheriff's Office.
- Members of Fire/EMS or Teton County Search and Rescue.
- Employees of Teton County Attorney's office.

- Judges and full-time employees of local court offices.
- Drivers of non-Town owned vehicles maintained by the Town of Jackson.
- Drivers of Teton County government vehicles.

Access to the wash bay will be revoked for users leaving the wash bay dirty or damaging equipment.

Reso 26-15, Reso 25-05

623. Travel

Town related travel and estimated expenses require pre-approval. Cost effective travel arrangements are to be utilized for employees travelling for Town purposes. Carpooling is expected when multiple employees are traveling to the same destination. Employees driving out of Town for Town purposes shall utilize a Town vehicle unless approval has been given by their Department Director or the Town Manager to utilize a ~~privately owned vehicle (POV)~~. If a POV has been authorized, mileage reimbursement shall be provided at the ~~USGSA~~ POV mileage reimbursement rate. Personal side trips while travelling on Town business ~~are not included in the POV~~require mileage reimbursement, or require reimbursement to the Town by the employee if over 20 miles total. Mileage reimbursement for approved use of a personal vehicle while traveling will be at the rate established by the USGSA for the most current year.

Within 15 days of return from travel, employees, elected officials, and appointed board members shall complete a travel reconciliation form and attach receipts for all non-meal items ~~if reimbursement is required for travel expenses incurred~~. No receipts are required for meals and incidentals as the Town will only provide the per diem rates or a fixed reimbursement amount if travel is longer than 2 weeks and the type of lodging includes facilities for cooking. Meals and Incidentals (M&IE) rates from the ~~USGSA~~ are utilized to pay employees for meals and incidentals after travel has concluded. Any meals provided as part of the conference or travel are deducted from the payment utilizing the separate amounts for breakfast, lunch, dinner, and incidentals.

Reso 26-15, Reso 25-05

625. Pets and Animals

Except for reasonable accommodations for service or emotional support animals required to comply with the Americans with Disabilities Act, in order to respect employees and members of the public that may have animal allergies, pets ~~and personal animals~~ are prohibited in Town facilities, ~~and~~ vehicles (including equipment), ~~and equipment~~ with the exception of housing units where pets are allowed, ~~Police service animals, personal~~ horses for mounted patrol (in Town owned trailer), case-by-case permission granted by a Department Director and approved by the Town Manager or their designee, or very occasionally on a single day occurrence when an employee may have an ~~vet~~ appointment for their pet, an emergency situation at home, or similar type of unplanned situation. Permission for case-by-case situations and occasional single-day occurrences may be rescinded by the Town Manager to protect the health, safety, and welfare of employees and members of the public, for consistency in policy application, and to maintain professionalism in offices frequented by members of the public. If approval is granted for an employee to have a pet with them during work, the employee is strictly liable for any damage or injury

to persons or property, regardless of whether it involves Town employees or property, or other persons or property.

Reso 26-15, Reso 25-05

626. Procurement and Town Credit Cards

Employees shall comply with procurement guidelines established by the Town Manager or their designee. These guidelines are designed to set expectations for employees and to ensure transparency, accountability, and compliance with applicable laws and regulations.

Town credit cards shall be used only after approval by the employee's Department Director.

Reso 26-15, Reso 25-05

627. Reporting of Critical, Emergency, Provocative Incidents and Subpoenas, Civil Suits or Criminal Charges

A critical, emergency, or provocative incident is defined as:

- a potential community or organizational controversy,
- an issue that may damage trust or respect the organization or a department has built, or
- an issue that might upset, surprise or embarrass the Town Council, a department, or the organization.

Employees are required to report incidents of a critical, emergency, or provocative nature to their Department Director at the earliest possible opportunity. Directors are required to report incidents to the Town Manager and the Director of External Affairs at the earliest opportunity.

Employees must immediately report to their Department Director the personal service of a subpoena, involvement in a civil suit, or personal criminal charges when such may affect their attendance, ability to perform their job, employment, or the reputation of the Town organization. Police Department employees must immediately report these occurrences to the Chief of Police or their designee regardless of potential impacts on attendance, job performance, employment, or reputation of the Town.

Reso 26-15, Reso 25-05

710. Use of ~~Generative~~ Artificial Intelligence (AI)

1. Purpose. This policy is intended to provide practical guidance for the responsible use of artificial intelligence (AI) by employees in a manner that supports innovation, improves efficiency, protects confidential information, preserves public trust, and promotes compliance with legal, records, privacy, security, and procurement requirements. Employees may not input Restricted Town Data (as defined in this section) into publicly accessible or non-approved artificial intelligence platforms or tools. AI is a tool to support, not replace, the work of Town employees.
2. Scope. This section applies to the use of artificial intelligence in Town operations, including administrative work, internal research, drafting, summarization, translation, transcription, coding

assistance, data analysis, predictive tools, public communications, constituent services, legislative support, and other official Town activities in which an artificial intelligence system is used to generate content, analyze information, make recommendations, or assist with work.

This section applies whether the artificial intelligence capability is embedded in a larger software platform, accessed through a standalone tool, provided by a vendor, or used through a personal account or personally owned device for Town-related work.

3. Definitions. For purposes of this section, the following definitions apply.

Artificial Intelligence (AI). This is a class of computer software, tools, services, and systems or functionality within systems, that use large language models, algorithms, deep-learning, and machine learning models, and can generate new content, including but not limited to text, images, video, and audio, based on patterns and structures of input data. These also include systems capable of ingesting input and translating that input into another form, such as text-to-code systems, and predictive model AI platforms and tools.

Human in the Loop (HITL). This is meaningful human review, judgment, and accountability over AI-assisted work before reliance, publication, communication, or action by the Town. HITL requires a responsible person to evaluate the accuracy, appropriateness, legality, and context of the AI-assisted output.

Restricted Town Data. This is all non-public, confidential, privileged, protected, law-enforcement-sensitive, personnel, health, financial, security-sensitive, attorney-client, or otherwise restricted Town information or data.

4. Standards for Use.

- a. General Authorization and Responsibility. Employees may use AI tools for Town work in a manner consistent with this section, other applicable Town policies, supervisory direction, and applicable law. Use of AI does not transfer responsibility from the employee. An employee remains accountable for the content, decision, communication, or action that results from AI-assisted work. All AI-assisted outputs adopted by an employee are considered that employee's work product.
- b. HITL Requirement. All use of AI shall include HITL oversight. AI may assist in drafting, analysis, research, and other work activities, but it may not serve as the final decision-maker for matters that require human judgment, legal compliance, public accountability, or the exercise of official Town discretion.
- c. Standards for AI-Assisted Work. When using AI tools, employees shall (i) review outputs for accuracy, completeness, and appropriateness before use; (ii) apply independent judgment rather than relying solely on AI output by default, and (iii) ensure that the final work product reflects informed HITL review and approval. AI may be used to assist in drafting, redrafting, or revising staff reports, agenda materials, memoranda, draft ordinances, draft resolutions, public information materials, and similar work product,

provided that a responsible employee reviews the output and adopts the final content before it is presented, published, or relied upon.

d. Audio and Video Recording Tools. Employees shall not knowingly or intentionally conceal use of AI during interaction with colleagues or the public, whether in person, in writing, or through digital communications, including but not limited to use of tools that may be recording or employing video and/or audio technologies.

e. Data Protection and Security.

- General Rule. Employees shall not enter any Restricted Town Data into an AI tool not approved for such use. Questions about whether data meets any of the parameters of Restricted Town Data shall be directed to the Town Attorney or their designee.
- Approved Use of Restricted Town Data. Restricted Town Data may only be used in an AI tool that has been approved for that category of data and the use complies with applicable law, contract terms, retention requirements, security controls, and Town policy. The Director of I.T. or their designee must review and approve AI solutions and/or vendors for official Town use before such platforms and/or tools can be linked to any Town data sets and/or other Town technology platforms. Such approved AI products must support retrieval and export of all outputs, either via exposed functionality or through vendor contract assurances.

No employee shall use AI in a manner that circumvents security controls, records obligations, legal review requirements, access controls, or established approval channels.

5. Personal and Consumer Tools. Employees shall not use personal or consumer AI tools for Town work in a manner that exposes Restricted Town Data, creates unauthorized system integrations, or bypasses required approvals.

Limited use of personal or consumer AI tools for routine convenience functions, such as language assistance, accessibility support, drafting help, or similar routine support, may be permitted when no Restricted Town Data is disclosed and the use does not create records, security, or public trust concerns inconsistent with this section. Employees uncertain whether a particular use qualifies shall consult their supervisor before proceeding.

Nothing in this section authorizes the connection of personal AI tools to Town systems, Town accounts, Town datasets, or Town-controlled workflows without prior written approval from the Director of I.T. or their designee.

6. Records and Retention. All final outputs, official communications, decisions, analyses, reports, or other records that are required to be retained remain subject to applicable public records and records retention requirements regardless of whether AI assisted in their creation.

7. Administration. The Town may issue procedures, guidance, training requirements, approval workflows, security standards, approved-tool lists, or departmental rules to implement this section.

Departments may impose stricter requirements for particular departments, data types, workflows, or risk categories where warranted.

~~Employees must observe the following requirements when acquiring and using software that meets the definition of Generative AI.~~

~~Generative AI is a class of computer software and systems, or functionality within systems, that use large language models, algorithms, deep learning, and machine learning models, and can generate new content, including but not limited to text, images, video, and audio, based on patterns and structures of input data. These also include systems capable of ingesting input and translating that input into another form, such as text-to-code systems. These requirements apply only to Generative AI systems.~~

- ~~1. Outputs of Generative AI systems must be reviewed by humans prior to each use in an official Town capacity ("Human in the Loop" or HITL). HITL review processes shall be documented by owning departments and shall demonstrate how the HITL review was conducted.~~
- ~~2. Documentation of HITL reviews shall be retained according to the appropriate records retention schedule.~~
- ~~3. Whenever possible, employees who use Generative AI tools are required to maintain, or be able to retrieve upon request, records of inputs, prompts, and outputs.~~
- ~~4. All images and videos created by Generative AI systems must be attributed to the appropriate Generative AI system. Wherever possible, attributions and citations to the Town should be embedded in the image or video (e.g., via digital watermark).~~
- ~~5. If text generated by an AI system is used substantively in a final product, attribution to the relevant AI system is required.~~
- ~~6. All attributions should include the name of the AI system used plus an HITL assertion (which should include the department or group who reviewed/edited the content).~~

~~*Example: Some material in this brochure was generated using ChatGPT 4.0 and was reviewed for accuracy by a member of the [] Department before publication.*~~
- ~~7. Employees shall not knowingly or intentionally conceal use of Generative AI during interaction with colleagues or the public, such as tools that may be listening and transcribing the conversation or tools that provide simultaneous translation.~~
- ~~8. Generative AI applications are built using training datasets from various sources on the internet and often include gender, racial, political, and other biases. As a result, Generative AI outputs can propagate biases. Additionally, even the most advanced current Generative AI tools may provide inconsistent answers to fact-based questions. All material generated by an AI system shall be checked for accuracy, as well as for biases they may display.~~
- ~~9. Employees shall not submit data that cannot be fully released to the public, or that is confidential, or that is privileged to Generative AI systems. Any questions about whether data is confidential or privileged shall be directed to the Town Attorney or their designee.~~
- ~~10. To the extent possible, no Town data or records, including inputs or prompts, are to be used for training or parameter tuning for Generative AI models outside the Town's control. AI technologies that cannot prevent Town data or records from contributing to their language models may not be used by Town employees.~~
- ~~11. All records generated, used, or stored by Generative AI vendors or solutions may be considered public records and must be disclosed or protected in accordance with the law.~~
- ~~12. Whenever possible, all Generative AI solutions and/or vendors approved for Town use shall be~~

~~required to support retrieval and export of all prompts and outputs (either via exposed functionality or through vendor contract assurances).~~

Reso 26-15, Reso 25-05

803. Training Reimbursement

Because of the expense incurred by the Town associated with recruitment, hiring, and training employees in certain positions, employees who separate employment prior to satisfying any agreed upon training reimbursement requirement are required to reimburse the Town either prior to departure or pursuant to repayment terms issued by the Town. Specific details of the reimbursement requirement are approved by the Town Manager or their designee and are provided to employees in their offer of employment and in a separate training reimbursement agreement provided at the time employment commences.

Police Officers

Police Officers hired without Police Officer Standards and Training (POST) certification ~~or~~ and successful completion of a recognized field training program are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they leave employment prior to 2 years of sworn law enforcement service in the Jackson Police Department after completion of POST certification and from the Wyoming Police Academy and completion of the Town of Jackson's field training program.

Public Works Operators

Public Works Operators hired without a Commercial Driver's License (CDL), that have the costs associated with obtaining that CDL paid by the Town of Jackson, are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they fail to obtain their CDL in the time frame set forth in their offer of employment or if they leave employment prior to 2 years of service to the Town of Jackson as licensed Operator.

Specialized Training

Because of expenses that may be incurred related to specialized training after employment has commenced, employees may be provided a specialized training reimbursement agreement at the time of that specialized training. Employees who separate employment prior to satisfying any agreed upon specialized training reimbursement requirement are required to reimburse the Town pursuant to their agreement either prior to departure or pursuant to repayment terms issued by the Town.

Reso 26-15, Reso 25-05

ACKNOWLEDGEMENT OF RECEIPT

I HAVE RECEIVED A COPY OF THE AMENDED EMPLOYEE POLICY MANUAL FOR GENERAL EMPLOYEES LAST AMENDED ON AUGUST 3RD DATED MARCH 17, 2025~~56~~. I UNDERSTAND THAT I AM TO BECOME FAMILIAR WITH ITS CONTENTS. FURTHER, I UNDERSTAND:

EMPLOYMENT WITH THE TOWN IS AT-WILL. I HAVE THE RIGHT TO END MY WORK RELATIONSHIP WITH THE TOWN, WITH OR WITHOUT ADVANCE NOTICE FOR ANY REASON. THE TOWN HAS THE SAME RIGHT.

THE LANGUAGE USED IN THIS POLICY MANUAL AND ANY VERBAL STATEMENTS OF MANAGEMENT ARE NOT INTENDED TO CONSTITUTE A CONTRACT OF EMPLOYMENT, EITHER EXPRESS OR IMPLIED, NOR ARE THEY A GUARANTEE OF EMPLOYMENT FOR A SPECIFIC DURATION.

THE POLICY MANUAL IS NOT ALL INCLUSIVE BUT IS INTENDED TO PROVIDE ME WITH A SUMMARY OF SOME OF THE TOWN'S GUIDELINES.

THIS EDITION REPLACES ALL PREVIOUSLY ISSUED POLICY MANUALS. THE NEED MAY ARISE TO CHANGE THE GUIDELINES DESCRIBED IN THE POLICY MANUAL, EXCEPT FOR THE AT-WILL NATURE OF EMPLOYMENT. THE TOWN, THEREFORE, RESERVES THE RIGHT TO INTERPRET THEM OR TO CHANGE THEM WITHOUT PRIOR NOTICE.

NO REPRESENTATIVE OF THE TOWN, OTHER THAN THE MAYOR AND COUNCIL HAVE AUTHORITY TO ENTER INTO AN AGREEMENT OF EMPLOYMENT WITH ANY EMPLOYEE OTHER THAN THE TOWN MANAGER, THE TOWN ATTORNEY, OR THE MUNICIPAL JUDGE FOR ANY SPECIFIED PERIOD, AND SUCH AGREEMENT MUST BE IN WRITING, SIGNED BY THE MAYOR AND THE EMPLOYEE. WE HAVE NOT ENTERED INTO SUCH AN AGREEMENT.

Signature

Employee Name

Date

Reso 26-15, Reso 25-05

RESOLUTION 26-15

A RESOLUTION ADOPTING AMENDMENTS TO THE POLICY MANUAL FOR GENERAL EMPLOYEES

EFFECTIVE August 3, 2026

WHEREAS, pursuant to Wyo. Stat. §15-3-204(b), the governing body by resolution may specify conditions for specific employee offices or positions within the Town organization; and

WHEREAS, these specific employee offices and positions conform to the same conditions as other employees in the Town organization; and

WHEREAS, adoption of policy manuals for Town employees by resolution establishes a clear way to track employee policies that protect and affect Town employees; and

WHEREAS, the Policy Manual for General Employees was adopted as Appendix A to Resolution 25-05 on March 17, 2025; and

WHEREAS, amendments to the Policy Manual for General Employees are recommended; and

WHEREAS, the Town Council, by adoption of this resolution, adopts amendments to specific sections of the Policy Manual for General Employees, attached hereto as Appendix A, which shall be incorporated into the Policy Manual for General Employees; and

WHEREAS, all previously adopted sections of the Policy Manual for General Employees shall remain unchanged with the exception of the Table of Contents, the resolution update history for each section, and the page numbering.

NOW THEREFORE BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF JACKSON, WYOMING, having fully considered the matter at hand,

The Jackson Town Council adopts this Resolution 26-15, adopting amendments to specific sections of the Policy Manual for General Employees attached hereto as Appendix A.

PASSED, APPROVED, AND ADOPTED this 3rd day of August, 2026.

TOWN OF JACKSON

Arne Jorgensen, Mayor

ATTEST: _____
Marisa N. Watsabaugh, Town Clerk

EXHIBIT A

AMENDMENTS TO THE POLICY MANUAL FOR GENERAL EMPLOYEES

Unless shown below, all previously adopted sections of the Policy Manual for General Employees shall remain unchanged with the exception of the Table of Contents, the resolution update history for each section, and the page numbering.

402. Paid Leave Table

Paid Leave Table	
Paid Time Off (PTO) for Positions with Holiday, Vacation, & Sick Combined	Hours
First Year	240
1 Year Completed	240
2 Years Completed	240
3 Years Completed	240
4 Years Completed	240
5 Years Completed	296
6 Years Completed	306
7 Years Completed	306
8 Years Completed	306
9 Years Completed	306
10 Years Completed	316
11 Years Completed	316
12 Years Completed	316
13 Years Completed	316
14 Years Completed	316
15+ Years Completed	336
Paid Time Off (PTO) for Positions with Vacation & Sick Combined + Separate Holiday Stipend	Hours
First Year	152
1 Year Completed	152
2 Years Completed	152
3 Years Completed	152
4 Years Completed	152
5 Years Completed	208
6 Years Completed	218
7 Years Completed	218
8 Years Completed	218
9 Years Completed	218
10 Years Completed	228
11 Years Completed	228
12 Years Completed	228
13 Years Completed	228
14 Years Completed	228
15+ Years Completed	248
Other	Hours or Days
PTO Use Required for Dependent Leave or Sustainment Leave Eligibility	24 hours
PTO Buyout Maximum	40 hours
PTO Paid for Cancellation of Pre Approved PTO	40 hours
Dependent Leave	80 hours
Funeral Leave Regular/Extensive Travel/Death of a Child 21 or Under	24/40/80 hours
Work-Related Injury Leave Prior to Worker's Comp If Total Work-Related Injury Leave is 8 Days or Less	3 days
Emergency Service Leave	250 hours
Reserve and Guard Duty Leave	250 hours

403. Paid Time Off (PTO)

The Town of Jackson combines holidays, vacation, and sick leave into Paid Time Off (PTO) for full-time and part-time employees, except for full-time transit operators and transit system supervisor/dispatchers. Full-time transit operators and transit system supervisor/dispatchers receive combined vacation and sick leave into PTO as noted in the paid leave table and are provided an 8 hour holiday stipend at their regular rate of pay for each holiday as it occurs regardless of time worked during that week or on that holiday. All paid leave, whether PTO or other, is provided at the employee's base rate of pay.

PTO provision, expiration, and scheduling. PTO is provided on the employee's hire date and each year thereafter on their hire date anniversary. References to 'year' in the employee benefits section, unless specified, refers to the year between hire date anniversaries. PTO expires the day prior to the employee's hire date anniversary. Part-time employees are currently eligible for PTO benefits proportional to the number of budget authorized hours.

PTO is granted in a manner that minimizes interruptions to the operations of the Town. PTO days are to be planned and scheduled in advance whenever possible. Employees showing up for work are required to be physically and mentally able to work and are required to notify their supervisor if they are not physically or mentally able to perform their full duties. Employees that come to work obviously ill or injured or their obvious illness or injury may lead to others getting ill or injured, may be sent home at the discretion of their Department Director and required to utilize PTO. In the event the employee is absent for 4 or more workdays due to an illness or injury, medical certification may be required. The Town reserves the right to send an employee to a doctor of the Town's choosing at the Town's expense. The Town does not retaliate against an employee for utilizing unplanned PTO for an injury or illness.

PTO approval and use. Employees are encouraged to meet with their supervisor on their hire date anniversary to discuss and receive approval for planned PTO throughout the coming year. Use of PTO for full or partial days requires Department Director pre-approval except in the instance of utilizing PTO for unplanned instances. Employees must notify their supervisor each day at the beginning of their shift when they cannot come to work because of unplanned PTO use including illness, injury, birth of their child, medical care or other similar unplanned situation. Employees utilizing unplanned PTO shall inform their supervisor when they expect to return to work. PTO use during an employee's last 80 hours of work requires approval from the Director of Internal Services and the Town Manager.

The Town Manager may send staff home on a temporary basis for operational reasons and require staff to utilize PTO.

Net Leave. Full-time non-exempt employees that do not work 40 hours in a week (or 80 hours in a 2-week period for 7k exemption employees) are required to utilize PTO hours necessary to bring their hours to 40 (or 80 for 7k exemption employees). Part time non-exempt employees that do not work their regular schedule of hours in a week are required to utilize PTO hours necessary to bring their hours to their regular schedule of hours. Employees are only paid PTO hours necessary to bring their paid hours to their full schedule unless the employee indicates 'No Net Leave' on their time sheet during a 40/80

hour pay period where they intended to take PTO and ended up working extra hours on other days in that period. In that instance, a non-exempt employee will be paid for a full scheduled day of PTO time in addition to their hours worked during that period.

PTO buyback. The Town pays employees their unused PTO existing the day prior to their hire date anniversary up to the maximum noted in the paid leave table, unless they have used a portion of hours of other paid leave during the year, except for emergency service leave or reserve and guard duty. The Town pays employees up to the maximum hours of PTO noted in the paid leave table, if their pre-approved PTO was cancelled by the Town Manager due to operational needs. There is no PTO payout upon separation of employment.

Additional provisions. Upon the death of a Town employee, the Town pays a maximum of 40 hours of any remaining PTO.

Employees on a period of approved, planned PTO are not authorized to work during that period without specific director pre-approval, and for directors, without Town Manager pre-approval. The exception to this rule is if there is an emergency situation.

Reso 26-15, Reso 25-05

407. Funeral Leave

Department Directors are authorized to grant funeral leave as described. In the event of a death in their immediate family, full- and part-time employees are granted paid funeral leave noted in the paid leave table to attend a funeral or memorial service. If extensive travel is required or in the event of the death of a child 21 or younger, additional hours are granted as noted in the paid leave table. For the purposes of this supplemental leave, immediate family is defined as spouse, siblings, parents, children, grandparents, grandchildren, mother and father in-law, and eligible partners as defined in an Affidavit of Domestic Partnership for health care coverage. In the event of the death of a near relative, full and part-time employees are granted up to one paid day to attend a funeral. Near relatives include the employee's aunts, uncles, nieces, nephews, and their spouse's or partner's grandparents, brothers, sisters, and other close relatives. For funerals of friends, employees may take PTO or unpaid leave with approval of their Department Director.

Reso 26-15, Reso 25-05

409. Work-Related Injury Leave

For work related injuries where a doctor's note is provided and the employee has completed requisite worker's comp documentation, full and part-time employees are provided paid work-related injury leave. Employees may decline work-related injury leave retroactively 30 days prior to the end of the year, and in that instance, PTO will be deducted for that period of leave instead of work-related injury leave. Employees utilizing work-related injury leave must present a medical provider's statement indicating ability to return to work.

Reso 26-15, Reso 25-05

416. Administrative Leave/Suspension

Paid Administrative Leave/Paid Suspension. Employees may be placed on immediate paid administrative leave/paid suspension by their supervisor or Department Director. The duration of the paid administrative leave/paid suspension requires approval by the Director of Internal Services. Employees may be denied access to Town facilities and networks for the duration of their paid administrative leave/paid suspension.

Unpaid Administrative Leave/Unpaid Suspension. Unpaid administrative leave or unpaid suspension is a separate type of leave and is considered a disciplinary action.

Reso 26-15, Reso 25-05

505. Call-In Pay

Non-exempt employees may be called in from standby to perform work. Two hours of call-in, at the premium rate of one and one-half times the employee's base rate, is paid regardless of whether the work exceeds 40/80 hours. Any work performed in excess of 2 hours is paid at the premium rate of one and one-half times the employee's base rate regardless of whether the work is in excess of 40/80 hours. Failure to respond to a call or message during the employee's designated standby time may result in discipline.

Reso 26-15, Reso 25-05

512. Shift Differentials and Special Rates of Pay

To address specific purposes or provide incentives, the Town provides the following types of hourly shift differentials and special rates of pay to eligible employees in amounts approved by the Town Manager.

Police Officers – Driving Under the Influence (DUI), Enforcing Underage Drinking Laws (EUDL), and Highly Visible Enforcement (HVE)

Law enforcement work related to alcohol compliance and violations is of particular importance to the Wyoming Department of Transportation and the Wyoming Association of Sheriffs and Chiefs of Police and they are therefore incentivizing local governments to perform extra work in these areas by providing grant funds. Police Officers are provided a special rate of pay for work performed under this grant when marked on their time sheet as such.

Police Officers – Airport Duty

Airport duty is specialized work for Police Officers that requires a sworn officer be present but that is at a very different pace than regular law enforcement work in the Town of Jackson. Police Officers are provided a shift differential for work performed at the Jackson Hole Airport.

Police Officers – Performing Field Training Officer (FTO) Duties

FTO duties are critically important for training new officers and are usually performed by sworn officers with a rank of Corporal or above. Police Officers are provided a special rate of pay for work performed as an FTO.

Transit Operators – Commuter Route Driving

Operation of a START Bus through the Snake River Canyon and over Teton Pass, in heavy traffic and frequently in poor driving conditions can be hazardous and treacherous. Transit Operators are provided a shift differential for routes driven through the Snake River Canyon and over Teton Pass.

Transit Operators – Training Other Operators

Training Transit Operators while serving in a non-supervisory role is a higher level of responsibility. Transit Operators are provided a shift differential for work performed while training other Transit Operators.

Public Works Operators - Snow Removal Operations

Snow removal operations occur in the dark, during the winter, and frequently in challenging weather conditions. Public Works personnel performing snow removal operations, during shifts starting at 2:30AM or earlier on specific dates between November 1 and April 15 approved by the Public Works Director or their designee, are provided a shift differential.

Public Works Operators - Street Sweeping Operations

Street sweeping operations are conducted early, often in the dark, and require attention to detail with vehicles parked on the street. Public Works personnel performing street sweeping operations during shifts starting at 2:30AM or earlier are provided a shift differential.

Reso 26-15, Reso 25-05

612. Employee Ethics and Conflicts of Interest

Employees are held to a high ethical standard and expected to act accordingly. Employees shall comply with the Jackson Municipal Code as it relates to conflicts of interest. Employees can obtain a copy of excerpts from the Municipal Code regarding conflicts of interest on the Town's intranet, the internet, or from the Internal Services Department.

If employees have any questions about whether a situation is an ethical concern or a conflict of interest, they should refer the matter to the Director of Internal Services and/or the Town Attorney for final determination.

Reso 26-15, Reso 25-05

616. References

The Town does not furnish open letters of recommendation addressed "To Whom It May Concern."

If an employee receives an inquiry or reference request regarding a former or current employee, they are asked to refer that request to Internal Services. Only the Director of Internal Services or their designee has the authority to respond to such inquiries. This includes all types of references including, but not limited to verbal, written, electronic and social media.

Reso 26-15, Reso 25-05

619. Use of Town Property

Town property shall be used and cared for responsibly. Use of Town property is limited to Town purposes except for the following instances expressly permitted in this Policy Manual and limited to Town employees unless expressly authorized:

- Town mechanics utilizing the fleet maintenance work bays and limited tools and equipment of the Town to work on personal vehicles while not working.
- Use of printers/copiers for personal printing/copying/faxing so long as fees are paid for copies or printing with the exception of the first 5 pages.
- Vehicles as outlined in Section 620.
- Wash bay use as outlined in Section 621.
- Basement exercise facility use as outlined in Section 622.
- Use of Town phones, computers and equipment as outlined in Section 7 Communications.
- Use of common supplies for personal reasons including Kleenex, toilet paper, and other similar items.

Reso 26-15, Reso 25-05

620. Vehicles, Electric Bicycles, and Accidents/Collisions

Town vehicles shall only be used for Town purposes except for:

- incidental stops while traveling to and from official Town business,
- incidental travel (approximately 20 miles or less in total) for personal reasons that deviates from travel for Town purposes while traveling outside the community for Town business,
- authorized commuting,
- travel to and from the gym to work out (sworn law enforcement personnel residing in Teton County only).

Town vehicles include cars, trucks, equipment, and motorcycles. No person other than a Town employee, elected official, or appointed board member may operate a Town vehicle or electric bicycle. Federal, state, and local laws shall be followed at all times for vehicle and bicycle use and safe, prudent, and courteous behaviors are expected. Unnecessary idling shall be avoided. Failure to provide immediate notification to the employee's Department Director and the Director of Internal Services when there is a change in driver's license validity, class or endorsements is prohibited.

Non-Town Employee Passengers

Non-Town employee passengers are prohibited on electric bicycles. Non-Town employee passengers are prohibited in Town vehicles and equipment with the following exceptions:

- Customers of transit services.
- Police ride-along passengers that have executed a waiver of liability.
- Non-Town employee passengers associated with Town business or services provided by the Police Department.
- Elected or appointed Town board members with pre-approval.

- Passengers traveling with an employee, elected official, or appointed board member to, from, or during a conference or meeting.

Rented Vehicles

Additional insurance shall be obtained when vehicles are rented for Town purposes.

Pool Vehicles

The Town Manager approves employees/positions authorized regular or temporary use of pool vehicles. Employees may occasionally be asked to take a Town vehicle home for the purpose of plowing or sweeping parking lots.

Commuting

The Town Manager approves employees/positions authorized for commuter use of a Town vehicle on a regular or temporary basis. Employees may not use a Town vehicle to commute to or through destinations outside of the State of Wyoming or Teton County without specific authorization from the Town Manager or their designee. Employees authorized for commuter use shall not use the Town vehicle for personal use other than incidental stops while commuting. The Town follows all Internal Revenue Service (IRS) laws regarding taxable benefits as they relate to commuter authorization.

The Town recognizes the value of marked and unmarked police vehicles and sworn law enforcement personnel able to respond to calls for service in Teton County and immediately upon reaching the border of Teton County Wyoming and therefore allows sworn law enforcement personnel to commute on a regular basis with a personally assigned vehicle (PAV). PAVs shall only be stored at the employee's primary place of residence unless special permission is granted by the Chief of Police or their designee. Sworn law enforcement personnel operating a PAV shall wear or carry their badge, identification, sidearm, handcuffs, soft body armor and marked attire and shall adhere to operational guidelines.

The Town recognizes the value of quick response times for core facility and critical infrastructure emergencies and therefore allows employees in specific positions authorized by the Town Manager or their designee to commute on a regular basis with a PAV. PAVs in this category shall only be stored at the employee's primary place of residence unless special permission is granted by the Town Manager or their designee.

Personal Vehicle Use for Town Purposes

Occasionally the Town may require an employee to utilize their personal vehicle for Town purposes and any use requires Department Director approval. Mileage reimbursement for pre-approved use of a personal vehicle for occasional use is at the rate established by the United States General Services Administration (GSA) for the most current year utilizing the GSA Privately Owned Vehicle (POV) mileage reimbursement rate.

Electric Bicycles

Using a Town electric bicycle for Town purposes supports the Town's sustainability efforts. The following information does not apply to use of Town ebikes specifically designed for and used by law enforcement personnel. Employees, elected officials, or appointed board members may operate a Town electric bicycle only after they have executed an Electric Bicycle Waiver and Release of Claims. Employees shall

not use Town electric bicycles for personal use other than incidental stops while traveling to or from locations for Town purposes. Town electric bicycles shall not be used for commuting purposes. Additional use parameters:

- A bicycle helmet must be worn at all times.
- Phone or earphone use is prohibited.
- Use during storms, heavy rain, lightning, high winds, snow, or icy conditions is prohibited.

Accidents and Collisions

Any vehicle or electric bicycle accident or collision involving damage to a Town vehicle or electric bicycle, other vehicle or bicycle, persons, or property shall be reported immediately to the employee's supervisor who shall make an assessment and determine appropriate timing and necessity to further report the accident/collision to their Department Director, the Finance Director or their designee, and/or to law enforcement.

Employees are subject to post-accident drug and alcohol testing as set forth in separate drug and alcohol policies.

Reso 26-15, Reso 25-05

621. Wash Bay

Employees are authorized to wash personal vehicles in the Town wash bay pursuant to established procedures when not working, when it is not in use for Town purposes, and after they have completed requisite training and signed a waiver of liability. No one other than those listed below may drive a vehicle into or out of the wash bay, operate the wash bay equipment, or be present in the wash bay at any time other than inside a vehicle being washed without express permission of the Town Manager or their designee and only after they have completed requisite training and signed a waiver of liability.

- Town employee or Town elected official.
- Town dependent 18 years of age or older or elected official dependent 18 years of age or older.
- Employees of the Teton County Sheriff's Office.
- Members of Fire/EMS or Teton County Search and Rescue.
- Employees of Teton County Attorney's office.
- Judges and full-time employees of local court offices.
- Drivers of non-Town owned vehicles maintained by the Town of Jackson.
- Drivers of Teton County government vehicles.

Access to the wash bay will be revoked for users leaving the wash bay dirty or damaging equipment.

Reso 26-15, Reso 25-05

623. Travel

Town related travel and estimated expenses require pre-approval. Cost effective travel arrangements are to be utilized for employees travelling for Town purposes. Carpooling is expected when multiple

employees are traveling to the same destination. Employees driving out of Town for Town purposes shall utilize a Town vehicle unless approval has been given by their Department Director or the Town Manager to utilize a POV. If a POV has been authorized, mileage reimbursement shall be provided at the GSA POV mileage reimbursement rate. Personal side trips while travelling on Town business are not included in the POV mileage reimbursement, or require reimbursement to the Town by the employee if over 20 miles total. Mileage reimbursement for approved use of a personal vehicle while traveling will be at the rate established by the USGSA for the most current year.

Within 15 days of return from travel, employees, elected officials, and appointed board members shall complete a travel reconciliation form and attach receipts for all non-meal items. No receipts are required for meals and incidentals as the Town will only provide the per diem rates or a fixed reimbursement amount if travel is longer than 2 weeks and the type of lodging includes facilities for cooking. Meals and Incidentals (M&IE) rates from the GSA are utilized to pay employees for meals and incidentals after travel has concluded. Any meals provided as part of the conference or travel are deducted from the payment utilizing the separate amounts for breakfast, lunch, dinner, and incidentals.

Reso 26-15, Reso 25-05

625. Pets and Animals

Except for reasonable accommodations for service or emotional support animals required to comply with the Americans with Disabilities Act, in order to respect employees and members of the public that may have animal allergies, pets are prohibited in Town facilities and vehicles (including equipment), with the exception of housing units where pets are allowed, personal horses for mounted patrol (in Town owned trailer), case-by-case permission granted by a Department Director and approved by the Town Manager or their designee, or very occasionally on a single day occurrence when an employee may have an appointment for their pet, an emergency situation at home, or similar type of unplanned situation. Permission for case-by-case situations and occasional single-day occurrences may be rescinded by the Town Manager to protect the health, safety, and welfare of employees and members of the public, for consistency in policy application, and to maintain professionalism in offices frequented by members of the public. If approval is granted for an employee to have a pet with them during work, the employee is strictly liable for any damage or injury to persons or property, regardless of whether it involves Town employees or property, or other persons or property.

Reso 26-15, Reso 25-05

626. Procurement and Town Credit Cards

Employees shall comply with procurement guidelines established by the Town Manager or their designee. These guidelines are designed to set expectations for employees and to ensure transparency, accountability, and compliance with applicable laws and regulations.

Town credit cards shall be used only after approval by the employee's Department Director.

Reso 26-15, Reso 25-05

627. Reporting of Critical, Emergency, Provocative Incidents and Subpoenas, Civil Suits or Criminal Charges

A critical, emergency, or provocative incident is defined as:

- a potential community or organizational controversy,
- an issue that may damage trust or respect the organization or a department has built, or
- an issue that might upset, surprise or embarrass the Town Council, a department, or the organization.

Employees are required to report incidents of a critical, emergency, or provocative nature to their Department Director at the earliest possible opportunity. Directors are required to report incidents to the Town Manager and the Director of External Affairs at the earliest opportunity.

Employees must immediately report to their Department Director the personal service of a subpoena, involvement in a civil suit, or personal criminal charges when such may affect their attendance, ability to perform their job, employment, or the reputation of the Town organization. Police Department employees must immediately report these occurrences to the Chief of Police or their designee regardless of potential impacts on attendance, job performance, employment, or reputation of the Town.

Reso 26-15, Reso 25-05

710. Use of Artificial Intelligence (AI)

1. Purpose. This policy is intended to provide practical guidance for the responsible use of artificial intelligence (AI) by employees in a manner that supports innovation, improves efficiency, protects confidential information, preserves public trust, and promotes compliance with legal, records, privacy, security, and procurement requirements. *Employees may not input Restricted Town Data (as defined in this section) into publicly accessible or non-approved artificial intelligence platforms or tools. AI is a tool to support, not replace, the work of Town employees.*
2. Scope. This section applies to the use of artificial intelligence in Town operations, including administrative work, internal research, drafting, summarization, translation, transcription, coding assistance, data analysis, predictive tools, public communications, constituent services, legislative support, and other official Town activities in which an artificial intelligence system is used to generate content, analyze information, make recommendations, or assist with work.

This section applies whether the artificial intelligence capability is embedded in a larger software platform, accessed through a standalone tool, provided by a vendor, or used through a personal account or personally owned device for Town-related work.

3. Definitions. For purposes of this section, the following definitions apply.

Artificial Intelligence (AI). This is a class of computer software, tools, services, and systems or functionality within systems, that use large language models, algorithms, deep-learning, and machine learning models, and can generate new content, including but not limited to text, images, video, and audio, based on patterns and structures of input data. These also include

systems capable of ingesting input and translating that input into another form, such as text-to-code systems, and predictive model AI platforms and tools.

Human in the Loop (HITL). This is meaningful human review, judgment, and accountability over AI-assisted work before reliance, publication, communication, or action by the Town. HITL requires a responsible person to evaluate the accuracy, appropriateness, legality, and context of the AI-assisted output.

Restricted Town Data. This is all non-public, confidential, privileged, protected, law-enforcement-sensitive, personnel, health, financial, security-sensitive, attorney-client, or otherwise restricted Town information or data.

4. Standards for Use.

- a. **General Authorization and Responsibility.** Employees may use AI tools for Town work in a manner consistent with this section, other applicable Town policies, supervisory direction, and applicable law. Use of AI does not transfer responsibility from the employee. An employee remains accountable for the content, decision, communication, or action that results from AI-assisted work. All AI-assisted outputs adopted by an employee are considered that employee's work product.
- b. **HITL Requirement.** All use of AI shall include HITL oversight. AI may assist in drafting, analysis, research, and other work activities, but it may not serve as the final decision-maker for matters that require human judgment, legal compliance, public accountability, or the exercise of official Town discretion.
- c. **Standards for AI-Assisted Work.** When using AI tools, employees shall (i) review outputs for accuracy, completeness, and appropriateness before use; (ii) apply independent judgment rather than relying solely on AI output by default, and (iii) ensure that the final work product reflects informed HITL review and approval. AI may be used to assist in drafting, redrafting, or revising staff reports, agenda materials, memoranda, draft ordinances, draft resolutions, public information materials, and similar work product, provided that a responsible employee reviews the output and adopts the final content before it is presented, published, or relied upon.
- d. **Audio and Video Recording Tools.** Employees shall not knowingly or intentionally conceal use of AI during interaction with colleagues or the public, whether in person, in writing, or through digital communications, including but not limited to use of tools that may be recording or employing video and/or audio technologies.
- e. **Data Protection and Security.**
 - General Rule. Employees shall not enter any Restricted Town Data into an AI tool not approved for such use. Questions about whether data meets any of the parameters of Restricted Town Data shall be directed to the Town Attorney or their designee.
 - Approved Use of Restricted Town Data. Restricted Town Data may only be used in an AI tool that has been approved for that category of data and the use complies with applicable law, contract terms, retention requirements, security controls, and Town policy. The Director of I.T. or their designee must review and approve AI solutions and/or vendors for official Town use before such platforms and/or tools can be linked to any Town data sets and/or other Town technology platforms. Such approved AI

products must support retrieval and export of all outputs, either via exposed functionality or through vendor contract assurances.

No employee shall use AI in a manner that circumvents security controls, records obligations, legal review requirements, access controls, or established approval channels.

5. **Personal and Consumer Tools.** Employees shall not use personal or consumer AI tools for Town work in a manner that exposes Restricted Town Data, creates unauthorized system integrations, or bypasses required approvals.

Limited use of personal or consumer AI tools for routine convenience functions, such as language assistance, accessibility support, drafting help, or similar routine support, may be permitted when no Restricted Town Data is disclosed and the use does not create records, security, or public trust concerns inconsistent with this section. Employees uncertain whether a particular use qualifies shall consult their supervisor before proceeding.

Nothing in this section authorizes the connection of personal AI tools to Town systems, Town accounts, Town datasets, or Town-controlled workflows without prior written approval from the Director of I.T. or their designee.

6. **Records and Retention.** All final outputs, official communications, decisions, analyses, reports, or other records that are required to be retained remain subject to applicable public records and records retention requirements regardless of whether AI assisted in their creation.
7. **Administration.** The Town may issue procedures, guidance, training requirements, approval workflows, security standards, approved-tool lists, or departmental rules to implement this section.

Departments may impose stricter requirements for particular departments, data types, workflows, or risk categories where warranted.

Reso 26-15, Reso 25-05

803. Training Reimbursement

Because of the expense incurred by the Town associated with recruitment, hiring, and training employees in certain positions, employees who separate employment prior to satisfying any agreed upon training reimbursement requirement are required to reimburse the Town either prior to departure or pursuant to repayment terms issued by the Town. Specific details of the reimbursement requirement are approved by the Town Manager or their designee and are provided to employees in their offer of employment and in a separate training reimbursement agreement provided at the time employment commences.

Police Officers

Police Officers hired without Police Officer Standards and Training (POST) certification and successful completion of a recognized field training program are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they leave employment prior to 2 years of sworn law enforcement service in the Jackson Police Department after completion of POST certification from the Wyoming Police Academy and completion of the Town of Jackson's field training program.

Public Works Operators

Public Works Operators hired without a Commercial Driver's License (CDL), that have the costs associated with obtaining that CDL paid by the Town of Jackson, are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they fail to obtain their CDL in the time frame set forth in their offer of employment or if they leave employment prior to 2 years of service to the Town of Jackson as licensed Operator.

Specialized Training

Because of expenses that may be incurred related to specialized training after employment has commenced, employees may be provided a specialized training reimbursement agreement at the time of that specialized training. Employees who separate employment prior to satisfying any agreed upon specialized training reimbursement requirement are required to reimburse the Town pursuant to their agreement either prior to departure or pursuant to repayment terms issued by the Town.

Reso 26-15, Reso 25-05

ACKNOWLEDGEMENT OF RECEIPT

I HAVE RECEIVED A COPY OF THE AMENDED EMPLOYEE POLICY MANUAL FOR GENERAL EMPLOYEES LAST AMENDED ON AUGUST 3, 2026. I UNDERSTAND THAT I AM TO BECOME FAMILIAR WITH ITS CONTENTS. FURTHER, I UNDERSTAND:

EMPLOYMENT WITH THE TOWN IS AT-WILL. I HAVE THE RIGHT TO END MY WORK RELATIONSHIP WITH THE TOWN, WITH OR WITHOUT ADVANCE NOTICE FOR ANY REASON. THE TOWN HAS THE SAME RIGHT.

THE LANGUAGE USED IN THIS POLICY MANUAL AND ANY VERBAL STATEMENTS OF MANAGEMENT ARE NOT INTENDED TO CONSTITUTE A CONTRACT OF EMPLOYMENT, EITHER EXPRESS OR IMPLIED, NOR ARE THEY A GUARANTEE OF EMPLOYMENT FOR A SPECIFIC DURATION.

THE POLICY MANUAL IS NOT ALL INCLUSIVE BUT IS INTENDED TO PROVIDE ME WITH A SUMMARY OF SOME OF THE TOWN'S GUIDELINES.

THIS EDITION REPLACES ALL PREVIOUSLY ISSUED POLICY MANUALS. THE NEED MAY ARISE TO CHANGE THE GUIDELINES DESCRIBED IN THE POLICY MANUAL, EXCEPT FOR THE AT-WILL NATURE OF EMPLOYMENT. THE TOWN, THEREFORE, RESERVES THE RIGHT TO INTERPRET THEM OR TO CHANGE THEM WITHOUT PRIOR NOTICE.

NO REPRESENTATIVE OF THE TOWN, OTHER THAN THE MAYOR AND COUNCIL HAVE AUTHORITY TO ENTER INTO AN AGREEMENT OF EMPLOYMENT WITH ANY EMPLOYEE OTHER THAN THE TOWN MANAGER, THE TOWN ATTORNEY, OR THE MUNICIPAL JUDGE FOR ANY SPECIFIED PERIOD, AND SUCH AGREEMENT MUST BE IN WRITING, SIGNED BY THE MAYOR AND THE EMPLOYEE. WE HAVE NOT ENTERED INTO SUCH AN AGREEMENT.

Signature

Employee Name

Date

RESOLUTION 26-16

**A RESOLUTION ADOPTING AMENDMENTS TO THE POLICY MANUAL FOR TRANSIT RELATED
EMPLOYEES**

EFFECTIVE August 3, 2026

WHEREAS, pursuant to Wyo. Stat. §15-3-204(b), the governing body by resolution may specify conditions for specific employee offices or positions within the Town organization; and

WHEREAS, these specific employee offices and positions conform to the same conditions as other employees in the Town organization; and

WHEREAS, adoption of policy manuals for Town employees by resolution establishes a clear way to track employee policies that protect and affect Town employees; and

WHEREAS, the Policy Manual for Transit Related Employees was adopted as Appendix A to Resolution 25-06 on March 17, 2025; and

WHEREAS, amendments to the Policy Manual for Transit Related Employees are recommended; and

WHEREAS, the Town Council, by adoption of this resolution, adopts amendments to specific sections of the Policy Manual for Transit Related Employees, attached hereto as Appendix A, which shall be incorporated into the Policy Manual for Transit Related Employees; and

WHEREAS, all previously adopted sections of the Policy Manual for Transit Related Employees shall remain unchanged with the exception of the Table of Contents, the resolution update history for each section, and the page numbering.

NOW THEREFORE BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF JACKSON, WYOMING, having fully considered the matter at hand,

The Jackson Town Council adopts this Resolution 26-16, adopting amendments to specific sections of the Policy Manual for Transit Related Employees attached hereto as Appendix A.

PASSED, APPROVED, AND ADOPTED this 3rd day of August, 2026.

TOWN OF JACKSON

Arne Jorgensen, Mayor

ATTEST: _____
Marisa N. Watsabaugh, Town Clerk

EXHIBIT A

AMENDMENTS TO THE POLICY MANUAL FOR TRANSIT RELATED EMPLOYEES

Unless shown below, all previously adopted sections of the Policy Manual for Transit Related Employees shall remain unchanged with the exception of the Table of Contents, the resolution update history for each section, and the page numbering.

402. Paid Leave Table

Paid Leave Table	
Paid Time Off (PTO) for Positions with Holiday, Vacation, & Sick Combined	Hours
First Year	240
1 Year Completed	240
2 Years Completed	240
3 Years Completed	240
4 Years Completed	240
5 Years Completed	296
6 Years Completed	306
7 Years Completed	306
8 Years Completed	306
9 Years Completed	306
10 Years Completed	316
11 Years Completed	316
12 Years Completed	316
13 Years Completed	316
14 Years Completed	316
15+ Years Completed	336
Paid Time Off (PTO) for Positions with Vacation & Sick Combined + Separate Holiday Stipend	Hours
First Year	152
1 Year Completed	152
2 Years Completed	152
3 Years Completed	152
4 Years Completed	152
5 Years Completed	208
6 Years Completed	218
7 Years Completed	218
8 Years Completed	218
9 Years Completed	218
10 Years Completed	228
11 Years Completed	228
12 Years Completed	228
13 Years Completed	228
14 Years Completed	228
15+ Years Completed	248
Other	Hours or Days
PTO Use Required for Dependent Leave or Sustainment Leave Eligibility	24 hours
PTO Buyout Maximum	40 hours
PTO Paid for Cancellation of Pre Approved PTO	40 hours
Dependent Leave	80 hours
Funeral Leave Regular/Extensive Travel/Death of a Child 21 or Under	24/40/80 hours
Work-Related Injury Leave Prior to Worker's Comp If Total Work-Related Injury Leave is 8 Days or Less	3 days
Emergency Service Leave	250 hours
Reserve and Guard Duty Leave	250 hours

403. Paid Time Off (PTO)

The Town of Jackson combines holidays, vacation, and sick leave into Paid Time Off (PTO) for full-time and part-time employees, except for full-time transit operators and transit system supervisor/dispatchers. Full-time transit operators and transit system supervisor/dispatchers receive combined vacation and sick leave into PTO as noted in the paid leave table and are provided an 8 hour holiday stipend at their regular rate of pay for each holiday as it occurs regardless of time worked during that week or on that holiday. All paid leave, whether PTO or other, is provided at the employee's base rate of pay.

PTO provision, expiration, and scheduling. PTO is provided on the employee's hire date and each year thereafter on their hire date anniversary. References to 'year' in the employee benefits section, unless specified, refers to the year between hire date anniversaries. PTO expires the day prior to the employee's hire date anniversary. Part-time employees are currently eligible for PTO benefits proportional to the number of budget authorized hours.

PTO is granted in a manner that minimizes interruptions to the operations of the Town. PTO days are to be planned and scheduled in advance whenever possible. Employees showing up for work are required to be physically and mentally able to work and are required to notify their supervisor if they are not physically or mentally able to perform their full duties. Employees that come to work obviously ill or injured or their obvious illness or injury may lead to others getting ill or injured, may be sent home at the discretion of their Department Director and required to utilize PTO. In the event the employee is absent for 4 or more workdays due to an illness or injury, medical certification may be required. The Town reserves the right to send an employee to a doctor of the Town's choosing at the Town's expense. The Town does not retaliate against an employee for utilizing unplanned PTO for an injury or illness.

PTO approval and use. Employees are encouraged to meet with their supervisor on their hire date anniversary to discuss and receive approval for planned PTO throughout the coming year. Use of PTO for full or partial days requires Department Director pre-approval except in the instance of utilizing PTO for unplanned instances. Employees must notify their supervisor each day at the beginning of their shift when they cannot come to work because of unplanned PTO use including illness, injury, birth of their child, medical care or other similar unplanned situation. Employees utilizing unplanned PTO shall inform their supervisor when they expect to return to work. PTO use during an employee's last 80 hours of work requires approval from the Director of Internal Services and the Town Manager.

The Town Manager may send staff home on a temporary basis for operational reasons and require staff to utilize PTO.

Net Leave. Full-time non-exempt employees that do not work 40 hours in a week (or 80 hours in a 2-week period for 7k exemption employees) are required to utilize PTO hours necessary to bring their hours to 40 (or 80 for 7k exemption employees). Part time non-exempt employees that do not work their regular schedule of hours in a week are required to utilize PTO hours necessary to bring their hours to their regular schedule of hours. Employees are only paid PTO hours necessary to bring their paid hours to their full schedule unless the employee indicates 'No Net Leave' on their time sheet during a 40/80

hour pay period where they intended to take PTO and ended up working extra hours on other days in that period. In that instance, a non-exempt employee will be paid for a full scheduled day of PTO time in addition to their hours worked during that period.

PTO buyback. The Town pays employees their unused PTO existing the day prior to their hire date anniversary up to the maximum noted in the paid leave table, unless they have used a portion of hours of other paid leave during the year, except for emergency service leave or reserve and guard duty. The Town pays employees up to the maximum hours of PTO noted in the paid leave table, if their pre-approved PTO was cancelled by the Town Manager due to operational needs. There is no PTO payout upon separation of employment.

Additional provisions. Upon the death of a Town employee, the Town pays a maximum of 40 hours of any remaining PTO.

Employees on a period of approved, planned PTO are not authorized to work during that period without specific director pre-approval, and for directors, without Town Manager pre-approval. The exception to this rule is if there is an emergency situation.

Reso 26-16, Reso 25-06

407. Funeral Leave

Department Directors are authorized to grant funeral leave as described. In the event of a death in their immediate family, full- and part-time employees are granted paid funeral leave noted in the paid leave table to attend a funeral or memorial service. If extensive travel is required or in the event of the death of a child 21 or younger, additional hours are granted as noted in the paid leave table. For the purposes of this supplemental leave, immediate family is defined as spouse, siblings, parents, children, grandparents, grandchildren, mother and father in-law, and eligible partners as defined in an Affidavit of Domestic Partnership for health care coverage. In the event of the death of a near relative, full and part-time employees are granted up to one paid day to attend a funeral. Near relatives include the employee's aunts, uncles, nieces, nephews, and their spouse's or partner's grandparents, brothers, sisters, and other close relatives. For funerals of friends, employees may take PTO or unpaid leave with approval of their Department Director.

Reso 26-16, Reso 25-06

409. Work-Related Injury Leave

For work related injuries where a doctor's note is provided and the employee has completed requisite worker's comp documentation, full and part-time employees are provided paid work-related injury leave. Employees may decline work-related injury leave retroactively 30 days prior to the end of the year, and in that instance, PTO will be deducted for that period of leave instead of work-related injury leave. Employees utilizing work-related injury leave must present a medical provider's statement indicating ability to return to work.

Reso 26-16, Reso 25-06

416. Administrative Leave/Suspension

Paid Administrative Leave/Paid Suspension. Employees may be placed on immediate paid administrative leave/paid suspension by their supervisor or Department Director. The duration of the paid administrative leave/paid suspension requires approval by the Director of Internal Services. Employees may be denied access to Town facilities and networks for the duration of their paid administrative leave/paid suspension.

Unpaid Administrative Leave/Unpaid Suspension. Unpaid administrative leave or unpaid suspension is a separate type of leave and is considered a disciplinary action.

Reso 26-16, Reso 25-06

505. Call-In Pay

Non-exempt employees may be called in from standby to perform work. Two hours of call-in, at the premium rate of one and one-half times the employee's base rate, is paid regardless of whether the work exceeds 40/80 hours. Any work performed in excess of 2 hours is paid at the premium rate of one and one-half times the employee's base rate regardless of whether the work is in excess of 40/80 hours. Failure to respond to a call or message during the employee's designated standby time may result in discipline.

Reso 26-16, Reso 25-06

512. Shift Differentials and Special Rates of Pay

To address specific purposes or provide incentives, the Town provides the following types of hourly shift differentials and special rates of pay to eligible employees in amounts approved by the Town Manager.

Police Officers – Driving Under the Influence (DUI), Enforcing Underage Drinking Laws (EUDL), and Highly Visible Enforcement (HVE)

Law enforcement work related to alcohol compliance and violations is of particular importance to the Wyoming Department of Transportation and the Wyoming Association of Sheriffs and Chiefs of Police and they are therefore incentivizing local governments to perform extra work in these areas by providing grant funds. Police Officers are provided a special rate of pay for work performed under this grant when marked on their time sheet as such.

Police Officers – Airport Duty

Airport duty is specialized work for Police Officers that requires a sworn officer be present but that is at a very different pace than regular law enforcement work in the Town of Jackson. Police Officers are provided a shift differential for work performed at the Jackson Hole Airport.

Police Officers – Performing Field Training Officer (FTO) Duties

FTO duties are critically important for training new officers and are usually performed by sworn officers with a rank of Corporal or above. Police Officers are provided a special rate of pay for work performed as an FTO.

Transit Operators – Commuter Route Driving

Operation of a START Bus through the Snake River Canyon and over Teton Pass, in heavy traffic and frequently in poor driving conditions can be hazardous and treacherous. Transit Operators are provided a shift differential for routes driven through the Snake River Canyon and over Teton Pass.

Transit Operators – Training Other Operators

Training Transit Operators while serving in a non-supervisory role is a higher level of responsibility. Transit Operators are provided a shift differential for work performed while training other Transit Operators.

Public Works Operators - Snow Removal Operations

Snow removal operations occur in the dark, during the winter, and frequently in challenging weather conditions. Public Works personnel performing snow removal operations, during shifts starting at 2:30AM or earlier on specific dates between November 1 and April 15 approved by the Public Works Director or their designee, are provided a shift differential.

Public Works Operators - Street Sweeping Operations

Street sweeping operations are conducted early, often in the dark, and require attention to detail with vehicles parked on the street. Public Works personnel performing street sweeping operations during shifts starting at 2:30AM or earlier are provided a shift differential.

Reso 26-16, Reso 25-06

612. Employee Ethics and Conflicts of Interest

Employees are held to a high ethical standard and expected to act accordingly. Employees shall comply with the Jackson Municipal Code as it relates to conflicts of interest. Employees can obtain a copy of excerpts from the Municipal Code regarding conflicts of interest on the Town's intranet, the internet, or from the Internal Services Department.

If employees have any questions about whether a situation is an ethical concern or a conflict of interest, they should refer the matter to the Director of Internal Services and/or the Town Attorney for final determination.

Reso 26-16, Reso 25-06

616. References

The Town does not furnish open letters of recommendation addressed "To Whom It May Concern."

If an employee receives an inquiry or reference request regarding a former or current employee, they are asked to refer that request to Internal Services. Only the Director of Internal Services or their designee has the authority to respond to such inquiries. This includes all types of references including, but not limited to verbal, written, electronic and social media.

Reso 26-16, Reso 25-05

619. Use of Town Property

Town property shall be used and cared for responsibly. Use of Town property is limited to Town purposes except for the following instances expressly permitted in this Policy Manual and limited to Town employees unless expressly authorized:

- Town mechanics utilizing the fleet maintenance work bays and limited tools and equipment of the Town to work on personal vehicles while not working.
- Use of printers/copiers for personal printing/copying/faxing so long as fees are paid for copies or printing with the exception of the first 5 pages.
- Vehicles as outlined in Section 620.
- Wash bay use as outlined in Section 621.
- Basement exercise facility use as outlined in Section 622.
- Use of Town phones, computers and equipment as outlined in Section 7 Communications.
- Use of common supplies for personal reasons including Kleenex, toilet paper, and other similar items.

Reso 26-16, Reso 25-06

620. Vehicles, Electric Bicycles, and Accidents/Collisions

Town vehicles shall only be used for Town purposes except for:

- incidental stops while traveling to and from official Town business,
- incidental travel (approximately 20 miles or less in total) for personal reasons that deviates from travel for Town purposes while traveling outside the community for Town business,
- authorized commuting,
- travel to and from the gym to work out (sworn law enforcement personnel residing in Teton County only).

Town vehicles include cars, trucks, equipment, and motorcycles. No person other than a Town employee, elected official, or appointed board member may operate a Town vehicle or electric bicycle. Federal, state, and local laws shall be followed at all times for vehicle and bicycle use and safe, prudent, and courteous behaviors are expected. Unnecessary idling shall be avoided. Failure to provide immediate notification to the employee's Department Director and the Director of Internal Services when there is a change in driver's license validity, class or endorsements is prohibited.

Non-Town Employee Passengers

Non-Town employee passengers are prohibited on electric bicycles. Non-Town employee passengers are prohibited in Town vehicles and equipment with the following exceptions:

- Customers of transit services.
- Police ride-along passengers that have executed a waiver of liability.
- Non-Town employee passengers associated with Town business or services provided by the Police Department.
- Elected or appointed Town board members with pre-approval.

- Passengers traveling with an employee, elected official, or appointed board member to, from, or during a conference or meeting.

Rented Vehicles

Additional insurance shall be obtained when vehicles are rented for Town purposes.

Pool Vehicles

The Town Manager approves employees/positions authorized regular or temporary use of pool vehicles. Employees may occasionally be asked to take a Town vehicle home for the purpose of plowing or sweeping parking lots.

Commuting

The Town Manager approves employees/positions authorized for commuter use of a Town vehicle on a regular or temporary basis. Employees may not use a Town vehicle to commute to or through destinations outside of the State of Wyoming or Teton County without specific authorization from the Town Manager or their designee. Employees authorized for commuter use shall not use the Town vehicle for personal use other than incidental stops while commuting. The Town follows all Internal Revenue Service (IRS) laws regarding taxable benefits as they relate to commuter authorization.

The Town recognizes the value of marked and unmarked police vehicles and sworn law enforcement personnel able to respond to calls for service in Teton County and immediately upon reaching the border of Teton County Wyoming and therefore allows sworn law enforcement personnel to commute on a regular basis with a personally assigned vehicle (PAV). PAVs shall only be stored at the employee's primary place of residence unless special permission is granted by the Chief of Police or their designee. Sworn law enforcement personnel operating a PAV shall wear or carry their badge, identification, sidearm, handcuffs, soft body armor and marked attire and shall adhere to operational guidelines.

The Town recognizes the value of quick response times for core facility and critical infrastructure emergencies and therefore allows employees in specific positions authorized by the Town Manager or their designee to commute on a regular basis with a PAV. PAVs in this category shall only be stored at the employee's primary place of residence unless special permission is granted by the Town Manager or their designee.

Personal Vehicle Use for Town Purposes

Occasionally the Town may require an employee to utilize their personal vehicle for Town purposes and any use requires Department Director approval. Mileage reimbursement for pre-approved use of a personal vehicle for occasional use is at the rate established by the United States General Services Administration (GSA) for the most current year utilizing the GSA Privately Owned Vehicle (POV) mileage reimbursement rate.

Electric Bicycles

Using a Town electric bicycle for Town purposes supports the Town's sustainability efforts. The following information does not apply to use of Town ebikes specifically designed for and used by law enforcement personnel. Employees, elected officials, or appointed board members may operate a Town electric bicycle only after they have executed an Electric Bicycle Waiver and Release of Claims. Employees shall not use Town electric bicycles for personal use other than incidental stops while traveling to or from

locations for Town purposes. Town electric bicycles shall not be used for commuting purposes. Additional use parameters:

- A bicycle helmet must be worn at all times.
- Phone or earphone use is prohibited.
- Use during storms, heavy rain, lightning, high winds, snow, or icy conditions is prohibited.

Accidents and Collisions

Any vehicle or electric bicycle accident or collision involving damage to a Town vehicle or electric bicycle, other vehicle or bicycle, persons, or property shall be reported immediately to the employee's supervisor who shall make an assessment and determine appropriate timing and necessity to further report the accident/collision to their Department Director, the Finance Director or their designee, and/or to law enforcement.

Employees are subject to post-accident drug and alcohol testing as set forth in separate drug and alcohol policies.

Reso 26-16, Reso 25-06

621. Wash Bay

Employees are authorized to wash personal vehicles in the Town wash bay pursuant to established procedures when not working, when it is not in use for Town purposes, and after they have completed requisite training and signed a waiver of liability. No one other than those listed below may drive a vehicle into or out of the wash bay, operate the wash bay equipment, or be present in the wash bay at any time other than inside a vehicle being washed without express permission of the Town Manager or their designee and only after they have completed requisite training and signed a waiver of liability.

- Town employee or Town elected official.
- Town dependent 18 years of age or older or elected official dependent 18 years of age or older.
- Employees of the Teton County Sheriff's Office.
- Members of Fire/EMS or Teton County Search and Rescue.
- Employees of Teton County Attorney's office.
- Judges and full-time employees of local court offices.
- Drivers of non-Town owned vehicles maintained by the Town of Jackson.
- Drivers of Teton County government vehicles.

Access to the wash bay will be revoked for users leaving the wash bay dirty or damaging equipment.

Reso 26-16, Reso 25-06

623. Travel

Town related travel and estimated expenses require pre-approval. Cost effective travel arrangements are to be utilized for employees travelling for Town purposes. Carpooling is expected when multiple employees are traveling to the same destination. Employees driving out of Town for Town purposes shall

utilize a Town vehicle unless approval has been given by their Department Director or the Town Manager to utilize a POV. If a POV has been authorized, mileage reimbursement shall be provided at the GSA POV mileage reimbursement rate. Personal side trips while travelling on Town business are not included in the POV mileage reimbursement, or require reimbursement to the Town by the employee if over 20 miles total. Mileage reimbursement for approved use of a personal vehicle while traveling will be at the rate established by the USGSA for the most current year.

Within 15 days of return from travel, employees, elected officials, and appointed board members shall complete a travel reconciliation form and attach receipts for all non-meal items. No receipts are required for meals and incidentals as the Town will only provide the per diem rates or a fixed reimbursement amount if travel is longer than 2 weeks and the type of lodging includes facilities for cooking. Meals and Incidentals (M&IE) rates from the GSA are utilized to pay employees for meals and incidentals after travel has concluded. Any meals provided as part of the conference or travel are deducted from the payment utilizing the separate amounts for breakfast, lunch, dinner, and incidentals.

Reso 26-16, Reso 25-06

625. Pets and Animals

Except for reasonable accommodations for service or emotional support animals required to comply with the Americans with Disabilities Act, in order to respect employees and members of the public that may have animal allergies, pets are prohibited in Town facilities and vehicles (including equipment), with the exception of housing units where pets are allowed, personal horses for mounted patrol (in Town owned trailer), case-by-case permission granted by a Department Director and approved by the Town Manager or their designee, or very occasionally on a single day occurrence when an employee may have an appointment for their pet, an emergency situation at home, or similar type of unplanned situation. Permission for case-by-case situations and occasional single-day occurrences may be rescinded by the Town Manager to protect the health, safety, and welfare of employees and members of the public, for consistency in policy application, and to maintain professionalism in offices frequented by members of the public. If approval is granted for an employee to have a pet with them during work, the employee is strictly liable for any damage or injury to persons or property, regardless of whether it involves Town employees or property, or other persons or property.

Reso 26-16, Reso 25-06

626. Procurement and Town Credit Cards

Employees shall comply with procurement guidelines established by the Town Manager or their designee. These guidelines are designed to set expectations for employees and to ensure transparency, accountability, and compliance with applicable laws and regulations.

Town credit cards shall be used only after approval by the employee's Department Director.

Reso 26-16, Reso 25-06

627. Reporting of Critical, Emergency, Provocative Incidents and Subpoenas, Civil Suits or Criminal Charges

A critical, emergency, or provocative incident is defined as:

- a potential community or organizational controversy,
- an issue that may damage trust or respect the organization or a department has built, or
- an issue that might upset, surprise or embarrass the Town Council, a department, or the organization.

Employees are required to report incidents of a critical, emergency, or provocative nature to their Department Director at the earliest possible opportunity. Directors are required to report incidents to the Town Manager and the Director of External Affairs at the earliest opportunity.

Employees must immediately report to their Department Director the personal service of a subpoena, involvement in a civil suit, or personal criminal charges when such may affect their attendance, ability to perform their job, employment, or the reputation of the Town organization. Police Department employees must immediately report these occurrences to the Chief of Police or their designee regardless of potential impacts on attendance, job performance, employment, or reputation of the Town.

Reso 26-16, Reso 25-06

710. Use of Artificial Intelligence (AI)

1. Purpose. This policy is intended to provide practical guidance for the responsible use of artificial intelligence (AI) by employees in a manner that supports innovation, improves efficiency, protects confidential information, preserves public trust, and promotes compliance with legal, records, privacy, security, and procurement requirements. *Employees may not input Restricted Town Data (as defined in this section) into publicly accessible or non-approved artificial intelligence platforms or tools. AI is a tool to support, not replace, the work of Town employees.*
2. Scope. This section applies to the use of artificial intelligence in Town operations, including administrative work, internal research, drafting, summarization, translation, transcription, coding assistance, data analysis, predictive tools, public communications, constituent services, legislative support, and other official Town activities in which an artificial intelligence system is used to generate content, analyze information, make recommendations, or assist with work.

This section applies whether the artificial intelligence capability is embedded in a larger software platform, accessed through a standalone tool, provided by a vendor, or used through a personal account or personally owned device for Town-related work.

3. Definitions. For purposes of this section, the following definitions apply.

Artificial Intelligence (AI). This is a class of computer software, tools, services, and systems or functionality within systems, that use large language models, algorithms, deep-learning, and machine learning models, and can generate new content, including but not limited to text, images, video, and audio, based on patterns and structures of input data. These also include

systems capable of ingesting input and translating that input into another form, such as text-to-code systems, and predictive model AI platforms and tools.

Human in the Loop (HITL). This is meaningful human review, judgment, and accountability over AI-assisted work before reliance, publication, communication, or action by the Town. HITL requires a responsible person to evaluate the accuracy, appropriateness, legality, and context of the AI-assisted output.

Restricted Town Data. This is all non-public, confidential, privileged, protected, law-enforcement-sensitive, personnel, health, financial, security-sensitive, attorney-client, or otherwise restricted Town information or data.

4. Standards for Use.

- a. **General Authorization and Responsibility.** Employees may use AI tools for Town work in a manner consistent with this section, other applicable Town policies, supervisory direction, and applicable law. Use of AI does not transfer responsibility from the employee. An employee remains accountable for the content, decision, communication, or action that results from AI-assisted work. All AI-assisted outputs adopted by an employee are considered that employee's work product.
- b. **HITL Requirement.** All use of AI shall include HITL oversight. AI may assist in drafting, analysis, research, and other work activities, but it may not serve as the final decision-maker for matters that require human judgment, legal compliance, public accountability, or the exercise of official Town discretion.
- c. **Standards for AI-Assisted Work.** When using AI tools, employees shall (i) review outputs for accuracy, completeness, and appropriateness before use; (ii) apply independent judgment rather than relying solely on AI output by default, and (iii) ensure that the final work product reflects informed HITL review and approval. AI may be used to assist in drafting, redrafting, or revising staff reports, agenda materials, memoranda, draft ordinances, draft resolutions, public information materials, and similar work product, provided that a responsible employee reviews the output and adopts the final content before it is presented, published, or relied upon.
- d. **Audio and Video Recording Tools.** Employees shall not knowingly or intentionally conceal use of AI during interaction with colleagues or the public, whether in person, in writing, or through digital communications, including but not limited to use of tools that may be recording or employing video and/or audio technologies.
- e. **Data Protection and Security.**
 - General Rule. Employees shall not enter any Restricted Town Data into an AI tool not approved for such use. Questions about whether data meets any of the parameters of Restricted Town Data shall be directed to the Town Attorney or their designee.
 - Approved Use of Restricted Town Data. Restricted Town Data may only be used in an AI tool that has been approved for that category of data and the use complies with applicable law, contract terms, retention requirements, security controls, and Town policy. The Director of I.T. or their designee must review and approve AI solutions and/or vendors for official Town use before such platforms and/or tools can be linked to any Town data sets and/or other Town technology platforms. Such approved AI

products must support retrieval and export of all outputs, either via exposed functionality or through vendor contract assurances.

No employee shall use AI in a manner that circumvents security controls, records obligations, legal review requirements, access controls, or established approval channels.

5. **Personal and Consumer Tools.** Employees shall not use personal or consumer AI tools for Town work in a manner that exposes Restricted Town Data, creates unauthorized system integrations, or bypasses required approvals.

Limited use of personal or consumer AI tools for routine convenience functions, such as language assistance, accessibility support, drafting help, or similar routine support, may be permitted when no Restricted Town Data is disclosed and the use does not create records, security, or public trust concerns inconsistent with this section. Employees uncertain whether a particular use qualifies shall consult their supervisor before proceeding.

Nothing in this section authorizes the connection of personal AI tools to Town systems, Town accounts, Town datasets, or Town-controlled workflows without prior written approval from the Director of I.T. or their designee.

6. **Records and Retention.** All final outputs, official communications, decisions, analyses, reports, or other records that are required to be retained remain subject to applicable public records and records retention requirements regardless of whether AI assisted in their creation.
7. **Administration.** The Town may issue procedures, guidance, training requirements, approval workflows, security standards, approved-tool lists, or departmental rules to implement this section.

Departments may impose stricter requirements for particular departments, data types, workflows, or risk categories where warranted.

Reso 26-16, Reso 25-06

803. Training Reimbursement and Training

Because of the expense incurred by the Town associated with recruitment, hiring, and training employees in certain positions, employees who separate employment prior to satisfying any agreed upon training reimbursement requirement are required to reimburse the Town either prior to departure or pursuant to repayment terms issued by the Town. Specific details of the reimbursement requirement are approved by the Town Manager or their designee and are provided to employees in their offer of employment and in a separate training reimbursement agreement provided at the time employment commences.

Police Officers

Police Officers hired without Police Officer Standards and Training (POST) certification and successful completion of a recognized field training program are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they leave employment prior to 2 years of sworn law enforcement service in the Jackson Police Department after completion of POST certification from the Wyoming Police Academy and completion of the Town of Jackson's field training program.

Public Works Operators

Public Works Operators hired without a Commercial Driver's License (CDL), that have the costs associated with obtaining that CDL paid by the Town of Jackson, are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they fail to obtain their CDL in the time frame set forth in their offer of employment or if they leave employment prior to 2 years of service to the Town of Jackson as licensed Operator.

Specialized Training

Because of expenses that may be incurred related to specialized training after employment has commenced, employees may be provided a specialized training reimbursement agreement at the time of that specialized training. Employees who separate employment prior to satisfying any agreed upon specialized training reimbursement requirement are required to reimburse the Town pursuant to their agreement either prior to departure or pursuant to repayment terms issued by the Town.

Training Programs and Professional Development

The Town of Jackson periodically conducts leadership development training for employees in the organization through an outside consultant. This type of training is budget dependent and class size can be limited. However, in most cases, any employee in the organization is welcome and encouraged to attend and participate without any entrance requirements.

Each Department in the organization has a supported training and professional development budget where training and professional development opportunities are identified, budgeted for, and employee attendance may be required based on the type of position held.

Participation in training and professional development plays a positive role in promotion and advancement opportunities.

Reso 26-16, Reso 25-06

ACKNOWLEDGEMENT OF RECEIPT

I HAVE RECEIVED A COPY OF THE AMENDED EMPLOYEE POLICY MANUAL FOR TRANSIT RELATED EMPLOYEES LAST AMENDED ON AUGUST 3, 2026. I UNDERSTAND THAT I AM TO BECOME FAMILIAR WITH ITS CONTENTS. FURTHER, I UNDERSTAND:

EMPLOYMENT WITH THE TOWN IS AT-WILL. I HAVE THE RIGHT TO END MY WORK RELATIONSHIP WITH THE TOWN, WITH OR WITHOUT ADVANCE NOTICE FOR ANY REASON. THE TOWN HAS THE SAME RIGHT.

THE LANGUAGE USED IN THIS POLICY MANUAL AND ANY VERBAL STATEMENTS OF MANAGEMENT ARE NOT INTENDED TO CONSTITUTE A CONTRACT OF EMPLOYMENT, EITHER EXPRESS OR IMPLIED, NOR ARE THEY A GUARANTEE OF EMPLOYMENT FOR A SPECIFIC DURATION.

THE POLICY MANUAL IS NOT ALL INCLUSIVE BUT IS INTENDED TO PROVIDE ME WITH A SUMMARY OF SOME OF THE TOWN'S GUIDELINES.

THIS EDITION REPLACES ALL PREVIOUSLY ISSUED POLICY MANUALS. THE NEED MAY ARISE TO CHANGE THE GUIDELINES DESCRIBED IN THE POLICY MANUAL, EXCEPT FOR THE AT-WILL NATURE OF EMPLOYMENT. THE TOWN, THEREFORE, RESERVES THE RIGHT TO INTERPRET THEM OR TO CHANGE THEM WITHOUT PRIOR NOTICE.

NO REPRESENTATIVE OF THE TOWN, OTHER THAN THE MAYOR AND COUNCIL HAVE AUTHORITY TO ENTER INTO AN AGREEMENT OF EMPLOYMENT WITH ANY EMPLOYEE OTHER THAN THE TOWN MANAGER, THE TOWN ATTORNEY, OR THE MUNICIPAL JUDGE FOR ANY SPECIFIED PERIOD, AND SUCH AGREEMENT MUST BE IN WRITING, SIGNED BY THE MAYOR AND THE EMPLOYEE. WE HAVE NOT ENTERED INTO SUCH AN AGREEMENT.

Signature

Employee Name

Date

Reso 26-16, Reso 25-06

Appendix A

Town of Jackson Wyoming Equal Employment Opportunity Policy Statement

The Town of Jackson has a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive to have a workforce that reflects the community we serve. No person is unlawfully excluded from employment opportunities based on race, color, religion, ancestry, creed, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, military status, or other protected classes or any other status protected by applicable federal, state, or local law.

The Town of Jackson's EEO policy applies to all employment actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation.

All applicants and employees have the right to file complaints alleging unlawful discrimination. Retaliation against an employee who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected activity is strictly prohibited and will not be tolerated.

The Town of Jackson is committed to providing reasonable accommodation to qualified applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship.

As the Town of Jackson Town Manager, I, Tyler Sinclair, maintain overall responsibility and accountability for the Town of Jackson's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed, Roxanne Robinson, the Director of Internal Services, as the Town of Jackson's EEO Officer. Roxanne Robinson reports directly to me for EEO purposes and acts with my authority for EEO purposes with all levels of management and employees.

All Town of Jackson executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring the Town of Jackson's EEO Policy and Program within their respective areas and may be assigned specific tasks to ensure compliance is achieved. The Town of Jackson evaluates the performance of its managers and supervisors in multiple areas including their successful implementation of the Town of Jackson's EEO policies and procedures in the same way the Town of Jackson assesses their performance regarding other goals for the organization.

The Town of Jackson is committed to maintaining its program regarding unlawful discrimination that sets forth the policies, practices and procedures, to which the Town is committed, and the Town of Jackson will make the EEO Policy and Program available for inspection by any employee or applicant for employment upon request.

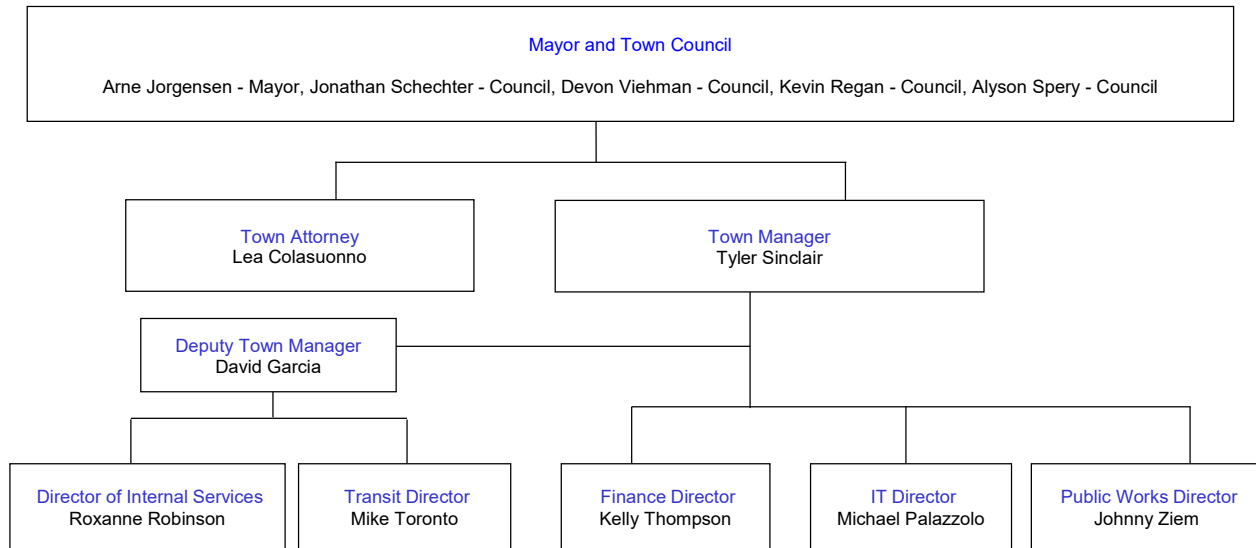
I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect under the guidelines of our EEO Policy and Program.

Tyler W. Sinclair, Town Manager

Date

Appendix B

Organizational Chart Showing Reporting Relationships of all Transit Related Directors, Department Heads, and Executive Leadership



Reso 26-16, Reso 25-06

RESOLUTION 26-17

**A RESOLUTION ADOPTING AMENDMENTS TO THE POLICY MANUAL FOR VICTIM SERVICES
EMPLOYEES**

EFFECTIVE AUGUST 3, 2026

WHEREAS, pursuant to Wyo. Stat. §15-3-204(b), the governing body by resolution may specify conditions for specific employee offices or positions within the Town organization; and

WHEREAS, these specific employee offices and positions conform to the same conditions as other employees in the Town organization; and

WHEREAS, adoption of policy manuals for Town employees by resolution establishes a clear way to track employee policies that protect and affect Town employees; and

WHEREAS, the Policy Manual for Victim Services Employees was adopted as Appendix A to Resolution 25-07 on March 17, 2025; and

WHEREAS, amendments to the Policy Manual for General Employees are recommended; and

WHEREAS, the Town Council, by adoption of this resolution, adopts amendments to specific sections of the Policy Manual for Victim Services Employees, attached hereto as Appendix A, which shall be incorporated into the Policy Manual for Victim Services Employees; and

WHEREAS, all previously adopted sections of the Policy Manual for Victim Services Employees shall remain unchanged with the exception of the Table of Contents, the resolution update history for each section, and the page numbering.

NOW THEREFORE BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF JACKSON, WYOMING, having fully considered the matter at hand,

The Jackson Town Council adopts this Resolution 26-17, adopting amendments to specific sections of the Policy Manual for Victim Services Employees attached hereto as Appendix A.

PASSED, APPROVED, AND ADOPTED this 3rd day of August, 2026.

TOWN OF JACKSON

Arne Jorgensen, Mayor

ATTEST: _____
Marisa N. Watsabaugh, Town Clerk

EXHIBIT A

AMENDMENTS TO THE POLICY MANUAL FOR VICTIM SERVICES EMPLOYEES

Unless shown below, all previously adopted sections of the Policy Manual for Victim Services Employees shall remain unchanged with the exception of the Table of Contents, the resolution update history for each section, and the page numbering.

402. Paid Leave Table

Paid Leave Table	
Paid Time Off (PTO) for Positions with Holiday, Vacation, & Sick Combined	Hours
First Year	240
1 Year Completed	240
2 Years Completed	240
3 Years Completed	240
4 Years Completed	240
5 Years Completed	296
6 Years Completed	306
7 Years Completed	306
8 Years Completed	306
9 Years Completed	306
10 Years Completed	316
11 Years Completed	316
12 Years Completed	316
13 Years Completed	316
14 Years Completed	316
15+ Years Completed	336
Paid Time Off (PTO) for Positions with Vacation & Sick Combined + Separate Holiday Stipend	Hours
First Year	152
1 Year Completed	152
2 Years Completed	152
3 Years Completed	152
4 Years Completed	152
5 Years Completed	208
6 Years Completed	218
7 Years Completed	218
8 Years Completed	218
9 Years Completed	218
10 Years Completed	228
11 Years Completed	228
12 Years Completed	228
13 Years Completed	228
14 Years Completed	228
15+ Years Completed	248
Other	Hours or Days
PTO Use Required for Dependent Leave or Sustainment Leave Eligibility	24 hours
PTO Buyout Maximum	40 hours
PTO Paid for Cancellation of Pre Approved PTO	40 hours
Dependent Leave	80 hours
Funeral Leave Regular/Extensive Travel/Death of a Child 21 or Under	24/40/80 hours
Work-Related Injury Leave Prior to Worker's Comp If Total Work-Related Injury Leave is 8 Days or Less	3 days
Emergency Service Leave	250 hours
Reserve and Guard Duty Leave	250 hours

403. Paid Time Off (PTO)

The Town of Jackson combines holidays, vacation, and sick leave into Paid Time Off (PTO) for full-time and part-time employees, except for full-time transit operators and transit system supervisor/dispatchers. Full-time transit operators and transit system supervisor/dispatchers receive combined vacation and sick leave into PTO as noted in the paid leave table and are provided an 8 hour holiday stipend at their regular rate of pay for each holiday as it occurs regardless of time worked during that week or on that holiday. All paid leave, whether PTO or other, is provided at the employee's base rate of pay.

PTO provision, expiration, and scheduling. PTO is provided on the employee's hire date and each year thereafter on their hire date anniversary. References to 'year' in the employee benefits section, unless specified, refers to the year between hire date anniversaries. PTO expires the day prior to the employee's hire date anniversary. Part-time employees are currently eligible for PTO benefits proportional to the number of budget authorized hours.

PTO is granted in a manner that minimizes interruptions to the operations of the Town. PTO days are to be planned and scheduled in advance whenever possible. Employees showing up for work are required to be physically and mentally able to work and are required to notify their supervisor if they are not physically or mentally able to perform their full duties. Employees that come to work obviously ill or injured or their obvious illness or injury may lead to others getting ill or injured, may be sent home at the discretion of their Department Director and required to utilize PTO. In the event the employee is absent for 4 or more workdays due to an illness or injury, medical certification may be required. The Town reserves the right to send an employee to a doctor of the Town's choosing at the Town's expense. The Town does not retaliate against an employee for utilizing unplanned PTO for an injury or illness.

PTO approval and use. Employees are encouraged to meet with their supervisor on their hire date anniversary to discuss and receive approval for planned PTO throughout the coming year. Use of PTO for full or partial days requires Department Director pre-approval except in the instance of utilizing PTO for unplanned instances. Employees must notify their supervisor each day at the beginning of their shift when they cannot come to work because of unplanned PTO use including illness, injury, birth of their child, medical care or other similar unplanned situation. Employees utilizing unplanned PTO shall inform their supervisor when they expect to return to work. PTO use during an employee's last 80 hours of work requires approval from the Director of Internal Services and the Town Manager.

The Town Manager may send staff home on a temporary basis for operational reasons and require staff to utilize PTO.

Net Leave. Full-time non-exempt employees that do not work 40 hours in a week (or 80 hours in a 2-week period for 7k exemption employees) are required to utilize PTO hours necessary to bring their hours to 40 (or 80 for 7k exemption employees). Part time non-exempt employees that do not work their regular schedule of hours in a week are required to utilize PTO hours necessary to bring their hours to their regular schedule of hours. Employees are only paid PTO hours necessary to bring their paid hours

to their full schedule unless the employee indicates 'No Net Leave' on their time sheet during a 40/80 hour pay period where they intended to take PTO and ended up working extra hours on other days in that period. In that instance, a non-exempt employee will be paid for a full scheduled day of PTO time in addition to their hours worked during that period.

PTO buyback. The Town pays employees their unused PTO existing the day prior to their hire date anniversary up to the maximum noted in the paid leave table, unless they have used a portion of hours of other paid leave during the year, except for emergency service leave or reserve and guard duty. The Town pays employees up to the maximum hours of PTO noted in the paid leave table, if their pre-approved PTO was cancelled by the Town Manager due to operational needs. There is no PTO payout upon separation of employment.

Additional provisions. Upon the death of a Town employee, the Town pays a maximum of 40 hours of any remaining PTO.

Employees on a period of approved, planned PTO are not authorized to work during that period without specific director pre-approval, and for directors, without Town Manager pre-approval. The exception to this rule is if there is an emergency situation.

Reso 26-17, Reso 25-07

407. Funeral Leave

Department Directors are authorized to grant funeral leave as described. In the event of a death in their immediate family, full- and part-time employees are granted paid funeral leave noted in the paid leave table to attend a funeral or memorial service. If extensive travel is required or in the event of the death of a child 21 or younger, additional hours are granted as noted in the paid leave table. For the purposes of this supplemental leave, immediate family is defined as spouse, siblings, parents, children, grandparents, grandchildren, mother and father in-law, and eligible partners as defined in an Affidavit of Domestic Partnership for health care coverage. In the event of the death of a near relative, full and part-time employees are granted up to one paid day to attend a funeral. Near relatives include the employee's aunts, uncles, nieces, nephews, and their spouse's or partner's grandparents, brothers, sisters, and other close relatives. For funerals of friends, employees may take PTO or unpaid leave with approval of their Department Director.

Reso 26-17, Reso 25-07

409. Work-Related Injury Leave

For work related injuries where a doctor's note is provided and the employee has completed requisite worker's comp documentation, full and part-time employees are provided paid work-related injury leave. Employees may decline work-related injury leave retroactively 30 days prior to the end of the year, and in that instance, PTO will be deducted for that period of leave instead of work-related injury leave. Employees utilizing work-related injury leave must present a medical provider's statement indicating ability to return to work.

416. Administrative Leave/Suspension

Paid Administrative Leave/Paid Suspension. Employees may be placed on immediate paid administrative leave/paid suspension by their supervisor or Department Director. The duration of the paid administrative leave/paid suspension requires approval by the Director of Internal Services. Employees may be denied access to Town facilities and networks for the duration of their paid administrative leave/paid suspension.

Unpaid Administrative Leave/Unpaid Suspension. Unpaid administrative leave or unpaid suspension is a separate type of leave and is considered a disciplinary action.

Reso 26-17, Reso 25-07

505. Call-In Pay

Non-exempt employees may be called in from standby to perform work. Two hours of call-in, at the premium rate of one and one-half times the employee's base rate, is paid regardless of whether the work exceeds 40/80 hours. Any work performed in excess of 2 hours is paid at the premium rate of one and one-half times the employee's base rate regardless of whether the work is in excess of 40/80 hours. Failure to respond to a call or message during the employee's designated standby time may result in discipline.

Reso 26-17, Reso 25-07

512. Shift Differentials and Special Rates of Pay

To address specific purposes or provide incentives, the Town provides the following types of hourly shift differentials and special rates of pay to eligible employees in amounts approved by the Town Manager.

Police Officers – Driving Under the Influence (DUI), Enforcing Underage Drinking Laws (EUDL), and Highly Visible Enforcement (HVE)

Law enforcement work related to alcohol compliance and violations is of particular importance to the Wyoming Department of Transportation and the Wyoming Association of Sheriffs and Chiefs of Police and they are therefore incentivizing local governments to perform extra work in these areas by providing grant funds. Police Officers are provided a special rate of pay for work performed under this grant when marked on their time sheet as such.

Police Officers – Airport Duty

Airport duty is specialized work for Police Officers that requires a sworn officer be present but that is at a very different pace than regular law enforcement work in the Town of Jackson. Police Officers are provided a shift differential for work performed at the Jackson Hole Airport.

Police Officers – Performing Field Training Officer (FTO) Duties

FTO duties are critically important for training new officers and are usually performed by sworn officers with a rank of Corporal or above. Police Officers are provided a special rate of pay for work performed as an FTO.

Transit Operators – Commuter Route Driving

Operation of a START Bus through the Snake River Canyon and over Teton Pass, in heavy traffic and frequently in poor driving conditions can be hazardous and treacherous. Transit Operators are provided a shift differential for routes driven through the Snake River Canyon and over Teton Pass.

Transit Operators – Training Other Operators

Training Transit Operators while serving in a non-supervisory role is a higher level of responsibility. Transit Operators are provided a shift differential for work performed while training other Transit Operators.

Public Works Operators - Snow Removal Operations

Snow removal operations occur in the dark, during the winter, and frequently in challenging weather conditions. Public Works personnel performing snow removal operations, during shifts starting at 2:30AM or earlier on specific dates between November 1 and April 15 approved by the Public Works Director or their designee, are provided a shift differential.

Public Works Operators - Street Sweeping Operations

Street sweeping operations are conducted early, often in the dark, and require attention to detail with vehicles parked on the street. Public Works personnel performing street sweeping operations during shifts starting at 2:30AM or earlier are provided a shift differential.

Reso 26-17, Reso 25-07

612. Employee Ethics and Conflicts of Interest

Employees are held to a high ethical standard and expected to act accordingly. Employees shall comply with the Jackson Municipal Code as it relates to conflicts of interest. Employees can obtain a copy of excerpts from the Municipal Code regarding conflicts of interest on the Town's intranet, the internet, or from the Internal Services Department.

If employees have any questions about whether a situation is an ethical concern or a conflict of interest, they should refer the matter to the Director of Internal Services and/or the Town Attorney for final determination.

TCVS employees often have uncensored and unquestioned access to people, information, resources and positions of trust not easily available to the general citizen. Care will be taken to properly identify potential conflicts of interest, in order to avoid the appearance of impropriety and to preserve the public's trust.

Reso 26-17, Reso 25-07

616. References

The Town does not furnish open letters of recommendation addressed “To Whom It May Concern.”

If an employee receives an inquiry or reference request regarding a former or current employee, they are asked to refer that request to Internal Services. Only the Director of Internal Services or their designee has the authority to respond to such inquiries. This includes all types of references including, but not limited to verbal, written, electronic and social media.

Reso 26-17, Reso 25-07

619. Use of Town Property

Town property shall be used and cared for responsibly. Use of Town property is limited to Town purposes except for the following instances expressly permitted in this Policy Manual and limited to Town employees unless expressly authorized:

- Town mechanics utilizing the fleet maintenance work bays and limited tools and equipment of the Town to work on personal vehicles while not working.
- Use of printers/copiers for personal printing/copying/faxing so long as fees are paid for copies or printing with the exception of the first 5 pages.
- Vehicles as outlined in Section 620.
- Wash bay use as outlined in Section 621.
- Basement exercise facility use as outlined in Section 622.
- Use of Town phones, computers and equipment as outlined in Section 7 Communications.
- Use of common supplies for personal reasons including Kleenex, toilet paper, and other similar items.

Reso 26-17, Reso 25-07

620. Vehicles, Electric Bicycles, and Accidents/Collisions

Town vehicles shall only be used for Town purposes except for:

- incidental stops while traveling to and from official Town business,
- incidental travel (approximately 20 miles or less in total) for personal reasons that deviates from travel for Town purposes while traveling outside the community for Town business,
- authorized commuting,
- travel to and from the gym to work out (sworn law enforcement personnel residing in Teton County only).

Town vehicles include cars, trucks, equipment, and motorcycles. No person other than a Town employee, elected official, or appointed board member may operate a Town vehicle or electric bicycle. Federal, state, and local laws shall be followed at all times for vehicle and bicycle use and safe, prudent, and courteous behaviors are expected. Unnecessary idling shall be avoided. Failure to provide immediate notification to the employee’s Department Director and the Director of Internal Services when there is a change in driver’s license validity, class or endorsements is prohibited.

Non-Town Employee Passengers

Non-Town employee passengers are prohibited on electric bicycles. Non-Town employee passengers are prohibited in Town vehicles and equipment with the following exceptions:

- Customers of transit services.
- Police ride-along passengers that have executed a waiver of liability.
- Non-Town employee passengers associated with Town business or services provided by the Police Department.
- Elected or appointed Town board members with pre-approval.
- Passengers traveling with an employee, elected official, or appointed board member to, from, or during a conference or meeting.

TCVS staff is discouraged from transporting intoxicated, actively suicidal people, runaways, or others who may pose a physical threat or liability to people served or staff. In these types of situations or circumstances, law enforcement or other emergency transport may be warranted. When needed, TCVS staff will utilize a Town of Jackson vehicle or an unmarked police/sheriff's car.

Rented Vehicles

Additional insurance shall be obtained when vehicles are rented for Town purposes.

Pool Vehicles

The Town Manager approves employees/positions authorized regular or temporary use of pool vehicles. Employees may occasionally be asked to take a Town vehicle home for the purpose of plowing or sweeping parking lots.

Commuting

The Town Manager approves employees/positions authorized for commuter use of a Town vehicle on a regular or temporary basis. Employees may not use a Town vehicle to commute to or through destinations outside of the State of Wyoming or Teton County without specific authorization from the Town Manager or their designee. Employees authorized for commuter use shall not use the Town vehicle for personal use other than incidental stops while commuting. The Town follows all Internal Revenue Service (IRS) laws regarding taxable benefits as they relate to commuter authorization.

The Town recognizes the value of marked and unmarked police vehicles and sworn law enforcement personnel able to respond to calls for service in Teton County and immediately upon reaching the border of Teton County Wyoming and therefore allows sworn law enforcement personnel to commute on a regular basis with a personally assigned vehicle (PAV). PAVs shall only be stored at the employee's primary place of residence unless special permission is granted by the Chief of Police or their designee. Sworn law enforcement personnel operating a PAV shall wear or carry their badge, identification, sidearm, handcuffs, soft body armor and marked attire and shall adhere to operational guidelines.

The Town recognizes the value of quick response times for core facility and critical infrastructure emergencies and therefore allows employees in specific positions authorized by the Town Manager or their designee to commute on a regular basis with a PAV. PAVs in this category shall only be stored at the employee's primary place of residence unless special permission is granted by the Town Manager or their designee.

Personal Vehicle Use for Town Purposes

Occasionally the Town may require an employee to utilize their personal vehicle for Town purposes and any use requires Department Director approval. Mileage reimbursement for pre-approved use of a personal vehicle for occasional use is at the rate established by the United States General Services Administration (GSA) for the most current year utilizing the GSA Privately Owned Vehicle (POV) mileage reimbursement rate. [TCVS advocates shall not transport clients in personal vehicles and will instead seek transportation assistance from either law enforcement, Uber/Lyft, or a taxi.](#)

Electric Bicycles

Using a Town electric bicycle for Town purposes supports the Town's sustainability efforts. The following information does not apply to use of Town ebikes specifically designed for and used by law enforcement personnel. Employees, elected officials, or appointed board members may operate a Town electric bicycle only after they have executed an Electric Bicycle Waiver and Release of Claims. Employees shall not use Town electric bicycles for personal use other than incidental stops while traveling to or from locations for Town purposes. Town electric bicycles shall not be used for commuting purposes. Additional use parameters:

- A bicycle helmet must be worn at all times.
- Phone or earphone use is prohibited.
- Use during storms, heavy rain, lightning, high winds, snow, or icy conditions is prohibited.

Accidents and Collisions

Any vehicle or electric bicycle accident or collision involving damage to a Town vehicle or electric bicycle, other vehicle or bicycle, persons, or property shall be reported immediately to the employee's supervisor who shall make an assessment and determine appropriate timing and necessity to further report the accident/collision to their Department Director, the Finance Director or their designee, and/or to law enforcement.

Employees are subject to post-accident drug and alcohol testing as set forth in separate drug and alcohol policies.

Reso 26-17, Reso 25-07

621. Wash Bay

Employees are authorized to wash personal vehicles in the Town wash bay pursuant to established procedures when not working, when it is not in use for Town purposes, and after they have completed requisite training and signed a waiver of liability. No one other than those listed below may drive a vehicle into or out of the wash bay, operate the wash bay equipment, or be present in the wash bay at any time other than inside a vehicle being washed without express permission of the Town Manager or their designee and only after they have completed requisite training and signed a waiver of liability.

- Town employee or Town elected official.
- Town dependent 18 years of age or older or elected official dependent 18 years of age or older.
- Employees of the Teton County Sheriff's Office.
- Members of Fire/EMS or Teton County Search and Rescue.

- Employees of Teton County Attorney's office.
- Judges and full-time employees of local court offices.
- Drivers of non-Town owned vehicles maintained by the Town of Jackson.
- Drivers of Teton County government vehicles.

Access to the wash bay will be revoked for users leaving the wash bay dirty or damaging equipment.

Reso 26-17, Reso 25-07

623. Travel

Town related travel and estimated expenses require pre-approval. Cost effective travel arrangements are to be utilized for employees travelling for Town purposes. Carpooling is expected when multiple employees are traveling to the same destination. Employees driving out of Town for Town purposes shall utilize a Town vehicle unless approval has been given by their Department Director or the Town Manager to utilize a POV. If a POV has been authorized, mileage reimbursement shall be provided at the GSA POV mileage reimbursement rate. Personal side trips while travelling on Town business are not included in the POV mileage reimbursement, or require reimbursement to the Town by the employee if over 20 miles total. Mileage reimbursement for approved use of a personal vehicle while traveling will be at the rate established by the USGSA for the most current year.

Within 15 days of return from travel, employees, elected officials, and appointed board members shall complete a travel reconciliation form and attach receipts for all non-meal items. No receipts are required for meals and incidentals as the Town will only provide the per diem rates or a fixed reimbursement amount if travel is longer than 2 weeks and the type of lodging includes facilities for cooking. Meals and Incidentals (M&IE) rates from the GSA are utilized to pay employees for meals and incidentals after travel has concluded. Any meals provided as part of the conference or travel are deducted from the payment utilizing the separate amounts for breakfast, lunch, dinner, and incidentals.

Reso 26-17, Reso 25-07

625. Pets and Animals

Except for reasonable accommodations for service or emotional support animals required to comply with the Americans with Disabilities Act, in order to respect employees and members of the public that may have animal allergies, pets are prohibited in Town facilities and vehicles (including equipment), with the exception of housing units where pets are allowed, personal horses for mounted patrol (in Town owned trailer), case-by-case permission granted by a Department Director and approved by the Town Manager or their designee, or very occasionally on a single day occurrence when an employee may have an appointment for their pet, an emergency situation at home, or similar type of unplanned situation. Permission for case-by-case situations and occasional single-day occurrences may be rescinded by the Town Manager to protect the health, safety, and welfare of employees and members of the public, for consistency in policy application, and to maintain professionalism in offices frequented by members of the public. If approval is granted for an employee to have a pet with them during work, the employee is strictly liable for any damage or injury to persons or property, regardless of whether it involves Town employees or property, or other persons or property.

626. Procurement, Town Credit Cards, Fiscal Policies, and Gift Cards

Employees shall comply with procurement guidelines established by the Town Manager or their designee. These guidelines are designed to set expectations for employees and to ensure transparency, accountability, and compliance with applicable laws and regulations.

Town credit cards shall be used only after approval by the employee's Department Director.

TCVS finances are managed, processed, and paid through the Town Finance Department with proper coding of receipts and account numbers completed by the Victim Services Coordinator and the annual budget approved by the Town Council. TCVS does not accept cash donations. Donations to TCVS are encouraged through Old Bill's Fun Run, in which TCVS is a participant, with the application and reports completed by the Victim Services Coordinator. All use of funds from Old Bill's Fun Run are deposited with the Town Finance Department and shall comply with the grant and application as set forth in the rules and procedures for Old Bill's Fun Run. Donations and restitution outside of Old Bill's Fun Run are processed through the Town Finance Department.

Emergency funds for crime victims are funded by the DVS and Old Bill's Fun Run donations, and any use of emergency funds are approved by the Victim Services Coordinator and processed through a documented case file outlining the need and a plan for the use of funds.

The Victim Services Coordinator shall ensure that all reimbursement accounts and line items are accurate prior to submittal to the DVS for monthly reimbursement.

Any requests for purchases of office equipment for TCVS purposes shall receive approval through the Town of Jackson budget process prior to purchase that shall include justification, and projected expense. Any disposal or destruction of office equipment tagged with Town of Jackson asset management tags must be approved by the proper Town of Jackson Department Director or the Town Attorney prior to disposal or destruction.

TCVS shall cooperate and comply with all requests by the Town of Jackson auditor and Finance Director.

All TCVS gift cards funded through Old Bill's Fun Run donations are stored in a locked file drawer in the TCVS offices with access restricted to the Victim Services Coordinator along with a complete accounting of the total number of cards. When a gift card is issued, the TCVS employee issuing the gift card will complete a required form noting the amount of the card, the recipient of the card (with identifying information protected for security as appropriate), the date the card was issued, where the gift card was issued from, and the initials of the TCVS employee issuing the gift card. Gift cards shall not be utilized for tobacco or alcohol purchases and are limited to use in instances when a victim needs funds to leave the community.

627. Reporting of Critical, Emergency, Provocative Incidents and Subpoenas, Civil Suits or Criminal Charges

A critical, emergency, or provocative incident is defined as:

- a potential community or organizational controversy,
- an issue that may damage trust or respect the organization or a department has built, or
- an issue that might upset, surprise or embarrass the Town Council, a department, or the organization.

Employees are required to report incidents of a critical, emergency, or provocative nature to their Department Director at the earliest possible opportunity. Directors are required to report incidents to the Town Manager and the Director of External Affairs at the earliest opportunity.

Employees must immediately report to their Department Director the personal service of a subpoena, involvement in a civil suit, or personal criminal charges when such may affect their attendance, ability to perform their job, employment, or the reputation of the Town organization. Police Department employees must immediately report these occurrences to the Chief of Police or their designee regardless of potential impacts on attendance, job performance, employment, or reputation of the Town.

Reso 26-17, Reso 25-07

710. Use of Artificial Intelligence (AI)

1. Purpose. This policy is intended to provide practical guidance for the responsible use of artificial intelligence (AI) by employees in a manner that supports innovation, improves efficiency, protects confidential information, preserves public trust, and promotes compliance with legal, records, privacy, security, and procurement requirements. *Employees may not input Restricted Town Data (as defined in this section) into publicly accessible or non-approved artificial intelligence platforms or tools. AI is a tool to support, not replace, the work of Town employees.*
2. Scope. This section applies to the use of artificial intelligence in Town operations, including administrative work, internal research, drafting, summarization, translation, transcription, coding assistance, data analysis, predictive tools, public communications, constituent services, legislative support, and other official Town activities in which an artificial intelligence system is used to generate content, analyze information, make recommendations, or assist with work.

This section applies whether the artificial intelligence capability is embedded in a larger software platform, accessed through a standalone tool, provided by a vendor, or used through a personal account or personally owned device for Town-related work.

3. Definitions. For purposes of this section, the following definitions apply.

Artificial Intelligence (AI). This is a class of computer software, tools, services, and systems or functionality within systems, that use large language models, algorithms, deep-learning, and machine learning models, and can generate new content, including but not limited to text, images, video, and audio, based on patterns and structures of input data. These also include

systems capable of ingesting input and translating that input into another form, such as text-to-code systems, and predictive model AI platforms and tools.

Human in the Loop (HITL). This is meaningful human review, judgment, and accountability over AI-assisted work before reliance, publication, communication, or action by the Town. HITL requires a responsible person to evaluate the accuracy, appropriateness, legality, and context of the AI-assisted output.

Restricted Town Data. This is all non-public, confidential, privileged, protected, law-enforcement-sensitive, personnel, health, financial, security-sensitive, attorney-client, or otherwise restricted Town information or data.

4. Standards for Use.

- a. **General Authorization and Responsibility.** Employees may use AI tools for Town work in a manner consistent with this section, other applicable Town policies, supervisory direction, and applicable law. Use of AI does not transfer responsibility from the employee. An employee remains accountable for the content, decision, communication, or action that results from AI-assisted work. All AI-assisted outputs adopted by an employee are considered that employee's work product.
- b. **HITL Requirement.** All use of AI shall include HITL oversight. AI may assist in drafting, analysis, research, and other work activities, but it may not serve as the final decision-maker for matters that require human judgment, legal compliance, public accountability, or the exercise of official Town discretion.
- c. **Standards for AI-Assisted Work.** When using AI tools, employees shall (i) review outputs for accuracy, completeness, and appropriateness before use; (ii) apply independent judgment rather than relying solely on AI output by default, and (iii) ensure that the final work product reflects informed HITL review and approval. AI may be used to assist in drafting, redrafting, or revising staff reports, agenda materials, memoranda, draft ordinances, draft resolutions, public information materials, and similar work product, provided that a responsible employee reviews the output and adopts the final content before it is presented, published, or relied upon.
- d. **Audio and Video Recording Tools.** Employees shall not knowingly or intentionally conceal use of AI during interaction with colleagues or the public, whether in person, in writing, or through digital communications, including but not limited to use of tools that may be recording or employing video and/or audio technologies.
- e. **Data Protection and Security.**
 - General Rule. Employees shall not enter any Restricted Town Data into an AI tool not approved for such use. Questions about whether data meets any of the parameters of Restricted Town Data shall be directed to the Town Attorney or their designee.
 - Approved Use of Restricted Town Data. Restricted Town Data may only be used in an AI tool that has been approved for that category of data and the use complies with applicable law, contract terms, retention requirements, security controls, and Town policy. The Director of I.T. or their designee must review and approve AI solutions and/or vendors for official Town use before such platforms and/or tools can be linked to any Town data sets and/or other Town technology platforms. Such approved AI

products must support retrieval and export of all outputs, either via exposed functionality or through vendor contract assurances.

No employee shall use AI in a manner that circumvents security controls, records obligations, legal review requirements, access controls, or established approval channels.

5. **Personal and Consumer Tools.** Employees shall not use personal or consumer AI tools for Town work in a manner that exposes Restricted Town Data, creates unauthorized system integrations, or bypasses required approvals.

Limited use of personal or consumer AI tools for routine convenience functions, such as language assistance, accessibility support, drafting help, or similar routine support, may be permitted when no Restricted Town Data is disclosed and the use does not create records, security, or public trust concerns inconsistent with this section. Employees uncertain whether a particular use qualifies shall consult their supervisor before proceeding.

Nothing in this section authorizes the connection of personal AI tools to Town systems, Town accounts, Town datasets, or Town-controlled workflows without prior written approval from the Director of I.T. or their designee.

6. **Records and Retention.** All final outputs, official communications, decisions, analyses, reports, or other records that are required to be retained remain subject to applicable public records and records retention requirements regardless of whether AI assisted in their creation.
7. **Administration.** The Town may issue procedures, guidance, training requirements, approval workflows, security standards, approved-tool lists, or departmental rules to implement this section.

Departments may impose stricter requirements for particular departments, data types, workflows, or risk categories where warranted.

Reso 26-17, Reso 25-07

803. Training Reimbursement and Training

Because of the expense incurred by the Town associated with recruitment, hiring, and training employees in certain positions, employees who separate employment prior to satisfying any agreed upon training reimbursement requirement are required to reimburse the Town either prior to departure or pursuant to repayment terms issued by the Town. Specific details of the reimbursement requirement are approved by the Town Manager or their designee and are provided to employees in their offer of employment and in a separate training reimbursement agreement provided at the time employment commences.

Police Officers

Police Officers hired without Police Officer Standards and Training (POST) certification and successful completion of a recognized field training program are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they leave employment prior to 2 years of sworn law enforcement service in the Jackson Police Department after completion of POST certification from the Wyoming Police Academy and completion of the Town of Jackson's field training program.

Public Works Operators

Public Works Operators hired without a Commercial Driver's License (CDL), that have the costs associated with obtaining that CDL paid by the Town of Jackson, are required to reimburse the Town for specific costs as set forth in a training reimbursement agreement should they fail to obtain their CDL in the time frame set forth in their offer of employment or if they leave employment prior to 2 years of service to the Town of Jackson as licensed Operator.

Specialized Training

Because of expenses that may be incurred related to specialized training after employment has commenced, employees may be provided a specialized training reimbursement agreement at the time of that specialized training. Employees who separate employment prior to satisfying any agreed upon specialized training reimbursement requirement are required to reimburse the Town pursuant to their agreement either prior to departure or pursuant to repayment terms issued by the Town.

Training for TCVS Employees

The Town of Jackson is committed to training and development for TCVS employees to help develop their personal and organizational skills, knowledge, and abilities and address stress in their profession. Training may include formal coursework, conferences, and informal learning opportunities. The budget and authorization for training opportunities shall be considered on an annual basis for TCVS employees and may include national training conferences such as End Violence Against Women International/Dallas Crimes Against Women/Dallas Crimes Against Children. TCVS employees may also suggest appropriate training to the Victim Services Coordinator and Chief of Police for consideration. Leadership in the JPD shall inform TCVS employees of available relevant departmental training. Training records shall be submitted to the Internal Service Department for inclusion in the employee's file.

Reso 26-17, Reso 25-07

ACKNOWLEDGEMENT OF RECEIPT

I HAVE RECEIVED A COPY OF THE AMENDED EMPLOYEE POLICY MANUAL FOR VICTIM SERVICES EMPLOYEES LAST AMENDED ON AUGUST 3, 2026. I UNDERSTAND THAT I AM TO BECOME FAMILIAR WITH ITS CONTENTS. FURTHER, I UNDERSTAND:

EMPLOYMENT WITH THE TOWN IS AT-WILL. I HAVE THE RIGHT TO END MY WORK RELATIONSHIP WITH THE TOWN, WITH OR WITHOUT ADVANCE NOTICE FOR ANY REASON. THE TOWN HAS THE SAME RIGHT.

THE LANGUAGE USED IN THIS POLICY MANUAL AND ANY VERBAL STATEMENTS OF MANAGEMENT ARE NOT INTENDED TO CONSTITUTE A CONTRACT OF EMPLOYMENT, EITHER EXPRESS OR IMPLIED, NOR ARE THEY A GUARANTEE OF EMPLOYMENT FOR A SPECIFIC DURATION.

THE POLICY MANUAL IS NOT ALL INCLUSIVE BUT IS INTENDED TO PROVIDE ME WITH A SUMMARY OF SOME OF THE TOWN'S GUIDELINES.

THIS EDITION REPLACES ALL PREVIOUSLY ISSUED POLICY MANUALS. THE NEED MAY ARISE TO CHANGE THE GUIDELINES DESCRIBED IN THE POLICY MANUAL, EXCEPT FOR THE AT-WILL NATURE OF EMPLOYMENT. THE TOWN, THEREFORE, RESERVES THE RIGHT TO INTERPRET THEM OR TO CHANGE THEM WITHOUT PRIOR NOTICE.

NO REPRESENTATIVE OF THE TOWN, OTHER THAN THE MAYOR AND COUNCIL HAVE AUTHORITY TO ENTER INTO AN AGREEMENT OF EMPLOYMENT WITH ANY EMPLOYEE OTHER THAN THE TOWN MANAGER, THE TOWN ATTORNEY, OR THE MUNICIPAL JUDGE FOR ANY SPECIFIED PERIOD, AND SUCH AGREEMENT MUST BE IN WRITING, SIGNED BY THE MAYOR AND THE EMPLOYEE. WE HAVE NOT ENTERED INTO SUCH AN AGREEMENT.

Signature

Employee Name

Date

Reso 26-17, Reso 25-07

STAFF REPORT



Meeting Date:	August 3, 2026	Meeting Title:	Regular
Submitting Department:	Building Department	Presenter:	Kelly Sluder Lea Colasuonno
Agenda Item:	Ordinance F: An Ordinance Amending Contractor Licensing Requirements (PM26-0018)	Public Comment:	Yes.

Purpose or Policy Considerations

To approve at First Reading, Ordinance F, to amend Title 15.36 Contractor Licensing to eliminate the Journeyman and Apprentice trade qualifications and to eliminate the current out-of-state reciprocity program.

Recommendations.

Staff recommend approval of Ordinance F at First Reading.

Background

The Council approved these text amendments to Title 15.36 in the Town Municipal Code (PM26-018) at the August 3, 2026, Regular Council meeting and directed staff to prepare an ordinance for first reading.

In summary, the approved changes are intended to streamline and “right size” the contractor licensing program to better fit the staff resources of the Building Department. Due to a significant increase in recent years in the number of contractors, especially from out-of-state, seeking Certificates of Qualifications (COQ) as an Apprentice or Journeyman, staff determined that it was no longer feasible to continue to require COQs for these two trade levels. In addition, managing the reciprocity program for out-of-state contractors was also consuming too much staff time and could be adequately replaced with a testing requirement and show of supporting work experience.

Analysis & Key Questions.

No additional analysis is necessary because no additional changes to the amendment were made since the Council approved the change on August 3, 2026.

Key Question #1

All key questions were asked and answered as part of the initial approval on August 3, 2026.

Possible Alternatives.

The Council has the option to:

1. Modify the ordinances attached to this staff report; or
2. Not approve the ordinances attached to this staff report.

Comprehensive Plan & Priority Alignment.

The proposed amendments align with the following the Comprehensive Plan goals:

- Policy 8.1.a: Maintain current, coordinated plans for delivery of desired service level. Approval of the requested changes will help ensure that the Building Department can continue to provide a high-level of customer service by removing unnecessary obligations and requirements within the contractor licensing program.
- Policy 8.1.c Innovate past barriers to service delivery goals: The requested changes are intended to find a creative solution to better match existing staff capacity with a rapidly changing and growing contractor labor market.

Fiscal Impact.

The removal of the Journeyman and Apprentice COQ requirements will result in the loss of revenue associated with those certifications. Staff estimate the loss to be approximately \$10,000 to \$15,000 annually.

Staff Impact.

The amount of staff time on this project is approximately 40 hours. In the long-term, the proposed amendments are expected to significantly reduce ongoing administrative workload associated with reviewing Certificates of Qualification and researching licensing equivalency among other jurisdictions. These efficiencies will allow Building Department staff to devote additional time to permitting, plan review, inspections, code enforcement, and customer service without requiring additional staffing resources.

Attachments or Links.

Redline of Ordinance F

Suggested Motion.

I move to approve Ordinance F on First Reading.

ORDINANCE F

AN ORDINANCE AMENDING CHAPTER 15.36, CONTRACTOR LICENSING, OF TITLE 15, BUILDINGS AND CONSTRUCTION, OF THE TOWN OF JACKSON MUNICIPAL CODE.

BE IT ORDAINED BY THE TOWN COUNCIL OF THE TOWN OF JACKSON, WYOMING:

SECTION I.

Section 15.36.020, Definitions, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.020 Definitions.

As used in this title:

~~Apprentice means an individual who is learning a trade under the direct Supervision of a person qualified under the terms of this chapter to train an individual in that trade.~~

Certificate of Qualification . . .

Contractor . . .

~~Journeyman means an individual who, through proven experience and demonstrated knowledge, shows proficiency in their trade. Such an individual shall be qualified to work for a Licensed Contractor without direct Supervision.~~

License . . .

Master . . .

Principal Place of Residence . . .

Supervision means the continuous control of all work in progress as authorized by the ~~Journeyman or~~ Master.

(Ord. ____ § I, 2026; Ord. 1380 § I, 2024).

SECTION II.

Section 15.36.031, License and certification required, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.031 License and certification required.

- A. It shall be unlawful for any person to undertake any of the types of work regulated by this Chapter within the Town without first obtaining ~~a~~any required License and/or Certificate of Qualification; in compliance~~ing~~ with the provisions of this Chapter.
- B. . . .

C. ...

(Ord. ____ § II, 2026; Ord. 1380 § I, 2024).

SECTION III.

Section 15.36.035, Applications—Initial and renewal, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.035 Applications—Initial and renewal.

A. ...

B. ...

C. ...

D. ...

E. Applications, whether for a License or a Certificate of Qualification, shall be processed within 30 days of the receipt of a ~~complete~~ application.

F. ...

G. Renewal of a Certificate of Qualification requires the applicant to either have i) completed ~~six eight~~ hours of educational seminar covering the adopted code for the applicable trade approved by the Building Official, or their designee, or ii) ~~provided a passed to~~ re-test through the ~~most current~~ ICC Trade Certification Program, ~~within 60 days of the renewal date~~.

(Ord. ____ § III, 2026; Ord. No. 1446, § I, 2025; Ord. 1380 § I, 2024).

SECTION IV.

Section 15.36.050, Certificates of Qualification, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.050 Certificates of Qualification.

A. ...

B. ...

C. *Reciprocity.*

1. ...

2. *Reciprocity with jurisdictions outside of Wyoming. ~~Reciprocity may be granted pursuant to 15.36.030. The Town of Jackson will not extend reciprocity to Licenses and Certificates granted by jurisdictions outside Wyoming.~~*

D. ...

E. *Classifications*. There shall be the following only classes of certification is a and the holder shall be authorized to do the following: 1. ~~Masters~~ Certificate of Qualification. A This Certificate of Qualification shall be required and shall permit the holder thereof to be supervisor or Master for each of the trades in which they have been certified.

2. ~~Journeyman Certificate of Qualification~~. A Certificate of Qualification shall be required in the trades described in this chapter and shall entitle the individual to work only in the trade for which they are certified and classified. Such certificates shall permit the individual to work only under the authority of a certified Master or supervisor.

3. ~~Apprentice Certificate of Qualification~~. A Certificate of Qualification shall serve as a registration with the Town. Such certificate shall entitle the Apprentice to work under the direct Supervision of a Journeyman or Master within each respective classification. With the exception of general, building, and residential Contractors, no individual Journeyman or Master shall have more than four Apprentices under their direct Supervision.

F. *Classifications Type of certifications—experience required*. An application shall may be filed in accordance with the time periods listed below unless otherwise approved by the Building Official or their designee. A person may not apply to upgrade their certificate to the next higher classification until they have met the experience requirement or equivalent, as approved by the Building Official or their designee. Up to 50 percent credit may be given toward the experience period set forth below at the discretion of the Building Official, or their designee, for relevant equivalent education in the construction field. The applicant is responsible for providing proof to verify such experience. Applicants that are unable to provide adequate and appropriate experience or time in service will be issued the next lower classification regardless of the exam they passed.

1. ...

2. ...

3. ...

4. ...

5. *Plumbing Certification*. Master applicants shall have eight years' experience, four of which are in a supervisory position. Apprentices shall be able to verify four years of working actively in a training program or for a qualified plumbing Contractor prior to applying to advance to the Journeyman level. Journeyman shall be able to verify four years of working actively in a training program or for a qualified plumbing Contractor prior to applying to advance to the Master level.

6. *HVAC Certification*. Master applicants shall have eight years' experience, four of which are in a supervisory position. Apprentices shall be able to verify four years of working actively in a training program or for a qualified HVAC Contractor as an Apprentice prior to applying to advance to the Journeyman level. Journeyman shall be able to verify four years of working actively in a training program or for a qualified HVAC Contractor as a Journeyman prior to applying to advance to the Master level.

7. ...

8. ...

9. ...

10. ...

(Ord. ____ § IV, 2026; Ord. 1380 § I, 2024).

SECTION V.

Section 15.36.060, Exemptions, of Title 15, Buildings and Construction, of the Code of the Town of Jackson, Wyoming is hereby amended as follows:

15.36.060 Exemptions.

A. . . .

1. . . .

2. . . .

3. . . .

4. . . .

~~5. *Individuals Under the Age of 18 Years Old.* Beginning on January 1, 2026, individuals under the age of 18 years old may work in the trades regulated by this Chapter without a Certificate of Qualification. Individuals must apply for and obtain the appropriate Certificate of Qualification card upon turning 18 years old and, after verification of work history, may be given up to 100 percent credit for the hours worked after January 1, 2026 while under the age of 18 years old.~~

(Ord. ____ § V, 2026; Ord. No. 1446, § IV, 10-20-2025).

SECTION VI

All ordinances and parts of ordinances in conflict with the provisions of this Ordinance are hereby repealed.

SECTION VII

If any section, subsection, sentence, clause, phrase, or portion of this ordinance is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such portion shall be deemed as a separate, distinct and independent provision and such holding shall not affect the validity of the remaining portions of the Ordinance.

SECTION VIII

The penalty for violating any provision of this Ordinance is up to a maximum of \$750.00 per day per violation.

SECTION IX

This Ordinance shall become effective upon its passage, approval, and publication.

PASSED 1ST READING THE _____ DAY OF _____ 2026.

PASSED 2ND READING THE _____ DAY OF _____ 2026.

PASSED AND APPROVED THE _____ DAY OF _____ 2026.

TOWN OF JACKSON

Arne O. Jorgensen, Mayor

ATTEST:

_____, Town Clerk

ATTESTATION OF TOWN CLERK

STATE OF WYOMING)

) ss.

COUNTY OF TETON)

I hereby certify that the foregoing Ordinance ____ was duly published in the Jackson Hole News and Guide, a newspaper of general circulation published in the Town of Jackson, Wyoming, on the ____ day of _____ 2026. I further certify that the foregoing Ordinance was duly recorded on page ____ of Book ____ of Ordinances of the Town of Jackson, Wyoming.

_____, Town Clerk

MEMORANDUM

TO: Mayor and Town Council

FR: Tyler Sinclair, Town Manager

DT: August 3, 2026

RE: Town Manager's Report

Temporary Sign Permits

The Temporary Sign Permit for Council consideration at this meeting is:

- ✓ Wyoming Untrapped requests to hang one temporary banner at 105 Buffalo Way (Albertson's) from August 16 – 29, 2026 to advertise the Beaver's & World Water Day (P26-136).

Staff recommends approval of this request and with the approval of the Town Manager's report, staff will issue the Temporary Sign Permit as requested.