



May 2, 2018

Re: Town Districts 3-6 Zoning Updates

Dear Mayor Muldoon and Town Councilors:

Thank you for the opportunity to comment on the Review Draft of Town District 3-6 land development regulations (Town LDRs). We appreciate all the work and time that you, your staff, and community members have invested in this important update, and your commitment to public engagement through Engage2017.

At the Jackson Hole Conservation Alliance, we believe that we have a responsibility to write land use rules that align with our Comprehensive Plan vision: a community with walkable neighborhoods surrounded by protected open space, working agricultural lands, and connected wildlife habitat; a community where at least two-thirds of our diverse workforce can affordably rent or purchase a safe and healthy home. In order to achieve this vision:

1. We support bold decisions to add a significant amount of workforce housing potential in Town, to prevent sprawl into open space and wildlife habitat.

This is a once-in-a-generation opportunity to shape our future by locating growth where it belongs. Developers are constantly pushing to upzone, annex, and build on important open space and wildlife habitat. Recently, the County Planning Commission asked for an accelerated upzone of Northern South Park and Hog Island. We hear the argument that if there isn't political will to locate additional workforce housing in Town, then large open spaces are the "escape valve." To deflate this argument, please be bold: build more densely within our existing footprint, especially Town – thus becoming a national model of a strong community living in balance with nature.

We support the proposal to add density through incentives, not in base zoning. This way, the community maintains flexibility as needs change. Right now, we need to incentivize workforce housing, but perhaps in a decade we'll need to incentivize small business space or conservation (such as through a policy to transfer development potential from rural areas into Town).

2. Please change parking regulations to encourage workforce housing development.

We understand that parking is a key constraint on building workforce housing in Town – both for private market and public-sector builders, and for potential use of the "fill the box" incentive. One solution is to allow year-round on-street parking. While it would complicate snow plowing, "alternate side parking" works in other snowy communities and could lift a major obstacle to workforce housing production. Please be bold and consider winter on-street parking – and other creative and flexible parking policies – as part of these updates.

3. Please increase natural resource protections and community amenities.

Much opposition to increased density in Town comes from our shared values of protecting our wildlife, natural resources, and neighborhood quality, and from the feeling that added density will harm these values. It doesn't have to be this way. To address these fears, please package increased density with increased natural resource protections and increased community amenities in impacted neighborhoods.

Protecting the wildlife, wild places, and community character of Jackson Hole.

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→ **Please update the Town Natural Resource Protection LDRs in 2019**

We should be updating our Town Natural Resource Protection LDRs *in conjunction with* Town Zoning – to give our community the confidence that even as we add density, we'll be protecting our cherished wildlife, water quality, and quality of life. At the least, we should commit to strengthening the Natural Resource Protections as soon as possible.

→ **Please ask neighborhoods what amenities could balance growth**

Once we have identified how much density each District should expect, the Town should ask the neighbors in that District what kind of public investments could make that change palatable – sidewalks, neighborhood bodegas, park or pathway improvements, shared parking – and then build those investments into our Capital Improvement Plan.

4. Please base Town LDRs on transparent numbers, data, and market analysis.

The District 3-6 FAQs repeatedly reference “1,800 units” as a maximum number of new units added through this rezone. Please share the analysis behind this forecast. Specifically:

- Given market realities, existing development on the ground, and the best available data, how many of those units should we expect to *actually* be built in the next 20 or 50 years – overall and by neighborhood?
- How many of those units will be deed-restricted to our local workers, and how many are unrestricted and able to “leak” to second homes, vacation rentals, etc?

These are the important big-picture questions. Lacking them, we're just looking at maps and technical codes. Please share clear and detailed analysis before bringing this update to a vote.

5. Please deed-restrict density increases for our workforce.

The District 3-6 FAQs state very clearly: “The only purpose for adding any portion of the 1,800 units is to provide workforce housing for local workers.” But the proposed tool is a 2-to-1 *market-to-workforce* housing bonus, which could result in significantly more *market-rate* housing. The 2-to-1 tool was created for Downtown District 2, where we expected needing major incentives to get workforce housing built. Now we're in the residential area, so instead of just re-using the same downtown tool, please run and share real market analysis to find the optimal level of market/workforce incentive in these zones.

Please be in touch with any questions, and again, thank you for your commitment to our community character.

Sincerely,



Skye Schell

Executive Director

Jackson Hole Conservation Alliance