

June 21, 2017

**Re: Special Town Council Meeting for Districts 3-6 and Parking Study**

Dear Mayor Muldoon and Town Councilors:

Thank you for the opportunity to comment on the proposed Town District 3-6 land development regulations (Town LDRs) and Parking Study.

The Jackson Hole Conservation Alliance (Alliance) believes that we have a responsibility to write land use rules that align with our community's vision as articulated in our Comprehensive Plan. This is a vision of 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 that meets their family's needs.

We are encouraged by the title of your planning process: "Ensuring Local Wildlife & Workforce." This accurately reflects the Comprehensive Plan goals as well as our vision for the community. Many of our members participated in your recent Open House and survey, and you have already received their feedback. Now, we wish to share a few policy recommendations as you review the feedback and chart a course toward implementation.

**First, please lay out a clear strategy on how to increase workforce housing in complete neighborhoods while protecting wildlife and natural resources.**

We recognize that you are working on parking, natural resources, and housing mitigation in parallel, and ask that you maintain a "big picture" view to connect these processes with your overall goals of ecosystem protection and housing 65% of our workforce. Please start with clear goals (e.g. "adding 500 units of workforce housing into Town Districts") and then identify how these planning processes will achieve those goals.

**We recommend integrating market analysis with the zoning work** so that you can forecast roughly how many units are likely to be built under new zoning – and so you can see if that meets your goals in the Housing Action Plan and Housing Supply Program. This should also include analysis of how creative parking policies can make it easier for developers to build homes that people who work here can afford.

**Please zone enough residential land** in appropriate complete neighborhood locations and densities to achieve our Comprehensive Plan goal of housing at least 65% of the workforce locally. This means zoning land throughout Districts 3-6 for housing of diverse types: condos, apartments, "micro-units," dormitories like the Powderhorn development, and accessory resident units (ARUs). **It could also mean rezoning commercial land into residential land**, with sufficient incentives to appeal to landowners (e.g. increased density). **Any significant upzones should come with workforce housing restrictions:** we don't need more market-rate development that will "leak" out of the workforce over time. We need more housing for people who work here, so we can continue to be a strong community.

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

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**Next, please consider implementing neighborhood-planning processes** for complete neighborhoods that both identify the amount and type of growth expected in each neighborhood and engage neighbors in shaping how that growth will occur. That is, once you have identified how much density each District needs in order to meet our housing goals, work with the neighbors in that District to learn what kind of public investments could make that density successful: sidewalks, neighborhood bodegas, park or pathway improvements, shared parking – and build those investments into your Capital Improvement Plan.

**Please consider creative policies** to more efficiently accommodate housing development in complete neighborhoods like minimum density requirements; bonus density allowances for mixed-use housing developments, participating in a transfer of development rights (TDR) type program, or underground parking; reduced on-site parking requirements; and fee waivers for new ARUs. Please also consider a suite of parking policies such as paid parking downtown and residential parking permits in the District 3-6 neighborhoods, so that new housing development and associated vehicle storage can be gracefully accommodated without undue impact to neighbors.

**In parallel, please strengthen the housing mitigation requirements** for new commercial and lodging development so that development mitigates its impact on our housing challenge. Additionally, please consider switching from basing mitigation only on square footage of new development to a different system where employers mitigate based on number of employees. This is a separate topic but should be analyzed in tandem with Districts 3-6, to ensure we have a realistic plan to meet our housing goal.

Please be in touch with any questions, and again, we thank you for your commitment to our wildlife and workforce.

Sincerely,

Skye Schell  
Civic Engagement Director  
Jackson Hole Conservation Alliance