

To: Board of County Commissioners and Jackson Town Council
 From: Craig M. Benjamin, Executive Director, Jackson Hole Conservation Alliance
 Date: July 30, 2015
 RE: Additional Alliance Comments on the draft 2015 Annual Indicator Report

Thank you for the opportunity to provide additional comments on the draft 2015 Annual Indicator Report. We greatly appreciate staff's hard work in the July 28, 2015 staff report to explain the methodology that led to the errors in the data behind the 2009 Build Out Analysis and their recommendations for resolving these errors.

While it's easy to get lost in a morass of numbers, an alphabet soup of acronyms, and disagreements over intent, it's important that we all take a deep breath, step back, and boil down this whole buildout brouhaha to it's essence. At it's core, this entire conversation is about what type of community we want to be and how we can craft land use rules that will help us become this community.

The 2012 Jackson / Teton Comprehensive Plan provides our vision of the type of community we want to be and the high-level policies that will help us achieve this vision. We fundamentally agree with the vision of the Comprehensive Plan, which states, "preserving and protecting the area's ecosystem is the core of our Vision and all aspects of our community character, our Vision cannot be achieved with a singular focus." As staff point out, a number of policies are relevant to this discussion:

Policy	Content	Relevance
5.1.a	Establishes community goal to house at least 65% of the workforce locally.	The draft Indicator Report notes we are currently failing to achieve this goal.
6.3.e	"Implementing the 'better, not bigger' economic development strategy the community desires will require a balance of all nonresidential uses, as well as a balance between jobs and housing. Active monitoring of existing and new nonresidential development will ensure we achieve this balance."... "The community will use the results to maintain an appropriate equilibrium between all uses."	This policy does not state residential and nonresidential uses will grow proportionately at a one-to-one ratio, but rather in <i>equilibrium</i> .
9.1.c	Ensure growth occurs to enhance character, "[N]ot only encourage the appropriate type of residential development, but also address concerns about the amount of nonresidential growth by indicating the balance between employee generation and residential development." ... "65% has been determined to be the community character tipping point in other Rocky Mountain resort communities."	We have passed the tipping point and are already significantly out of balance. We all know we must dramatically increase housing affordable to people who work here to get back in equilibrium.

There's no question that we're out of balance now – too much commercial compared to housing. As indicated in the draft 2015 Annual Indicator Report on page 21, "workforce housing is not being provided in balance with the jobs that are being created," and "the ratio of local workforce to local jobs has declined steadily over the past 10 years." 11-year Valley resident Matt Grabowski put a personal touch on these numbers in a piece in this week's Planet Jackson Hole featuring people impacted by the Blair Place rent increases when he explained, "It feels more and more like working class people are not welcome here anymore."

In order to stay a strong community where at least 65% of people who work here can afford to live here, staff's Housing Summit materials estimated that our community needs to produce 280 units of housing affordable to people who work here a year for the next ten years. Of these 280 units, 30 result from catching-up from our current deficit, 50 are the result of the pending retirement of the baby-boomers, and 200 are the result of employment growth. We know we can't build 280 new housing units every year – so what are our other policy options?

Simply put, the easiest and least costly thing we can do to deal with our housing challenge is to limit new commercial and lodging development, while the absolute worst thing we could do would be to dramatically increase commercial and lodging development potential. In fact, given the current extraordinary imbalance between housing and jobs, our community should actively explore shifting nonresidential development potential toward residential in strategic locations.

Given our shared commitment to forward progress in the implementation of the Jackson/Teton County Comprehensive Plan through the updates to the LDRs, staff's thorough explanation of the methodology that lead to the errors in the data behind the 2009 Build Out Analysis, and the vision and policies articulated clearly in the Comprehensive Plan (including Policy 3.1.a: Limit development potential to protect community character which plainly states, "the amount of growth should be limited to the amount allowed and planned for since 1994"), *we respectfully request that you direct staff to clarify in the Indicator Report and other staff reports (such as for the District 2 LDRs) that our "additional" nonresidential development potential is zero.*

In addition, as the Indicator Report is a measure of progress on benchmarks of Comprehensive Plan implementation, not a vehicle for changing Comprehensive Plan policy, *we also respectfully request that you direct staff to amend Appendix B of the Comprehensive Plan with corrected buildout numbers.*

Thank you for your hard work advancing the vision and values of our community.

Craig M. Benjamin

Executive Director
Jackson Hole Conservation Alliance

Cc: Alex Norton, Long Range Planner, and Tyler Sinclair, Planning Director