

March 18, 2016

Town of Jackson Planning and Zoning Commission

RE: March 5, 2016 Revised Adoption Draft for Character District 2: Downtown LDRs

Dear Town Planning and Zoning Commissioners:

Thank you for the opportunity to comment on the proposed District 2 Land Development Regulations (LDRs).

The Alliance believes 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.

For this reason, it is gratifying to see the March 5, 2016 Revised Adoption Draft for Character District 2: Downtown LDRs (Adoption Draft). Staff has done an excellent job of representing the direction of the Town Council in this Adoption Draft, and it is a significant improvement over previous drafts. The Adoption Draft moves us toward implementation of the 2012 Jackson/Teton County Comprehensive Plan on key issues that can be positively affected with these new District 2 regulations, including: housing 65% of our workforce locally and Town as the Heart - maintaining town as the central Complete Neighborhood where people live, work and play. Please move it forward with your recommendation for Town Council adoption, considering the following points:

Our community doesn't need millions of square feet of new commercial and lodging development potential. There are over 2 million square feet of existing commercial and lodging development potential in District 2, and independent and staff market analysis show our community won't need more for at least two decades into the future. It's simply unnecessary and not aligned with our Comprehensive Plan to propose (as previous drafts did) zoning changes that won't provide anywhere near enough housing affordable to people who work here while encouraging a dramatic expansion of commercial development, lodging, short-term rentals, and higher-end condos (i.e. second homes), generating new low-wage jobs, staffed by new low-wage employees, who need new affordable places to live.

The Adoption Draft rightly maintains the lodging overlay boundary, where lodging and short-term rentals are allowed, where it is today. This implements our Comprehensive Plan by not further exacerbating our jobs/housing imbalance. And it is fair, as it does not create new winners and losers among property owners.

Finally, the Adoption Draft sets up a structure to incentivize workforce housing development. We are concerned that this structure does not provide *enough* incentive. We recommend further in-depth market analysis to determine what incentives would actually be effective in encouraging robust Town as Heart revitalization through building housing affordable to people who work here in our downtown core. We also recommend the Town and County jointly hire a consultant to perform market analysis and code-writing for a "conservation incentive program"

that would allow increased development in the downtown core in exchange for supporting conservation in preservation areas.

Please take action to recommend the adoption of the March 5, 2016 Revised Adoption Draft for Character District 2: Downtown LDRs, and please ask for additional work (especially market analysis) for a robust workforce housing and conservation incentive program.

We acknowledge you and your staff for all your hard work on District 2 regulations. We thank you for your many hours of work and dedication serving on the Planning Commission implementing our community's vision.

Please let us know how we can help with this process moving forward.

Sincerely,



Mary W. Gibson
Community Planning Director
Jackson Hole Conservation Alliance