

April 15, 2016

RE: P15-004 District 2: Commercial Core LDRs text amendment; P15-005 District 2: Commercial Core LDRs Official Zoning Map Amendment

Dear Mayor Flitner and members of the Town Council,

Thank you for the opportunity to comment on the Staff Analysis of April 11, 2016, of 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 Staff Analysis. Staff has done an excellent job of representing the direction of the Town Council in this work. **We support the Staff Analysis and the proposed District 2 LDRs and recommend you adopt this package in a timely manner.**

Because of your direction, these revised District 2 regulations and map move us toward implementation of the 2012 Jackson/Teton County Comprehensive Plan on key issues 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.

Encourage workforce housing

The March 4, 2016, revised draft of District 2 LDRs, together with the workforce housing incentive modifications as presented by staff, may encourage more workforce housing in District 2. Although some critics have repeatedly said that "you won't ever get housing downtown," we believe that a well-designed incentive program could attract workforce housing development into this district, which is the best place for non auto-dependent workforce housing, as people can live where they work and play.

Town as Heart

We share the vision of "Town as Heart," and we see the largest untapped opportunity to achieve this vision is through the addition of housing so more people can live and work downtown. Downtown residents would round out the calendar and clock of activity on our downtown streets, patronize our businesses, provide a boost to the downtown business economy, and increased demand for commercial services. This, along with strategic policies that encourage appropriate commercial redevelopment downtown within existing entitlements, would precipitate commercial growth in our downtown core, making it the most vibrant 24/7 complete neighborhood and robust

economic district in our region. This synergy will revitalize downtown and in turn, increase the tax base through rising property values and sales tax revenue. This formula has proven to be effective time and again in downtowns across the nation.

No major commercial and lodging upzone

According to the Comprehensive Plan, “Community character will be preserved by limiting overall development in the community to the amount that has been allowed and planned for since 1994. By not increasing the amount of potential development beyond this level, and better locating and designing development that does occur, we can decrease our impacts to the ecosystem while respecting property rights and preserving our rural character” (Policy 3.2.a.).

As staff mentioned in a previous report, based on facts and data, “Everyone appears to agree that there will not be demand for additional nonresidential potential in the next 20 years above and beyond the amount allowed by the ‘1994’ (current) land development regulations.” The March 4, 2016, revised draft of the District 2 LDRs and revised Zoning Map of District 2 and the Lodging Overlay, align with Town Council and County Commission direction not to exceed the existing 2.2 million sq. ft. of commercial and lodging potential already allowed per our Comprehensive Plan. Rather, they allow for commercial expansion at the levels already provided for, which total over 5 million sq. ft. for Town and County. This positive revision better implements our 2012 Jackson/Teton County Comprehensive Plan. It does not further exacerbate our jobs/housing imbalance by adding more commercial and lodging development potential that the facts and data show we won’t need for at least two decades.

Maintain the current Lodging Overlay boundaries

The March 4, 2016, revised Zoning Map of District 2 also maintains the lodging overlay boundary, designating where lodging and short-term rentals are allowed, to what it is today. This also 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. Please maintain the existing Lodging Overlay boundary.

Conclusions

We support the package as it stands and recommend you act in the affirmative on the Suggested Motions to:

Approve P15-004, the District 2: Commercial Core amendments to the text of Town of Jackson Land development Regulations dated March 4, 2016, and direct staff to prepare ordinance(s) for first reading subject to the modifications listed under suggested motions, and Approve P15-005, the District 2: Commercial Core amendments to Official Zoning Map dated March 4, 2016.

We applaud you for your leadership and vision implementing our Comprehensive Plan through District 2 and thank your staff for all their hard work on District 2 revisions.

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

Sincerely,



Mary W. Gibson
Community Planning Director
Jackson Hole Conservation Alliance