



January 27, 2015

Town of Jackson Planning and Zoning Commission

Via e-mail

RE: DOWNTOWN DISTRICT 2 LDR'S

Dear Planning and Zoning Commissioners:

We thank you for the opportunity to provide additional comments on the proposed District 2 LDRs. Our previous comments were focused primarily on the provisions for housing, as we were disappointed to learn that very little, if any, workforce housing would likely result under the proposed District 2 LDRs.

The comp plan states our community's goal to, "Ensure a variety of workforce housing opportunities exist so that at least 65% of those employed locally also live locally."

The comp plan implementation document "Illustration of Our Vision" states regarding District 2: *"The future goal is to create a vibrant pedestrian-oriented mixed use district with a variety of non-residential and residential uses. A key component of achieving this goal will be to have visitors and residents visit the area more often and stay longer by increasing the availability of lodging and residential units and creating a vibrant Retail Shopping District."*

Policy Objectives quoted which apply to District 2, from Common Value 2: Growth Management: 4.1.b: *Emphasize a variety of housing types, including deed-restricted housing;* and Common Value 3: 5.2.d: *Encourage deed-restricted rental units.*

We understand Jackson market realities make the provision of workforce housing challenging in District 2 and acknowledge not all the tools for workforce housing solutions reside in the land use regulatory toolbox. Here's the thing, we must do all we can now, as we implement the comp plan, to pave the way for workforce housing by removing regulatory obstacles and providing regulatory incentives for its provision. We simply cannot afford to skip a district. We must try harder.

This should start with a discovery of what it takes to get workforce housing development in District 2. Function should drive our standards and permitted uses. In order to achieve our comp plan goals we should be answering the questions: **How much workforce housing do we need, now and into the future, where should it be located and what must we do in our regulations to gain workforce housing?**

Despite our concerns with how the proposed District 2 LDRs do not adequately address and potentially exacerbate our workforce housing crisis, we appreciate the detailed and thorough design standards which have been developed for District 2 and think they will serve our community well.

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As to the proposed increases in commercial development, we do not see an adequate justification or need for the amount of commercial square footage proposed in D2. It's unclear how the proposed increase would advance our community's goals as articulated in the comp plan.

Regarding the lodging overlay, harkening back to the "2013 Effective Population of Teton County" study the Alliance provided for the Town and County, this study shows that there is considerably more room capacity than heads in beds for all but two weeks of the year, with lodging only reaching capacity during the peak of summer. Similar to our concerns regarding the proposed increase in commercial development, it's unclear why we should plan for increased lodging use when it does not appear to align with our community's goals, and may in fact stand in direct opposition.

As explained in the staff report, anywhere the lodging overlay is extended, that area is lost to accommodating workforce housing. As there is a large identified unmet need for workforce housing, while there is no need identified for additional lodging, we recommend against any expansion of the lodging overlay and encourage you to consider shrinking it if appropriate in order to facilitate the provision of workforce housing.

While we understand the desire for some newer lodging in town, it's development should be encouraged in carefully located locations within the lodging overlay where it will not discourage housing development, and well away from key natural assets, such as Flat Creek. In addition, the 5-way intersection is in need of wildlife-vehicle collision mitigation due to the dozens of mule deer hit in that vicinity every year. The plan for this mitigation should come before zoning changes that would add development pressure and potentially preclude cost-effective options for keeping people and wildlife safe on our roads.

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