

October 9, 2017

Re: Increasing Commercial and Other Mitigation

Dear Mayor Muldoon, Town Councilors, and County Commissioners:

Thank you for the opportunity to comment on the housing mitigation policy questions in your Engage2017 planning and zoning project.

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; and a community where at least 65% of our diverse workforce can affordably rent or purchase a safe and healthy home that meets their family's needs. We believe that a critical component of protecting our community character is ensuring that hard-working families can live here so that we still have neighbors active in our civic life: from serving on parent-teacher associations, voting, and volunteering with Fire/EMS to leading outdoor trips and coaching youth sports.

As a conservation organization, we will defer to other local organizations with expertise in *how* best to implement housing mitigation policy, and we do not have any comments on your "Housing Rules & Regulations" topic. However, we can offer high-level comments about how housing mitigation relates to conservation and our community.

Commercial and job growth is a key part of the bigger picture of regional population growth that could unravel our area's ecosystem, outlined well by journalist Todd Wilkinson in his recent article "Unnatural Disaster: Will America's Most Iconic Wild Ecosystem Be Lost To A Tidal Wave Of People?" (<http://mountainjournal.org/the-wildest-ecosystem-in-america-faces-death-by-too-many-people>). **Locally, we must ask how any policy helps "protect and preserve the area's ecosystem"** – and how it meets our Comprehensive Plan goals for community character and quality of life.

Our responsibility to mitigate the impact of new growth and development on our wildlife, wild places, and community should be clear. Housing mitigation rates are a critical tool to mitigate the impacts of growth on our workforce and thus community. **We should also enact parallel tools to mitigate impacts on our wildlife and our natural resources**, such as the forthcoming new natural resource protections, or a parallel "natural resource and wildlife impact generation by use" nexus study and mitigation.

The Housing Action Plan showed that job growth is a major cause of our workforce housing challenges: your staff estimated a need of 200 units per year to keep up with projected employment growth vs. only 80 units per year to catch up with our existing shortage (a shortage that is decades in the making). **As a result, we should increase the amount of mitigation on both commercial and residential development.** Commercial mitigation should include year-round and seasonal workers, and rates should be increased so that we actually "keep up" with our goals.

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

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In response to your policy questions:

- 1: B: We should mitigate for all job growth, as it all impacts the community
- 2: A: All of the workforce that can't afford housing here should be included in mitigation
- 3/4/5: *Unsure.* We defer to housing experts on *how* to impose the mitigation requirement, as long as it actually achieves housing 65% of our workforce, so we don't keep digging the hole deeper. This likely means increasing rates (certainly not decreasing).
- 6: *No comments.*
- 7: C: New development, including mitigation, should be focused into areas identified for development – specifically, in our Complete Neighborhoods.
- 8: A: No development should be exempt, unless it is actually not creating an impact – but this should be rigorously studied.
- 9: A: No “relief” should be allowed unless it is legally required
- 10: B: Outdated plans and projects should be updated, if legally allowed, to include our new standards so that there is a level playing field for all new development.

Overall, it is clear from our current imbalance of jobs and housing that we need to increase mitigation rates on commercial and market-rate residential development.

Finally, as we have previously written, we encourage you to consider switching from basing mitigation only on square footage of *new development* to a different system where *all commercial employers* mitigate based on their number of employees every year – if such a system could be created within our state's legal framework.

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

Sincerely,

Skye Schell
Executive Director
Jackson Hole Conservation Alliance