



February 25, 2010

Board of County Commissioners

Re: March 2 Hearing - Amendment to Eliminate the Ability To Rezone to PUD-AH and PUD-PR  
& Amendment to Add Section 2551 regarding Employee and Affordable Housing

Submitted via email

Dear Commissioners,

On behalf of the Jackson Hole Conservation Alliance, following are comments specific to the PUD-AH and PUD-PR text amendment you will be discussing at the March 2 hearing.

First, **we fully support the intent of this amendment to eliminate the ability to rezone to the county's most unpredictable zoning districts, the PUD-AH and the PUD-PR, and appreciate the efforts on the part of staff to bring it forward.** Throughout the years of the comprehensive planning process, the public has made it clear they no longer support unpredictable planning tools. **We strongly encourage you to repeal these sections of the land development regulations** - with the understanding that existing developments would still be considered under the land development regulations under which they were approved (as explained by Jim Radda in a correspondence to planning staff.)

However, **we have concerns with regard to the addition of Section 2551, "Increased densities with the PUD District for Planned Resort limited to affordable housing and employee housing."** First, we have concerns regarding the purpose and need for this type of amendment to be made at this stage in the comprehensive planning process. The joint planning commissions have been taking considerable time to discuss the conditions under which future additional increases in density would be permitted, and in what locations these increases are appropriate. Given the extensive amount of development already approved and yet to be built in resort areas, the urgency for an amendment at this time (particularly for one that contradicts much of the current discussions about future development) is questionable.

Second, this amendment would allow for unlimited density to be requested in any of the resort districts (all of which have different challenges and contexts to consider in terms of appropriate density.) We are concerned that the amendment language is so abbreviated that it doesn't provide any guidance about what scale of density is appropriate to request. This would therefore make for a difficult application, and review, process - not something that is good for the applicant, the public, or decisionmakers.

Third, while we appreciate the intent to get more workers close to the workplace in these resorts, the brevity of the amendment doesn't provide assurances that this housing would be permitted only for the workforce within those areas, or provide guidance about the preferred types of affordable housing (rental versus ownership).

Fourth, we are concerned about the language that proposed increased densities must "pertain" to affordable housing. While planning staff clarified that the intent of the amendment is only to allow for projects that are 100% affordable or employee housing, which we appreciate, we believe that the word "pertain" doesn't go far enough to clearly point out that all units must be restricted to this purpose.

Fifth, the review processes for resort master plans have taken considerable time and effort on the part of all involved for many years. To add such an open-ended text amendment, with no clear guidance for appropriate levels of density, and the preferred types of affordable housing, is not appropriate.

**While we do not recommend that you move forward with the addition of Section 2551 at this time, in the event that you do, we believe that additional language should be added that more clearly specifies conditions and requirements for requesting additional density for employee and affordable housing.**

Thank you for your consideration of these comments.

Sincerely,

Kristy Bruner  
Community Planning Director