

Jackson Town Council Workshop

June 21, 2022

1:30 PM

Town Council Chambers

NOTICE: THE VIDEO AND AUDIO FOR THIS MEETING ARE STREAMED TO THE PUBLIC VIA THE INTERNET AND MOBILE DEVICES WITH VIEWS THAT ENCOMPASS ALL AREAS, PARTICIPANTS AND AUDIENCE MEMBERS. **PLEASE SILENCE ALL ELECTRONIC DEVICES DURING THE MEETING**

I. ZOOM LINK FOR PUBLIC PARTICIPATION

To join, click the link or copy to your browser: <https://us02web.zoom.us/j/86242613337?pwd=Z1U2b2pJbmxsV2VJbUUrQkx5WEtpZz09>
If the link does not work, join at zoom.com with Webinar ID **862 4261 3337** Password: **83001**
or join by phone **+1 253 215 8782** with Webinar ID **862 4261 3337** and Password: **83001**

II. CALL TO ORDER AND ROLL CALL

III. WORKSHOP ITEMS

- A. Director Updates (Housing, Finance, 20 mins)
- B. Budget Discussion (Larry Pardee & Kelly Thompson, 45 min)
- C. Residential and Short Term Rental Definitions and Requirements (Tyler Sinclair, 120 min)
- D. Naming Public Place Policy (Lea Colasuonno, 45 min)

IV. PROPOSED ITEMS FOR FUTURE WORKSHOPS

- 7/18 - Director Updates (Parks & Rec, Community Development)
- 7/18 - Title 2 Personnel (Lea Colasuonno)
- 7/18 - Lodging and Short Term Rentals (Tyler Sinclair)
- 8/15 - WWTP Technical Review Project Update (Floren Poliseo)
- 9/19 - Special Events Traffic Control Device Rentals (Floren Poliseo)

V. EXECUTIVE SESSION

Recess or Adjourn to executive session to discuss personnel matters in accordance with Wyoming Statute 16-4-405(a)(ii).

Please note that at any point during the meeting, the Mayor and Council may change the order of items listed on this agenda. In order to ensure that you are present at the time your item of interest is discussed, please join the meeting at the beginning to hear any changes to the schedule or agenda.

STAFF REPORT



Meeting Date:	June 21 st , 2022	Meeting Title:	Special Workshop
Submitting Department:	Administration	Presenter:	Larry Pardee, Kelly Thompson
Agenda Item:	FY2023 Budget Discussion	Public Comment:	Yes

Purpose & Policy Considerations.

The Town Council reviews and approves the recommended budget pursuant to Wyoming Statute. The recommended FY23 budget reflects the Council's priorities for the coming year. The purpose of this meeting is to discuss and recommend changes to the draft FY2023 budget before consideration of adoption at this evening's Regular meeting.

Requested Action.

To continue discussions on draft FY2023 budget and should Council choose to direct staff to make recommended changes to the draft FY2023 budget, staff will request Council make motion(s) for each item identified and they will be incorporated into the budget adoption resolution on the agenda for the regular June 21, 2022 Council meeting.

Recommendations.

To finalize Council review and discussion of the FY2023 Recommended Budget.

Background.

The message guiding this year's budget is:

"Investing in public services and supporting Jackson's quality of life and community character while providing for a stable future".

The goals of the recommended budget are to first fund core municipal program services, and secondly to direct needed surplus funds to capital projects affected by historically high construction costs, complete a thorough assessment of the Town's compensation structures to recruit and retain quality employees, and to continue to support community priorities that help maintain our cohesive, vibrant community.

Jackson has seen a lot of change in the past decade and the pace of change has picked up in recent years, but our community remains, and the Town intends to continue to support and invest in our community while working to ensure a stable future. We have updated and adjusted our revenue projections to 8% based on additional information received from local, regional, and this month's sales, use and lodging tax collections. The pandemic and its aftermath challenged the Town to find creative ways to meet our community's needs. As COVID-19 continues to loosen its grip, supporting our core services is key as we invest in 21st century infrastructure, bolster what we do best as a Town and community, and work to ensure we can recruit and retain a quality workforce for years to come. The FY23 recommended budget presents a balanced, and sustainable plan to utilize our financial resources to maintain our quality community services and lead toward a stable future.

The last year was filled with a succession of peaks and valleys as we continued to navigate the pandemic and resulting challenges with supply chains issues, labor shortages, and unprecedented spikes in building materials. We collected record amounts of sales tax, but simultaneously dealt with staffing shortages and rising inflation.

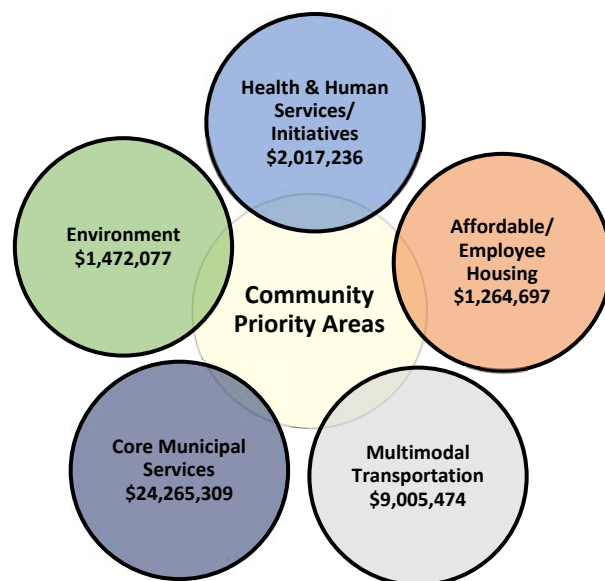
The goals of the recommended budget are to:

1. Fund core municipal program services,
2. Direct needed surplus funds to capital projects affected by historically high construction costs,
3. Complete a thorough assessment of the Town's compensation structures to recruit and retain quality employees, and
4. To continue to support community priorities that help maintain our cohesive, vibrant community.

The recommended FY23 budget is focused on revenues and expenditures in five Community Priority areas including Core Services, the Environment, Health & Human Services, Multimodal Transportation, and Affordable and Employee Housing. This Community Priority Framework presents a direct, transparent guide for Council and the community to understand the budget and quickly identify where the Town invests its resources.

Council should review the recommended Town of Jackson FY23 Budget Book and familiarize yourself with as many specific sections of the budget you are interested in delving into and discussing. Through Council's review process, we want to ensure that the budget reflects Council's priorities and values on behalf of the community for fiscal year 2023.

Further details behind the budget message and details about goals and direction can be found in the Town Manager's letter at the start of the Budget book.



Analysis

Agenda: Tuesday June 21st, 2022.

1. START Federal Funding and Level of Service Changes – 15 mins
2. Joint Department – Final County Adjustments - 15 min
3. Discussion Items and Change Log to Date - 15 mins

START Federal Funding and Level of Service (LOS) Changes:

Wyoming Department of Transportation (WYDOT) notified START on June 6, 2022, that the FY2023, 5311 operating grant would be \$4,742,333. The draft recommended budget contained a grant figure of \$3,150,000. Staff informed Council and Commissioners during our budget meetings should additional Federal funding be awarded we would work to add back level of services the START Board recommended. These additions include:

- On-Demand South Town service.
- Improved frequency on the Teton Village (TV) local route in summer and winter.
- Night service on the TV Local route in summer.
- Improved frequency on the TV South route in the winter.

This increase in federal funding will reduce local contributions from all local entities: Town, County, Jackson Hole Mountain Resort, and Teton Village Association.

These additions will aid in implementing the START Route Plan and Integrated Transportation Plan. We are committed to providing increased levels of service, while noting labor shortage continues to be a challenge, staff will hire as many qualified applicants as possible and also will look to subcontract out these services, should permanent staffing not be available. Staff will discuss these changes for final budget adjustment.

Note: this is more federal funding than START has ever received. Historically, we received around \$2M pre-pandemic. Staff wants Council to be aware that should federal funds return to prior levels, reductions in level of service or increased contribution from Town/County will be our two options.

Joint Departments:

Teton County approved a final wage adjustment for FY2023 of 6% plus a \$1,200 one-time bonus. Estimated fiscal impact for this County impact is as follows:

- Fire/EMS increase \$112,197

- Parks and Recreation increased \$116,638
- Dispatch increased \$45,498
- Pathways increased \$4,125
- Affordable Housing increased \$22,112

The Town's draft budget includes a 3% wage adjustment. Staff will discuss County adjustments and potential Town wage adjustments.

Possible Alternatives.

None at this time.

Comprehensive Plan & Priority Alignment.

To successfully implement the Comprehensive Plan, Council must set priorities, be strategic, and be disciplined. A critical component is prioritizing and identifying the necessary level of funding to address desired goals, policies, and strategies, which is all critical to the successful implementation of Town Priorities and the Comprehensive Plan. In addition, many of the programs and strategies called for in the Comprehensive Plan come at an additional cost to the community that current funding levels cannot accommodate. Chapter 8 - Quality Community Service Provision calls for *"Timely, efficient and safe delivery of quality services and facilities in a fiscally responsible and coordinated manner."*

Fiscal Impact.

None at this time.

Staff Impact.

The staff impact of preparing this information is estimated at about 800 primary staff and 1500 organization wide for all department members participating in preparing budget requests and internal staff meetings. Also, extensive, and ongoing staff time is spent in preparing, reviewing, and adjusting the recommended budget.

Attachments or Links.

Town of Jackson FY23 Budget Book – Please find a copy at Town of Jackson website

Suggested Motion.

Motion to direct staff to increase funding for budget item _____ in the amount of \$ _____

Motion to direct staff to decrease funding for budget item _____ in the amount of \$ _____

Motion to direct staff to add a new item _____ for \$ _____ not in the current draft FY2023 budget.

I move to direct staff to make the changes as noted and incorporate those changes into the budget adoption resolution for the FY23 budget on the regular evening agenda for Tuesday June 21st, 2022.

STAFF REPORT



Meeting Date:	June 21, 2022	Meeting Title:	Special Workshop
Submitting Department:	Community Development	Presenter:	Tyler Sinclair
Agenda Item:	SUBJECT: ITEM P21-333: Request for a Land Development Regulation (LDR) Text Amendment to Section 6.1.4 Residential Uses and Section 6.1.5 Lodging Uses to amend definitions regarding occupancy limits	Public Comment:	Yes

Purpose & Policy Considerations.

For Town Council to provide direction on LDR Text and Municipal Code Amendments regarding definitions and requirements regarding occupancy limits for long term residential and short-term rental units.

Requested Action.

As directed by the Town Council the Community Development Department has drafted an LDR Text Amendment to:

1. Amend LDR Section 6.1.4.A.1 Definition as follows:

*Definition. A residential use is a living facility, certified under the International Residential or Building Code or by HUD, that includes permanent provision for **long term permanent** living, sleeping, eating, cooking, and sanitation **and not for short term transient lodging or short-term rental use.***

2. Amend LDR Section 6.1.4.A.2 Standards [Standards for Residential Uses] as follows:

~~*a. No residential unit or portion of a residential unit may be rented such that occupancy by the lessee is limited to less than **90 consecutive 31 days**. Occupancy shall mean the duration of time that a lessee resides, or intends to reside, within the leased premises. Rental of less than **90 31 consecutive days** shall be considered a lodging use subject to the standards of Sec. 6.1.4. A time-share condominium is considered a residential use as long as the ownership intervals are 31 days or longer. Any ownership intervals of less duration shall be considered a lodging use.*~~

Example of prohibited Residential Uses: The owner of a house located on Moose Street in the NL-3 residential zoning district outside of the Lodging Overlay, executes a lease or reservation for less than 90 days or limits occupancy in any way for less than 90 days is prohibited. For example, a lease that is executed for 90 days however occupancy/reservation is limited by the lease or other means to a 7-day period is prohibited. Any re-occupation of the house by the owner in the 90-day lease/reservation period is also prohibited.

3. Amend LDR Section 6.1.5.A.1 [Definition of Lodging Uses] as follows:

1. *Definition. A lodging use is a sleeping unit or residential unit rented such that occupancy is limited to less than **90 consecutive days**~~31~~.*

4. Amend LDR Section 6.1.5.C.2 [Standards for Short-term Rental Unit] as follows:

2. *Standards*

- a. *No residential unit or portion of a residential unit may be rented so as to limit occupancy to less than 90 consecutive days ~~31~~ unless permitted for short-term rental.*

Recommendations.

The Community Development Director recommends **approval** of LDR Text Amendment (P21-333).

Background.

Staff finds that it is important to understand the history of lodging and residential uses in the Town to set the context for discussion of the proposed text amendments, as the relationship between these two allowed uses and their associated benefits and impacts to the community are key to determining the correct balance between short-term lodging and residential uses in the community.

In 1967, the Town of Jackson adopted its first zoning ordinance. Several existing motels, such as the Buckrail Lodge (470 S King St), the Snow King Motel (110 E Karns Ave), and the Alpine Motel (70 S King St) were constructed prior to the enactment of zoning and have since functioned as nonconforming uses. Between the period of 1967 and 1994, the Town zoning ordinance permitted hotels and motels in all commercial zones in place at the time, which included most of the downtown area as well as the West Broadway and South Highway 89 corridors. This led to the development of many auto-oriented hotels that utilized large, vacant parcels for prototypical hotel buildings and large surface parking areas. Hotels such as the Virginian Lodge (750 W Broadway), the Wyoming Inn (930 E Broadway), the Hampton Inn (formerly the Days Inn at 350 S Hwy 89), Motel 6 (600 S Hwy 89), and the Super 8 motel (750 S Hwy 89) were developed at this time. Residential uses were allowed in all zoning districts during this period but were primarily located in residential zones. In 1994, the Town adopted a new Comprehensive Plan and Land Development Regulations (LDRs). The 1994 Comprehensive Plan included a “Community Issues Map” which sought to focus lodging uses primarily in the core downtown area to limit impacts of lodging on residential areas and allow visitors to access visitor amenities without use of their car. To implement this vision the LDRs, the Town adopted the Lodging Overlay (LO) which permitted lodging uses only in a specific geographic location and within the Snow King Resort zone. Prohibiting it in all residential zones. All existing lodging uses outside of the new Lodging Overlay were then rendered nonconforming uses.



1994 Community Issues Map. Lodging area depicted within dotted red line

The 2012 Comprehensive Plan, updated in 2020, carried forth many of the themes from the 1994 Comprehensive Plan, including the desire to focus lodging uses downtown to allow access to visitor services without a car and protect residential neighborhoods as housing largely for our local workforce and community.

In 2013 the Town completed an extensive public review of the future of lodging in the community consistent with the 2012 Comprehensive Plan. The analysis was framed in the context of the following 3 themes based upon the policies of the 2012 Comprehensive Plan:

PROTECTION

Residential neighborhoods should be protected from lodging “creep”

- Policy 3.2.c: Limit lodging to defined areas.
- Policy 4.2.f: Maintain lodging as a key component in the downtown

BALANCE

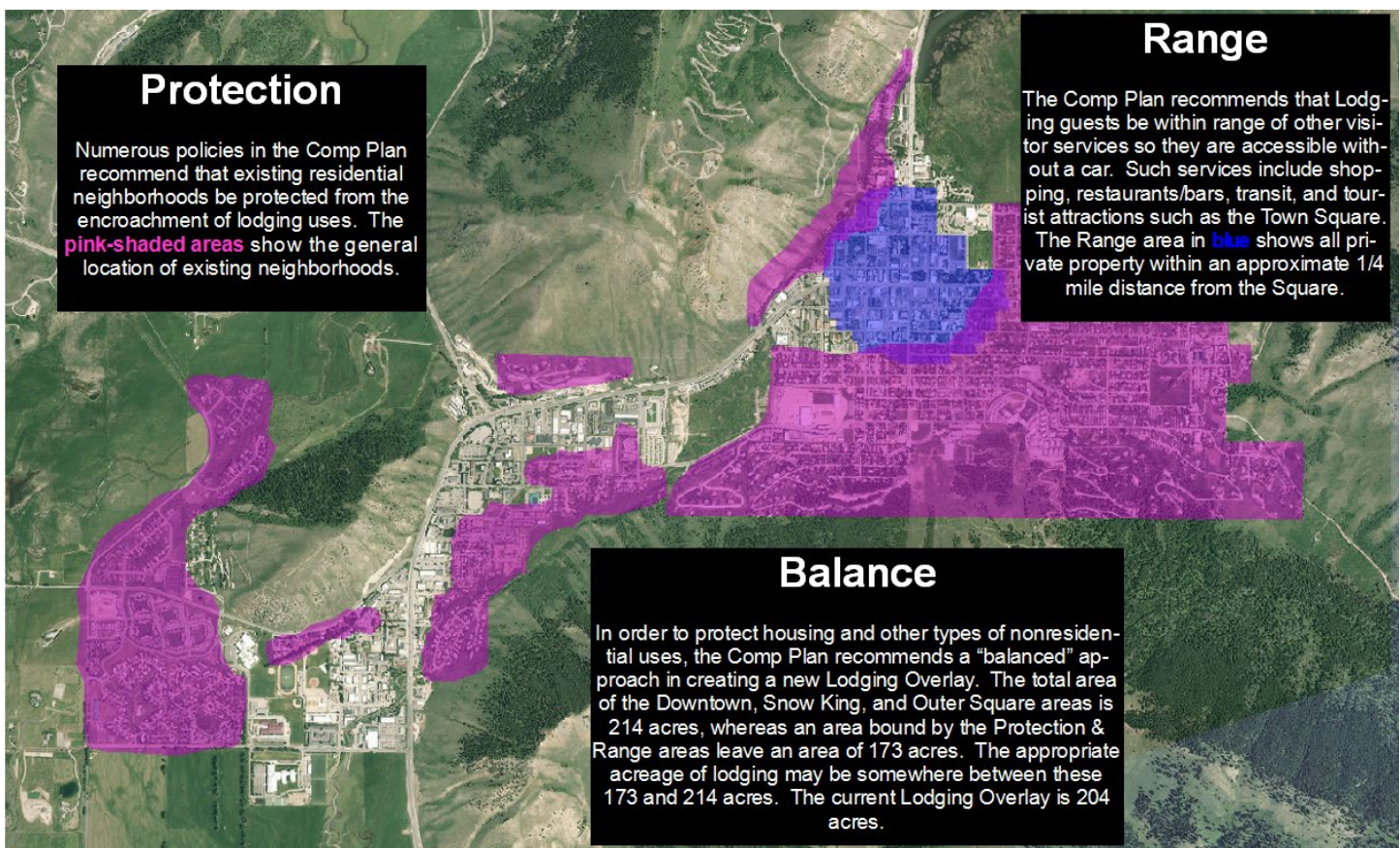
Maintain a desirable balance between residential & nonresidential uses

- Policy 4.2b: Promote a balanced mix of uses.
- Strategy 4.2.S.6: Review the Lodging Overlay boundary and associated regulations and incentives to determine the desired location, type and size of lodging.
- Policy 6.3.e: Balance housing, nonresidential, and civic uses.

RANGE

Lodging guests should be within range of other visitor services accessible without a car

- Policy 3.2.b: Locate nonresidential development in Complete Neighborhoods
- Policy 4.2.a: Create mixed use Subareas.
- Policy 4.2.f: Maintain lodging as a key component in the downtown



As part of this initiative the Town implemented the following policy directions:

- The existing Lodging Overlay should serve as the core area of consideration for lodging, as it is the most preferred and most highly rated option in public comment.

- Existing residential neighborhoods should be protected and considered for exclusion from the Lodging Overlay.
- Existing lodging uses outside of the existing Lodging Overlay should be given the ability to maintain and redevelop.
- Existing lodging uses adjacent to the existing Lodging Overlay should be considered for inclusion.

Subsequent to this effort, in 2016, the Town completed significant updates to the District 2: Downtown Commercial Core LDRs incorporating the work of this lodging initiative along with a transition to a new form-based zoning code based upon the framework of street frontages and building types. Highlights of these LDR amendments resulting from this lodging discussion are:

- The Lodging Overlay boundary from 1994 was left largely unchanged, except that lodging was removed from the Town Square.
- Maximum lodging building and lodging operations square footages were removed. Bulk and scale of lodging structures are now addressed through the Design Guidelines.
- Short-Term Rentals and Conventional Lodging were both allowed as permitted uses.

More recently in 2021 the Town completed updates to District 1: Town Square, including adoption of Historic Preservation LDRs, that included the discussion of lodging uses and building types in this area. This effort concluded with the adoption of revised LDRs and a Downtown Design Overlay that includes new design guidelines to address “western character.” Highlights from these amendments include:

- The Lodging Overlay boundary from 1994 was left unchanged
- Similar to District 2, maximum Lodging building and lodging operations square footages were removed with bulk and scale of lodging structures now being addressed through the Design Guidelines, specifically the addition of guidelines defining “western character.” An exception to this is for lodging buildings in the Town Square-2 zone are limited to a maximum of 15,000 sf and a lodging use is limited to a maximum of 45,000 sf.
- Short-Term Rentals and Conventional Lodging were both allowed as permitted uses in the Town Square -2 district but prohibited in the Town Square -1 district

As this history shows the challenge of balancing short-term rentals and long-term residential uses is not a new topic. The proposed text amendments attempt to improve upon the current balance between these two uses.

The specific area being addressed by the proposed amendment is the length of time required to meet the definition of short-term rental and long-term residential use.

Long-Term Residential Use

In 2016, Council discussed and approved deliberately an interpretation for “long-term residential rentals” that allows owners to rent their residential unit 12 times/year for occupancies of a period of less than one month (e.g., a weekend, one week, etc.), provided the lease period is at least for one month/31 days. Staff finds that this definition has led to “long-term residential rentals” often being utilized as follows:

- Visitors/tourists can occupy these residential units for less than one month but that the unit cannot be re-occupied by anyone else (including the owner) for the rest of the month.
- This allowance is used by many individual homeowners and property management companies to rent primarily to visitors/tourists or non-workforce members of our community, especially as a result of the COVID pandemic. There is evidence that some residential units have been purchased to take advantage of this 12-rentals-per year allowance rather than be rented long-term, thus removing these units from the community housing pool.
- To neighbors, these units look and feel very much like an illegal short-term rental, but they are not. Many complaints come from this misunderstanding.

- Many of the units being rented 12 rentals/year are advertised on vacation rental websites such as VRBO, Flipkey, AirBB, etc., but this is neither illegal nor prima facie evidence of an illegal short-term rental. Again, this is often misunderstood by the public and is the cause of many complaints and consumes a lot of staff time.

Short-Term Rentals (STR)

Short-term rentals are currently defined by the Town in two locations as follows:

- According to the Town of Jackson Land Development Regulations (LDRs), an STR is the rental of a residential unit for less than 31 days.
- According to Chapter 5.60 in the Town Municipal Code (see more below), an STR is the rental of a residential unit for less than one calendar month

Although worded slightly differently staff finds that the two definitions are intended to be functionally the same. As discussed above short-term rentals are only allowed within the Lodging Overlay (downtown) and Snow King Resort Area.

In addition, in 2016, the Town adopted an ordinance regulating and requiring licensing of STRs in Chapter 5.60 in the Town Municipal Code with the goal of improving enforcement and monitoring of this use. Primary features of this permit include:

- A STR license (business license) must be approved and renewed each year (this includes annual fire inspection or fire self-inspection);
- A fee must be paid for STR license (currently \$108/year);
- Notice to neighbors within 300 feet (initial approval only);
- All advertising for unit must include display of valid STR license number;
- STRs are subject to lodging and sales tax collection;
- All new STRs must be checked for compliance with applicable building and fire codes.
- A Basic Use Permit (BUP) must also be approved to ensure compliance with LDR requirements, such as housing mitigation and parking (BUP is approved once, no annual renewal required).

Short-term rental licenses require annual renewals. Although the license process is a business license approved through the Finance Department, the Planning Department has taken over full responsibility of the license process (other than final issuance) because it involves so many planning-related issues. A STR license is required to legally rent units. With over 200 STR licenses currently approved by the Town (approx. 80% in Snow King Resort), the licensing program requires a significant commitment of staff time every year.

Enforcement

Short-term and long-term rental requirements are enforced by the Town Code Enforcement Officer (when available), the Planning Department, and Legal Department. We also have an annual contract with Host Compliance, which is a short-term rental enforcement/management company that uses its own algorithm to search a wide variety of short-term rental websites daily to identify properties possibly being unlawfully used for short-term renting and reports those to the Town on a monthly basis. Host Compliance also generates and sends warning and violation letters (with Town approval) to owners who appear to be in violation of the rules.

Enforcing these requirements is complex, very fact-specific, and time consuming. The primary challenges the Town has in enforcing these requirements include the following:

- Number of Allowed rentals per year: The 12 rentals/year rule makes is nearly impossible, in many cases, to prove an illegal STR.
 - For example, if someone complains about a rental in the first week of the month, we would need to stake out the location for the next 3 weeks to determine if another rental took place or see if the owner reoccupied the unit. While we can periodically check on the unit, it is not feasible to do this 24/7 or at night when violations are most obvious.

- If someone complains about a tourist visit in the last week of the month, we would need to know whether there were any rentals in the previous 3 weeks, or if the owner previously reoccupied the unit, which is not possible.
- Many local owners are familiar with the 12 rentals/year rule and so will include a disclaimer on their website advertisements that states that the *“lease must be for a minimum period of 30 days”* even though they will be renting for an occupancy of *less than* 30 days. We rarely, if ever, enforce against these units because they at least appear to be following the rules. Another example from a recent listing addressing this issue states *“Per Jackson Hole housing regulations, our home cannot be rented for less than [sic] 31 days, nor can occupancy be restricted for less than 31 days.*** This statement must be reflected in all VRBO listings in this area per law, however, this does not indicate interested parties may not rent for a lesser time period, ie., one week rental. The regulation states that we are unable to restrict access for the month block of time. Please do not hesitate to ask questions for clarification as this may be confusing, but must be stated to comply with city regulations.”* This convoluted disclaimer demonstrates how confusing our existing STR regulation are to landowners and their renters.
- Staffing: Since 2016, short-term rental enforcement has been limited in two ways: 1) the Town has only had a Code Enforcement Officer employed for only about half of the time (a maximum of 3 years total), and 2) the position has been staffed by a police officer/community service officer and their time has always been split between LDR code enforcement and other police-related duties, such as parking and animal control, which often take precedence, meaning it was effectively a part-time position. Planning staff have little extra time (or investigative experience) to devote to STR enforcement as well.
- Evidence/Prosecution: Catching people in the act of a STR is rare. Neighbors usually call or complain after the rental has taken place and we often have no evidence other than their testimony. Compounding the issue significantly, neighbors often refuse to provide their name and want to remain anonymous which makes prosecution difficult, if not impossible.
- Host Compliance: The intricacies of the 12 rentals/year rule greatly diminish the effectiveness of the Host Compliance service. Unfortunately, merely identifying a possible violation is the beginning of a long enforcement process. Moreover, because of the rule Host Compliance often misidentifies violations.
 - We don't have great statistics on STR complaints or compliance because, as noted above, STR compliance has been very difficult and inconsistent with fluctuating staffing levels, etc.
 - Number of STR rental complaints: Approx. 50 - 70 since 2017
 - Host Compliance: Has sent out 123 violation letters since 2017.

In conclusion, staff finds that the Town is spending a lot of time and money on compliance with little apparent compliance occurring largely due to the 12 rentals/year definition.

Analysis.

Staff's conclusion from the above background and discussion is that the current definitions for short-term and long-term residential rentals should be amended to achieve the community's desired balance between residential and nonresidential uses and desired protection for residential neighborhoods, while simultaneously allowing for efficiencies in enforcement. Specifically, staff finds that the goals of the proposed amendment are to:

- Achieve further protections for residential neighborhoods from the impacts of STR including but not limited to transient occupancy, noise, parking, increased traffic, etc.
- Address rapidly escalating sales prices for residential properties brought on by the ability to rent short term rent, leading to rapidly increasing property taxes for all residents.
- Address the attractiveness of residential properties being purchased as commodities to diversify investing in the stock market, which leads to units that are not owner occupied and are instead used to generate profits while decreasing the community housing supply.

- Address increased job generation from short term rentals from the active management, cleaning, landscaping, and secondary job generation in the community leading to workers that cannot afford housing on their own without further subsidies from the community.
- Allowing for improved efficiencies in enforcement of illegal rentals.
- Proactively addressing the impacts of Short-Term Rentals on the community.
- Support permitted and desirable lodging and short-term rental uses inside the Town's Lodging Overlay and Snow King Resort to not have to compete with rentals throughout Town, the current regulation significantly increases the supply of lodging in the community by allowing it in all residential zones.
- Maintain residential properties for residents living here full time (increased supply) as either owner occupied or rental units.

Staff recommended amendments are:

Minimum Occupancy: Staff proposes amending the minimum occupancy length from 31 days/1 month to 90 days. Staff recommends this specific 90-day period to both accommodate the need for seasonal workers in rental units and address the issue that the "12-rentals-per-year" practice is leading to the rental of residential properties to tourists/visitors. Staff finds that increasing the minimum lease/occupancy length to more than 90 days (e.g., 120 days) may limit the rental of residential homes to the seasonal workforce, which is still a significant portion of our workforce. In addition, staff finds that increasing the minimum occupancy period further (e.g., to 120 or 365 days) may lead to a situation where seasonal employers would be more likely to master lease rentals then sublease back to employees on a shorter lease term, creating more of a "company town" situation than is desired. Furthermore, increasing the minimum occupancy period may invite significant "lease fraud" among landlords and tenants to create shorter lease periods to accommodate our seasonal workforce.

Definition of Occupancy of Unit: Staff also proposes clarifying how occupancy of a residential unit is defined and will be enforced to address the current situation where shorter lease/occupancy periods are allowed within the minimum occupancy requirements. The proposal to amend the regulations to a 90-day minimum requirement would allow four, 90-day lease periods a year, replacing the current 12 lease periods a year. Staff has clarified in the proposed example what is allowed and not allowed within this requirement including how/when the owner may occupy the unit.

Potential Additional Amendment:

Staff received comment that, in addition to the above proposed change, the regulations should allow for a "locals exclusion" from the 90-day minimum requirement. This would allow locals who own their own home, reside in it full-time, and work locally to rent for less than 90 days as an offset to the high cost of living in the community, including increasing property taxes. A "locals' exclusion" program could be considered, and if so, include the following elements:

- **Eligibility:** Locals who own their own home, reside in it full-time, defined as 10 months of the year, and work full-time, as defined in the Housing Department Regulations.
- **Exclusion:** Eligible owners would be allowed to rent their property twice or three times a year for a period less than 90 days, but for a minimum of 30 days.
- **Permitting:** Eligible owners would be required to obtain a permit/license from the Town for each rental.
- **Renters:** Allowed renters could be limited to the local workforce or unrestricted.
- **Other**

Staff has not made a recommendation on this approach at this time, but have identified the following items for consideration by the Council:

- Does the “locals’ exclusion” program lead to the imposition of the exact impacts of short-term rentals in residential neighborhoods that these amendments are intended to redress?
- What is the likely total demand for this “local’s exclusion”? How many homeowners will take advantage of this option?
- Who is the likely beneficiary of the “local’s exclusion?” Local workers such as teachers, with summer breaks, or seasonal workers with two off-seasons would be logical target audiences for this exclusion.
- Does the proposed “locals’ exclusion” allow for increased income for owners to offset the high cost of living in Teton County, including property taxes and other expenses, while helping to limit the purchase of properties for investment and rental to non-members of the workforce?
- Does the proposed “locals’ exclusion” create another “loophole” that will make enforcement and monitoring more difficult leading to the same situation we are in today?
- Does the proposed “locals’ exclusion” create a very difficult and time intensive administrative permitting and enforcement process, placing a burden on property owners to ensure they follow the program and Town staff to administer and enforce (thus requiring local homeowners to bear the cost of more enforcement staff)?

Staff has included a separate motion related to this topic below. Should the Council be inclined to create such a program, staff requests Council provide direction to staff and the Town Attorney to draft specific LDR and/or Municipal Code language for presentation to Council at a future meeting.

Planning Commission

The Planning Commission heard this item on April 20 and May 18, 2022. The Commission voted 4-1 to recommend approval of the proposed text amendment as presented by staff and voted 5-0 to recommend approval of a “locals exclusion” program be developed along with the proposed text amendment with the recommendation that a working group be considered to further define the program.

The Commission identified that the primary matter to be addressed with the amendment was the impact on the livability of residential neighborhoods from the “12-rentals-per-year” practice where residential properties are used for nightly, and weekly rentals. The Commission acknowledged that they did not find that the amendment would significantly increase the amount of workforce housing in the community but that it was necessary to reduce the impact of nightly and weekly rentals in our residential zones. Further, discussion included wanting to strengthen the current approach to keep lodging and short-term rentals within the lodging overlay and Snow King Resort. In addition, the Commission discussed that 90 days is still a short period of time, and they did not want to continue to encourage more second home ownership and the purchasing of residential properties as investments. The Commission considered that the proposed amendment would affect owners’ property rights and that the Town has limited ability to enforce the current or proposed regulations but in the end the majority found that the impacts to community character outweighed these concerns. The Commission commented that the Town should consider raising fees on short term rentals to cover the cost of enforcement. Regarding the “locals’ exclusion” program the Commission found that additional discussion would be beneficial to determine the details of the program including addressing the following:

- Consider allowing up to 3 - 30-day rental periods, along with 3 – 90-day rental periods
- Consider how Accessory Residential Units should be managed
- Etc.

Possible Alternatives.

Council may select a different number of days other than the proposed 90 and/or choose to make no amendments at this time.

Comprehensive Plan & Priority Alignment.

Policy 3.2.c: Limit lodging to defined areas

Lodging and short-term rental use will continue to be limited to areas within a Lodging Overlay and existing Planned Resort in Town, and the existing County Planned Resorts and Planned Unit Developments where it is entitled. The potential for lodging and short-term rental development is important to the community's tourism economy, but it is not appropriate throughout the Town and County. Concentration of lodging locates short-term accommodations in areas where guests can access visitor-oriented amenities without a vehicle, while protecting the remainder of the community's residential, locally-oriented, and Rural Areas from expansion of tourist-related amenities.

Policy 4.2.e: Maintain lodging as a key component in the downtown

A key element of the 1994 Comprehensive Plan was the establishment of the Lodging Overlay District. The purpose of the overlay was to concentrate lodging into the downtown core, where guests can access tourist-orientated amenities without a vehicle. In addition, the overlay was intended to protect the remainder of the community from expansion and sprawl resulting from tourist and lodging amenities. The community continues to support the original intent of the overlay. Expanding on the goals of the 1994 Plan, this Plan supports the provision of a variety of year-round lodging types that encourage active management for nightly year-round occupancy.

Principle 4.3—Develop desirable residential neighborhoods.

A primary goal of the community is to enhance the character and integrity of Complete Neighborhoods in the Town and County. Town residential neighborhoods will be defined as either "Stable" or "Transitional," Subareas based upon their existing and desired future character. An important goal is to maintain or reestablish a strong sense of ownership by all residents of their neighborhood. The specific designation for each neighborhood and the desired future character is defined in the Illustration of Our Vision chapter.

Staff Factors

Pursuant to Section 8.7.1.C of the Town of Jackson Land Development Regulations, the advisability of amending the text of these LDRs is a matter committed to the legislative discretion of the Town Council and is not controlled by any one factor. In deciding to adopt or deny a proposed LDR text amendment Council shall consider factors including, but not limited to, the extent to which the proposed amendment:

1. *Is consistent with the purposes and organization of the LDRs;*

Complies. One of the primary purposes of the LDRs is to implement the community's goal to protect the character of residential neighborhoods by clearly defining what short-term rentals are and where they are allowed to be located.

2. *Improves the consistency of the LDRs with other provisions of the LDRs;*

Complies. Clarifying the definition of residential and lodging uses is key to ensuring consistency within all sections of the LDRs.

3. *Provides flexibility for landowners within standards that clearly define desired character;*

Complies. The proposed text amendment provides adequate flexibility for landowners to reasonably develop or redevelop their property utilizing the proposed definitions and requirements.

4. *Is necessary to address changing conditions, public necessity, and/or state or federal legislation;*

Complies. These amendments address a changing condition related to how residential properties are currently being used.

5. *Improves implementation of the Comprehensive Plan; and*

Not Applicable per Wyoming State statute.

6. *Is consistent with other adopted Town Ordinances.*

Complies. The proposed amendment does not conflict with any other Town Ordinances.

Fiscal Impact.

None.

Staff Impact.

Staff has spent approximately 70 hours to complete research on this topic and prepare this staff report.

Attachments or Links.

Public Comment

Suggested Motion. *Council always has the option to adopt, approve with conditions, continue, or deny items.*

Item 1

I move to **approve** LDR Text Amendment P21-333, based upon factors 1-6 in Section 8.7.1.C of the Land Development Regulations as presented in the June 21, 2022 staff report and direct staff to prepare the proposed amendment in ordinance form for consideration by Council at a future meeting.

Item 2

I move to **approve** the proposed “locals’ exclusion” program to be incorporated as part of proposed LDR Text Amendment P21-333 and/or in the Municipal Code, based upon factors 1-6 in Section 8.7.1.C of the Land Development Regulations as presented in the June 21, 2022 staff report and direct staff to prepare the proposed amendment in ordinance form for consideration by Council at a future meeting.

Annette Langley

From: Estela Torres <etorres0104@gmail.com>
Sent: Wednesday, April 20, 2022 10:06 AM
To: Tyler Sinclair
Subject: 30 day rentals

Dear Tyler:

I am in favor of keeping the rental period of 30 days. There are many people who abide by the rules and rent their residences when they are away for a month. I, for one, have rented to people who are working in Teton County and need a temporary place to stay while they secure more permanent lodging; and i know of other people who do the same. This 30 day rental supplements income to locals who need it in order to live in this expensive town and pay exorbitant property taxes because of the high end real estate.

Thank you.

Sent from my iPhone

Annette Langley

From: JP Carey <jpcarey4@gmail.com>
Sent: Wednesday, April 20, 2022 8:45 AM
To: Tyler Sinclair
Subject: Development Proposal in town



Hi Tyler,

I wanted to write you to say I am in support of extending the short term rental of the new development in town from 30 to 90 days. Our town desperately needs to keep its workforce here and I believe the shorter rental options they have, the fewer ways we will keep them here. We have enough short term rental opportunities and not nearly enough long term solutions. While 90 days is still too short, it is a start. Thanks for reading,

Best,

JP

Annette Langley

From: Julia Olson <olsonjulia15@gmail.com>
Sent: Wednesday, April 20, 2022 8:55 AM
To: Tyler Sinclair
Subject: Extend minimum short term rental length



Hello Mr. Sinclair,

I hope this email finds you well. I am a Wilson resident and local educator and volunteer. I am writing in support of the extension of the minimum length for a short term rental from 30 to 90 days. I live in workforce housing on Moose Wilson Rd with my partner and a roommate, and I feel so lucky both to have housing I can afford, and to be surrounded by folks that actually work in Jackson and are active members of the community. Of course, like everyone in Jackson, I have seen dear friends and key community contributors have to leave their jobs and move away from Jackson due to the housing crisis.

Extending the short term rental length will help reduce the stress tourists place on our housing, and open up more housing options for the folks who make our community work: servers, teachers, nurses, grocery store workers, bus drivers, tour guides, and more. Three months is likely longer than a tourist will stay, but **three months can serve as a lifeline between long term housing situations for working folks, and can make the difference in helping people remain in our community.**

I hope you take this into consideration this evening with the Town Planning Commission.

Thank you!

Julia Olson
1751 Moose Wilson Rd, Wilson

Annette Langley

From: Anna Sullivan <annasullivanphotography@gmail.com>
Sent: Wednesday, April 20, 2022 6:22 PM
To: Tyler Sinclair
Cc: Anna Sullivan
Subject: Extend Short Term Rentals

Dear Mr. Sinclair,

I am writing you this evening to beg you to please support extending the minimum rental length for short-term rentals from 30 to 90 days.

I want my neighborhood to remain a neighborhood and not become a hotel or have visitors in and out constantly. We need to keep our community solid and it's being lost on a daily basis. We are losing the soul of Jackson Hole.

Thank you for your consideration.

All the best,

Anna C. Sullivan
Jackson Full-Time Working Local Resident

Annette Langley

From: David Hinck <davidhinck@gmail.com>
Sent: Wednesday, April 20, 2022 12:50 PM
To: Tyler Sinclair
Subject: Extend the minimum short term rental rate

Tyler,

I know extending the minimum short term rental rate may sound like it's encroaching on certain rights or Freedoms, but I want you to know my story. Real estate agents raked in a killing telling buyers throughout Covid pandemic that they could get around our short term rental rules by leasing their house out through Airbnb or vrbo for a specified amount under 30 days. I over heard them while they were showing the house I had rented for two years. My house on Aspen drive was bought by a californian and I was forced to move into the abyss of no housing while he makes money off the community I've lived and worked in for 10 years. Please extend the minimum and get housing back to workers and not rich out of staters trying to use our work force housing as an investment tool!

Regards,

-Dave Hinck

Ps- excuse any typos because I'm typing on my phone. If you have time and want to hear details 618 835 8340.

Sent from my iPhone

Annette Langley

From: Chris Perkins <perkinw@gmail.com>
Sent: Wednesday, April 27, 2022 1:07 PM
To: Tyler Sinclair
Subject: Extending Minimum Short Term Rental Length



Hi Tyler,

My name is Chris Perkins and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County—in my case having to relocate homes multiples times and watching good friends lose stable housing after being unable to afford rent increases.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

Best,

Chris Perkins

Jackson, WY

(206) 303-7315

Annette Langley

From: Miles Yazzolino <yazzojazz@yahoo.com>
Sent: Wednesday, April 27, 2022 6:57 PM
To: Tyler Sinclair
Subject: Extending Short Term Rental Length to Preserve Our Housing in this Community

Hello Tyler and members of the Town Planning Commission,

My name is Miles Yazzolino and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County.

I've seen too many of my friends, my mentors, my teachers, my own family pushed out of this valley by unsustainable housing price increases and an influx of very short term renters able to pay top dollar. Compass Jackson Hole's reports of a 45% year over year increase in the median housing price here is startling, and will result in more homes sitting empty most of the year while hosting guests a few days a month. That is why it is so crucial to extend the minimum length for a short term rental from thirty days to ninety days, while also allowing homeowners who live in their homes at least 10 months/year to rent short term to help make ends meet.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of its old self, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real pain when it comes to housing security. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Sincerely,

Miles Yazzolino (he/him)
24 year Teton County resident and ShelterJH Member

Sent from Yahoo Mail on Android

Annette Langley

From: Andrew Ward <andrewward01@yahoo.com>
Sent: Wednesday, April 20, 2022 8:56 AM
To: Tyler Sinclair
Subject: Extending the short term rental

Hello,

I am in favor or extending the short term rental from 30 to 90 days. As a small business owner it's tough to watch what is going on in this town/ valley. I know of a lot of people who are breaking these rental rules already. I would like to not only see this changed but also policed. It would be great for a way for residents to have a good way to report. If there already is I apologize I just don't know how to.

Thanks,

Andy Ward
Owner Hatch and Reward property management
484-437-7577

Annette Langley

From: Julien Hass <julien.hass@gmail.com>
Sent: Wednesday, April 20, 2022 9:29 AM
To: Tyler Sinclair
Subject: Extension of short term rental time period



Good morning Tyler,

I am writing to voice my desire for you to extend the minimum length of short term rentals from 30 to 90 days. It is important to do so for the town of Jackson in order for many employees to be able to find a place for 3-4 months, which is often the time necessary for an individual or family to find an acceptable place to live, in or near Teton County.

I also believe extending the "short term rental" period from 30 to 90 days, at the very least, may help alleviate the seasonal employee housing crunch, especially during the summer. Many seasonal employees during the summer are only here for 3-5 months, and have no issues living in a potentially higher priced rental. I strongly believe extending the short term rental time period can help both seasonal employees and long term locals, and benefit businesses as well. Some local business owners may own short term rental units or may want to and this extension can help them house some employees during the summer/winter high period, and may help alleviate some stress, both for employees and employers.

Have a good day!

Julien Hass
julien.hass@gmail.com
307 920 0747

Annette Langley

From: Jill Callahan <jillcallahan@gmail.com>
Sent: Wednesday, April 20, 2022 12:52 PM
To: Tyler Sinclair
Subject: Feedback on extending minimum short term rental length to 90 days



Dear Tyler,

I urge you to extend the minimum length for a short-term rental from 30 days to 90 days. This will immediately make more homes available for locals.

Please restore short-term rental units to the local rental market.

Respectfully,
Jill Callahan

--

Jill M. Callahan
781.910.1045

Annette Langley

From: Madeleine Hurlbut <madeleine.hurlbut@gmail.com>
Sent: Tuesday, April 19, 2022 4:44 PM
To: Tyler Sinclair
Subject: I support extending the minimum rental length for short term rentals from 30 to 90 days



Hi Tyler,

I'm writing in support of extending the minimum rental length for short-term rentals from 30 to 90 days.

I am a JH resident (+4 years) and a seasoned property management employee, and I have seen firsthand the direct impact that short-term rentals have had on locals. The dramatic increase in second homeowners choosing to use their property as a turnkey hotel has severely decreased the opportunities available for those of us who choose to live and work here. I have seen many dear friends forced from their housing because their landlords had the opportunity to make more money (hand over foot) in the short-term market. By eliminating this option, homeowners will hopefully begin to view their property, not as a churn and burn rental unit, but as a viable living option for local workers who help keep this town afloat.

Thank you for your consideration.

Best,
Madeleine

--

Madeleine Hurlbut
206.225.8035 | Jackson WY | [linkedin](#)

Annette Langley

From: Ariel Kazunas <akazunas@gmail.com>
Sent: Wednesday, April 20, 2022 5:49 PM
To: Tyler Sinclair
Subject: In Favor of Extending the Minimum Length of Short Term Rentals



Hi there -

My name is Ariel Kazunas. I am writing tonight to offer my support of the proposal being considered by the Town Planning Commission to extend the minimum length for a short-term rental from thirty days to ninety days.

We are all affected by the current and ongoing housing crisis in Teton County and its surroundings, whether we have lived here for four generations or four months, whether we own several properties or are struggling month to month to make rent, whether we choose to live out of vehicles to cut costs or are experiencing undesired houslessness.

Addressing said crisis with positive and proactive change only improves our collective character, by ensuring a diversity of residents, with the many talents, ideas, professions and passions they possess, can remain here to strengthen and add richness and depth to our community. (That, and plow our roads, teach our children, nurse our suffering, unclog our drains, stock our stores, treat our water, respond to our emergencies, etc...)

Extending the minimum length for a short-term rental to ninety days would increase the likelihood that existing rental units in Jackson might become available to locals, rather than tourists. It would ensure that my vibrant neighborhood (and other neighborhoods like it) remains intact, rather than becoming, effectively, due to the allowance of thirty day short-term rentals, blocks upon block of, effectively, small hotels.

And, lastly, extending the minimum length for short-term rentals to ninety days would mean that I, my coworkers, my friends and my neighbors will continue to have a chance to live where we work, and will therefore be able to continue to contribute to the betterment of our community overall. There are SO many hotels, luxury condos, and short-term rentals already available for tourists in Teton County; housing within city limits, where there is access to public transit options and where residents are in proximity to business / employment hubs, should be prioritized as much as possible as for locals.

Denying folks from different socioeconomic backgrounds the chance to experience housing security because we are blindly committed to and focused on some short-term rental bottom line is unbelievably inhumane. It also shoots us ALL in the foot: at some point, there will come a day when this town is a shell of its old self, unable to regenerate and flourish as its younger, less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met.

It hurts (honestly almost physically) to watch as long-term rental after long-term rental gets torn down here in East Jackson, to make way for designer homes that are most often purchased by property management companies looking to increase their short-term rental offerings. I lose neighbors nearly every month to this devastating trend, and there doesn't seem to be anything I can do about it. We have apparently decided to put profit before people in Jackson, and we, the people, bear the brunt of the ensuing consequences.

As I have said in letter after letter to the County Commissioners, to the Town Planning Commission, to the Town Councilors, I, and folks in this community like me, WANT to be the neighbor who will lend you a cup of sugar. But we need a roof under which to store that sugar first.

Lengthening short-term rental minimums is a very small step in the right direction when it comes to addressing the housing crisis here in Teton County. I recognize that it might not preclude the very wealthy from renting a home for ninety days even when they only plan to be present for thirty of them; I also recognize that it does not address the need for enforcement of this change to have any real effect. That said, it is still a step, and better it be forward than not at all.

All my best, and thank you for your time,

Ariel Kazunas

8 year Teton County resident

Current East Jackson resident

Future ex-Jackson resident if we do not collectively choose to put people before profit and community first.

Annette Langley

From: Liz Lynch <elizabethnlynch@gmail.com>
Sent: Wednesday, April 27, 2022 7:49 PM
To: Tyler Sinclair
Subject: In support of extending the minimum short-term rental length



Good evening, members of the Town Planning Commission,

My name is Liz Lynch, and as a resident of Jackson for 3 years (previously, of similar outdoor resort towns in Idaho and Montana), I'm writing to you in support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty (30) days to ninety (90) days.

We are all affected by the current and ongoing housing emergency in Teton County. Personally, in addition to my own housing security concerns, I've seen how the replacement of longer term rentals for locals by short term rentals has negatively impacted our ability to sustain a local workforce. I work for the U.S. Forest Service, and in a position that had 40+ applicants for two positions, we were only able to hire one person, because multiple others had to decline, citing the lack of suitable housing options. The future is grim if we can't find ways to offer housing to seasonals for at least 3 months (usually more like 4-6 months) at prices they can afford on a government salary or internship stipend. I worry about what that means for the future health of our Forest and public lands in and adjacent to our town, if the boots on the ground tasked with making good work happen are priced out for good.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already many lodging options for tourists in and near Teton County. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

This change is by no means a silver bullet— but it would make a statement that our priority is to our community, our neighbors. Supporting this change would be a wonderful first step in the right direction.

Thank you for your time and consideration.

Sincerely,

--

Liz Lynch

C: (908) 803-2998

Annette Langley

From: Ash Hermanowski <ash.hermanowski@gmail.com>
Sent: Wednesday, April 20, 2022 6:40 PM
To: Tyler Sinclair
Subject: Increasing STR Minimum



Hi Tyler,

I'm writing to voice my support of increasing the minimum short term rental length to 90 days.

As someone who lives in the Aspens, I have seen how short term rentals have ruined neighborhoods. Simply put, I don't have any neighbors. Airbnb guests check in and out every day. I can hear rental car alarms going off at all hours of the night. House parties. You name it. We've already lost this neighborhood, but maybe that doesn't have to be the case for others in the area.

I want to RESTORE these short term rentals back to the rental market for locals. If people can't afford to pay their taxes or pay their mortgages because they spend "winters and summers" here, that's not our workforce's problem. We live here, we work here, we should have access to this housing. I don't want this decision to be swayed by homeowners and businesses who benefit to gain huge profits, or at least benefit Second homeowners in order to keep their little slice of Jackson.

I want a chance to keep living where I work. Why would we continue to prioritize the super privileged in our community instead of those who need housing?

Other mountain town communities have implemented measures like this and it has been very successful. I hope this is approved.

Thank you.

--

Ash Hermanowski
she/her/hers
c: 802-585-4061

Annette Langley

From: Phil Stevenson <phils@tccgjh.com>
Sent: Wednesday, April 20, 2022 5:52 PM
To: Tyler Sinclair
Subject: Increasing the Minimum Rental Period for Properties Not In the Lodging Overlay from 31 to 90 Days



Mr. Sinclair and Staff,

I am writing to voice my strong opposition to increasing the minimum rental period from 31 to 90 days for properties not in the Lodging Overlay, for the following reasons:

- The underlying premise of this proposal, though unstated as such, is that Renters Are Bad, bringing unwanted noise and bad conduct to the valley. In my experience this is simply not true, as most guests are here for the same reasons we are: natural beauty, abundant wildlife, and unparalleled outdoor recreation. If they want to raise hell, they can do that back home without going to the expense of coming to Jackson.
- The proposed changes would certainly decrease the number of guests renting in Town, but if the belief is that more homes would be then used for worker rentals, there would be no diminution of traffic or demand for Town services.
- Most rentals occur in the summer, so arguably under the current proposal there might be one rental that encompasses July, one that encompasses August, and one that includes most of ski season. While we certainly have seasonal workers, this likely rental pattern would preclude seasonal rentals and besides, most residents of the valley are looking for at least a one year lease.
- With the advent of the acceptability of remote working, we are seeing more guests who want to spend 30 or so days here. Ninety days would preclude most guests, however, especially those with school age children.
- Rather than address possible benefits to the community if the proposed changes were to be adopted, most of the staff report is spent lamenting the onerous requirements on staff time and effort. Respectfully, public policy should not be driven by its impact on Town administration. Even so, the challenges appear to be overdrawn, with a prime example being the statement that there have been approximately 50-70 complaints about short term rentals since 2017. This equates to an average of about one such complaint a month, which on its face should not be unduly burdensome.
- Whatever happened to Wyoming being a state that respects and values individual property rights?

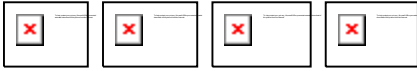
In conclusion, there has been a sea change in the type of lodging people desire since the Comp Plan was written in 1994, away from the old hotel model and towards the rental of private homes, providing much needed income to the property owner and a much better guest experience, especially for families. Our local economy is largely built on visitors seeking this type of accommodation, and it would not be good public policy to discourage them from coming to our valley.

Phil Stevenson

Phil Stevenson | *Partner* | *Responsible Broker*

Office (307) 732-3400 | Direct (307) 732-5922 | Cell (307) 690-3503

120 West Pearl Avenue, Jackson, Wyoming 83001
PO Box 10609, Jackson, Wyoming 83002



Annette Langley

From: Howard Garber <howardgarber@sbcglobal.net>
Sent: Thursday, April 21, 2022 12:58 PM
To: Tyler Sinclair
Subject: JHLA Agenda 4/20/22



Dear Tyler,

I was informed about the Town of Jackson Homeowners' Rental discussions of last night at about the time the discussions were taking place. I was unavailable at that time to participate due to previous obligations. So my apologies to you for my tardiness and I hope that I can add some constructive points to last night's discussions, if possible.

Let me begin by saying that I have considered and am sympathetic to both sides of the argument; the need to provide housing for an increased work force and the concern of homeowners for home value dilution. As such, I would like to suggest a solution to this concern that comprises both concerns. To wit, keep the homeowners' right to rent for thirty days or less intact with no alteration. For simplicity and clarity, let's call the homeowners' who have been renting through this process for years, Group A. To accommodate the needs of the town for additional worker housing a second group of real estate properties could be formed, let's call this Group B. Group B housing would be composed of those properties whose owners wish to rent their units to a less traffic-ed, more consistent renter that probably won't deteriorate the property as much as the transient flow-through of the very short term renter. If the town of Jackson feels that it needs to assist the workers in establishing a base or cap rental price or if the town feels it should become a conduit for workers to obtain Group B housing through businesses it could establish an agency to oversee and assist in this valuable need.

I hope that this email gives you an overview of my vision for a prosperous Town of Jackson real estate plan. I again apologize for the presentation tardiness. I will be very happy to provide further detail should you seek that. Please contact me at: e mail, howardgarber@sbcglobal.net or preferably 312.933.6130.

Respectfully,

Howard B. Garber

Annette Langley

From: Matt Schebaum <matt.schebaum@vacasa.com>
Sent: Wednesday, April 20, 2022 1:37 PM
To: Tyler Sinclair
Subject: Minimum Rental Length for Short-Term Rentals



Dear Tyler,

I wanted to reach out and express my opposition to extending the minimum rental length for short term rentals from 30 to 90 days. I hope you can pass along this information for the Councilors to review before any vote.

While I understand the sentiment and overall housing situation in Jackson (I've lived in the City of Jackson for 10 years), stricter regulations on short-term rentals is a slippery slope that may have unfair or unintended consequences on many stakeholders, including homeowners, without much effective benefit to Jackson residents.

First, it should be carefully examined whether extending the minimum will have any real effect on the availability of long term housing and not just weigh on homeowners unequally.

Second, among the core rights that a property owner has is the right to lease or rent the property. This right has long been recognized by the courts. For example, the Supreme Court of Connecticut has explained that the "right to rent" is one of the important "sticks" in the bundle of property rights, stating: [It] is undisputable that the right of property owners to rent their real estate is one of the bundle of rights that, taken together, constitute the essence of ownership of property.... Owners of a single-family residence can do one of three economically productive things with the residence: (1) live in it; (2) rent it; or (3) sell it. The inherent nature of this right to rent is supported by a leading treatise, Thompson on Real Property, which observes that "the right to lease property is an incident of ownership."

Short-term rental regulations can infringe upon this fundamental property right in many ways, including (1) outright bans on short-term rentals, (2) licensing requirements, and (3) mandatory inspection requirements.

Third, while most short-term rental regulations are adopted as a general regulation under the local government's "police power," some communities have instead chosen to regulate short-term rentals under their zoning code. The problem with this approach is that the regulation of short-term rentals does not fall within the scope of local zoning authority. The reason is that a key characteristic of local zoning power is the long-established principle that "zoning deals with land use, not the owner, operator, or occupant of the land."⁶ Zoning inherently pertains to land rather than to the landowner, or user—it "deals basically with land use and not with the person who owns or occupies it."

Zoning regulation of short-term rentals violates this fundamental principle in that it focuses not on the use of land, but on the form of one's interest in property (i.e., owner or renter) and the duration of the occupancy (e.g., short-term vs. long-term).

I hope this message will reach the councilors desk so as to consider all stakeholders and the effective consequences of more regulations on short term rentals in Jackson.

Thank you all for your time,



Matt Schebaum
Sales Executive

[Schedule a meeting with me](#)

m: 307-368-0034

[vacasa.com](#)

My favorite Vacasa destination is Maui, HI

Annette Langley

From: Katy Flanagan <katy.flanagan67@gmail.com>
Sent: Tuesday, April 19, 2022 3:29 PM
To: Tyler Sinclair
Subject: Minimum Rental Time: 30 to 90 Days

Hello, I am writing to express my support for the change from 30-90 Days for short term rentals. As of yesterday, I am once again houseless as my new housing situation turns to short-term rentals. I will be living in my vehicle this summer, unless a miracle happens. This would be great if I were a raft guide, but as a nursing student, I should have more access to a shower than car camping provides. We have plenty of hotels for visitors, and more keep going up- ironic since they won't be able to staff them all if short term rentals are permitted to continue.

Katy Flanagan

Annette Langley

From: Jim Sulciner <sulciner@gmail.com>
Sent: Wednesday, April 20, 2022 6:40 PM
To: Town Council
Cc: Tyler Sinclair
Subject: New land development regulation



To Planning Commission,

I'm writing to express my opinion on the Planning Commission's intent to enact a new Land Development Regulation that would prohibit any residential unit within the rental overlay to be rented for less than 90 days.

The ongoing housing shortage for the workers who are an integral part of this thriving community is a serious and worrisome matter which affects all of us as local business owners and residents.

There is little evidence however, that increasing rental restrictions in this way will actually contribute to housing options for the local workforce.

The matter of affordable housing needs more discussion and alternatives to the proposed rental restrictions should be considered before any changes are made. Specifically, answers to the following questions should be thoughtfully regarded:

- 1) What problem is being addressed by putting a restriction on rentals in this way?
- 2) How does enacting a 60- or 90-night minimum help to solve the lack of affordable housing?
- 3) Our property tax has doubled since purchasing our home in 2020 why not use these new funds to build affordable housing?

As a member of the Jackson community, I am committed to supporting the efforts to increase available housing for the workforce whether through monetary donations, volunteer hours, or other community involvement. But I do not believe that increasing the nightly stay minimums is the solution. Please consider opening the floor to more discussion before a final decision is reached on this matter.

Respectfully,

Jim Sulciner

Annette Langley

From: noreply@civicplus.com
Sent: Wednesday, April 20, 2022 6:14 PM
To: Tyler Sinclair
Subject: Online Form Submittal: Email Tyler Sinclair



Email Tyler Sinclair

Email Content: Dear Mr Sinclair,

We purchased our new townhome in the Hidden Hollows development in Jackson with the intention to rent it for a few 30-day periods each year. This was part of our calculation in evaluating the affordability of Jackson versus other locations. The "once per 31 days" rule is already highly restrictive compared to every other town we considered in the US. We sincerely hope that the town does not make the rule even more restrictive than it already is.

Best,
Matthew Russman

Your Name:	Matthew Russman
Your Company Name:	<i>Field not completed.</i>
Your Phone Number:	646-872-3448
Your Email Address:	matt.russman@gmail.com
Your City:	Jackson
Your State:	WY
Your Zip Code:	83001

Email not displaying correctly? [View it in your browser.](#)

Annette Langley

From: noreply@civicplus.com
Sent: Sunday, April 24, 2022 1:59 PM
To: Tyler Sinclair
Subject: Online Form Submittal: Email Tyler Sinclair



Email Tyler Sinclair

Email Content: This was returned from regular email, so I will send a copy here, Mr. Sinclair, through our Jackson website:

Dear Mr. Sinclair,

When my family purchased our home in Jackson, I was working full time, and nonetheless it was a stretch; we both know about property values here, even eight years ago when it was bought. Now retired, I rely on the income I am able to get from renting occasionally which supplements my Social Security. If we implement the proposed 90-day minimum stay, you will have shut me and my family down completely. It was already hard enough at 31 days, given that few vacationers want a home beyond two weeks.

While we seem to have a housing shortage, is zeroing in on this segment of our community the answer? The report from staff itself said on page 5 that "There is evidence that some residential units have been purchased to take advantage of these 12 rentals per year allowance." That is hardly the smoking gun one might want to prove the culpability of homeowners as the cause of a worker shortage, don't you think?

While we might want to stem real estate speculators from gobbling up properties that could house workers, do we want to punish our local population for the crime of owning their homes and paying their taxes, which, as you likely know, went up quite steeply this year?

If you feel you must implement this punitive and ill-conceived program, may I ask that you allow those who have already purchased be grandfathered in and exempted from the 90 rule?

As an admittedly exaggerated parallel, consider this alternative: the Town confiscates 10% of the rooms at the Four Seasons

and establishes a maximum rent of \$2,000 a month as affordable housing, thereby requiring this hotel to charge \$69 a night for those rooms. Maybe all the hotels, come to think of it.

It's unthinkable, but it is of the same sort of unjust strong-arm tactics by a government agency claiming control over personal property that was hard won through honest work. Do please consider.

Sincerely,

William Reinecke
687 E. Kelly Ave.
805-660-0505

Your Name:	William Reinecke
Your Company Name:	<i>Field not completed.</i>
Your Phone Number:	8056600505
Your Email Address:	timberlove@mac.com
Your City:	Jackson
Your State:	WY
Your Zip Code:	83001

Email not displaying correctly? [View it in your browser.](#)

Annette Langley

From: Mckenzie Myers <mckenziemyers@gmail.com>
Sent: Tuesday, April 19, 2022 4:31 PM
To: Tyler Sinclair
Subject: Please Change Short-Term Rentals to 90 Days



Hi Tyler,

It has come to my attention that tomorrow the Town Planning Commission is considering extending the minimum length for a short-term rental to 90 days. As a 7-year community member and local worker who is quickly being pushed out of town due to a lack of long-term rentals, I think this policy change could have widespread positive impacts for local workers.

I have never heard of more people searching for housing than I have this spring. Quite frankly, it is depressing how many people I know who have worked so hard to make the community what it is -- and in essential but low-paying jobs -- who have no option but to leave. I have heard of many people losing their long-term rentals because short-term rentals are more lucrative. I believe this could deter homeowners from pursuing short-term rentals and help maintain community character, avoid neighborhoods from becoming hotels, and give workers a chance to live where they work.

I can't urge or ask you enough to look out for the folks who can't afford to buy a home here but work hard to make Jackson, Jackson.

Thank you again for your time and representation,

Mckenzie Myers

Annette Langley

From: Amanda Flosbach <flosbacha@gmail.com>
Sent: Wednesday, April 27, 2022 3:05 PM
To: Tyler Sinclair
Subject: Please extend the minimum short-term rental length!



Hello members of the Town Planning Commission,

My name is Amanda Flosbach, and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County.

I myself am in temporary housing (thanks to a philanthropic friend) as I continue to look for a long-term rental or hope to purchase an affordable/workforce unit. I have been looking without luck since November of 2021. This will be my 11th move in 20 years of calling Teton County my home. I lost my most recent residence because the owner's remote working relative preferred to be in the guest cabin I inhabited. Over the years, I have moved from other homes as they were sold, demolished, or inhabited by owners' friends and relatives. As an experienced professional in the nonprofit arts, I regularly contribute to our community by creating education programs for youth and adults, by performing as a musician myself and by volunteering for community projects. Making a career of these contributions has come at a price: an income to afford me the ability to enter the free market as a homeowner in Teton County.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of its old self, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real pain when it comes to housing security. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Sincerely,

Amanda Flosbach
20-year Teton County resident
6225 N Spring Gulch Road (until June 30)
307-690-0628
flosbacha@gmail.com

Annette Langley

From: Adrian Croke <adrian.croke@gmail.com>
Sent: Thursday, April 28, 2022 4:18 PM
To: Tyler Sinclair
Subject: Please extend the minimum short-term rental length!



Hello members of the Town Planning Commission,

My name is Adrian Croke and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County. I've lost valuable friends and colleagues to other states due to the housing crisis, folk who would have otherwise joyfully continued to offer their volunteer hours, expertise, skills, money, and joy to Jackson. I can't help but feel that further limiting the number of short term rentals could have opened up more housing for those folks who were pushed out. I believe we need to be doing all that we can to combat the housing crisis, and extending the short-term rental minimum stay from 30 to 90 days could be an important part of the complex solution that we need.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of itself, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real struggle when it comes to housing insecurity. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Thank you for your work and your consideration of my thoughts.

Best,

Adrian Croke
10 year Town of Jackson resident

Annette Langley

From: Leslye Hardie <hardie.leslye@gmail.com>
Sent: Wednesday, April 20, 2022 9:11 AM
To: Tyler Sinclair
Subject: Please lengthen the time for s-t rentals

Dear Tyler,

Thank you for your never ending work to manage this small town where everyone has a strong opinion. Anything you can do to lengthen the time on rentals to protect more of our workforce would be greatly appreciated. Many thanks,
Leslye and David Hardie

Annette Langley

From: Charles Lynch <lynch522tw@gmail.com>
Sent: Wednesday, April 20, 2022 5:32 PM
To: Tyler Sinclair
Subject: Property rentals - Property Rights



From: Charles Lynch <Lynch522TW@gmail.com>

Date: April 20, 2022 at 4:19:48 PM MDT
To: tsinclair@jacksnwy.gov
Subject: Property rentals - Property Rights

Dear Mr. Sinclair,

As a property owner in Wilson and an owner in town, I am very much against the further erosion of our property rights as expressed in the redefining of minimum rental terms. It's a fallacy to think that eliminating short term property rentals will have a substantial positive impact on our workforce housing issue or on congestion. If the longer stay term were to pass, homeowners with simply charge a higher which people would be willing to pay in this market. Those who don't want to pay higher rates would simply stay at local hotels. Homeowners who offer short term stays most often spend a few months or longer in Jackson Hole. Very few, if any, what convert into year or longer leases. Even if they were to do so, it would be at a rate which people looking for affordable housing could not afford. If the town and county truly want to solve the affordable housing issue, they need to invest substantial money and efforts in collaborating with developers to create higher density projects. The LDR's need to be revised to incentivize these types of projects. And opportunities such as the north south park project need to be capitalized on in a expeditious and efficient manner. Going after short term rentals is a feel good option not an effective long term solution.

Many thanks for your time.

Charles Lynch

Sent from my iPad

Annette Langley

From: Phil Stevenson <phils@tccgjh.com>
Sent: Thursday, April 21, 2022 11:06 AM
To: Tyler Sinclair
Subject: Proposal to Extend Period for Minimum Rentals to 90 Days



Hi Tyler,

Prior to last night's Planning Commission meeting, I was uncertain as to the motivation behind the proposed extension of minimum rentals outside of the Lodging Overlay from 31 to 90 days, but the questions and comments at the meeting clarified that for me. For while community character and burden on staff time were mentioned, clearly the primary concern is whether such an extension would increase the availability of workforce housing. The individuals who commented in favor of the extension uniformly believe that the 90 day minimum would increase such availability, but in all likelihood it wouldn't. Why?

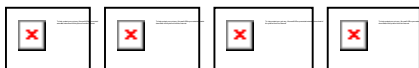
- Most renters are looking for the stability that comes with a rental of ideally a year, which wouldn't be possible whether a property had 30 day or 90 day rentals.
- Most properties impacted would need to rent at a number well in excess of what members of the workforce could pay.

We all are concerned about the lack of workforce housing, but the proposed change won't get us there. Rather, it seems like the proposal falls under the umbrella of "we've got to do something", but by passing this ineffective amendment, we run the risk of collectively taking our eyes off the search for real solutions, erroneously believing that we have done something to address the problem, when in fact, we haven't.

Phil Stevenson

Phil Stevenson | *Partner* | *Responsible Broker*

Office (307) 732-3400 | Direct (307) 732-5922 | Cell (307) 690-3503
120 West Pearl Avenue, Jackson, Wyoming 83001
PO Box 10609, Jackson, Wyoming 83002



Annette Langley

From: Paul George <paulggeorge@yahoo.com>
Sent: Wednesday, May 4, 2022 12:50 AM
To: Tyler Sinclair
Subject: Proposed Change in Rental Regulations for Non-Resort Properties

I want to reiterate my prior objection to the proposed change in rental regulations. In addition to the objections raised in my earlier email to you I wish to reiterate one point. The implementation to the proposed regulation for most if not many of the potentially affected properties will not result in any increase in affordable rental properties in the Jackson Hole area. The information provided in the reports from the City don't include data demonstrating the the proposed change will result in an increase in available properties. Rather, it's only effect will be to restrict the rights of property owners like myself and certainly injure the property management businesses in Jackson who facilitate rental of homes like mine. If that is the case there is no reasonable basis for making this change. I urge you and the Council not to proceed with the proposed change.

Paul and Lynn George
PO Box 2051
Wilson, Wyoming 84014
Sent from my iPhone

Annette Langley

From: Chelsea Beets <chelsea.beets@gmail.com>
Sent: Wednesday, April 20, 2022 4:53 PM
To: Tyler Sinclair
Subject: Public Comment for 4.20.22 Planning Commission Meeting



Hello,

My name is Chelsea Beets, I am a 13 year resident who rents in Jackson, I do not own land or a home. I am against amending LDR Section 6.1.4.A.2 from 31 days to 90 days. I do not think doing so will have the type of impact on workforce housing and our whole community, as many believe it will. I would ask that before any decisions are made, a larger community discussion takes place surrounding these and other rental regulations to ensure amending current regulations will actually get to the goal of more workforce housing. It's also an opportunity to brainstorm other solutions.

Best,
Chelsea

Annette Langley

From: Lauren Marshall Scoll <lauren@abodeluxuryrentals.com>
Sent: Wednesday, April 20, 2022 6:09 PM
To: Town Council; Tyler Sinclair
Subject: Public Comment on proposed LDR for rental restrictions



Dear Planning Commission,

I'm writing to express my opinion on the Planning Commission's intent to enact a new Land Development Regulation that would prohibit any residential unit within the rental overlay to be rented for less than 90 days.

The ongoing housing shortage for the workers who are an integral part of this thriving community is a serious and worrisome matter which affects all of us as local business owners and residents.

There is little evidence however, that increasing rental restrictions in this way will actually contribute to housing options for the local workforce.

The matter of affordable housing needs more discussion and alternatives to the proposed rental restrictions should be considered before any changes are made. Specifically, answers to the following questions should be thoughtfully regarded:

- 1) What problem is being addressed by putting a restriction on rentals in this way?
- 2) How does enacting a 60- or 90-night minimum help to solve the lack of affordable housing?

As a member of the Jackson business community, I am committed to supporting the efforts to increase available housing for the workforce whether through monetary donations, volunteer hours, or other community involvement. But I do not believe that increasing the nightly stay minimums is the solution. Please consider opening the floor to more discussion before a final decision is reached on this matter.

Respectfully,

Lauren Marshall Scoll

--

Lauren Marshall
Abode Luxury Rentals
Park City: (435) 565-1555
Jackson Hole: (307) 264-1616
lauren@abodeluxuryrentals.com

Annette Langley

From: Kate Binger <katesjis@gmail.com>
Sent: Wednesday, April 20, 2022 9:27 PM
To: Tyler Sinclair
Subject: Rental regulations



Dear Tyler,

Please, I want this town to remain a community. I am in favor of the 30 day rentals to be pushed to a 90 day rental. We need this change for our town to stay a viable community.

Thanks,

--

Kate Binger
Designed Interiors, LLC
DBA: Dwelling
www.dwellingjh.com

1921 Moose Wilson Rd, Ste 102
Wilson, WY 83014
O: 307-733-8582
M: 307-690-5452



Think GREEN. Please consider your environment prior to printing this e-mail.

Annette Langley

From: John Fraser <jwf1960@gmail.com>
Sent: Thursday, April 21, 2022 5:12 PM
To: Tyler Sinclair
Subject: Rental term regulation proposal



Subject: Rental term regulation proposal

Dear Mr. Sinclair:

I am writing to express my objection to the proposed change to Teton County regulations regarding renting properties outside of the County/Town resort rental zones. I own property at 2055 Trader Road East in the Gros Ventre North association outside Jackson. Current County regulations allow County residents outside resort areas to rent their home once per 31 day period. While I understand and respect the goals associated with preventing short term rentals outside of specific, identified areas in the County, I firmly believe every County homeowner deserves the right to rent his/her home in order to generate income to fund the rapidly increasing costs associated with owning a home in the Jackson area, particularly property taxes. This is particularly true for owners who have owned their homes for extended periods of time and may not have experienced increases in wage/investment income commensurate with increases in the costs of home ownership. Many depend on rental income to ensure they can continue to enjoy all that this wonderful part of the world offers.

Increasing the non-resort area rental period from once every 31 days to once every 90 days would effectively prevent many County homeowners from generating such additional income. All this proposed change will do is benefit those homeowners in resort rental areas to the detriment of homeowners elsewhere in the County by forcing interested renters into more dense areas that may not offer the housing amenities they seek. This could in fact result in some renters seeking opportunities in other communities and detract from the value the Jackson area derives from such visitors.

I strongly urge those involved in voting on this proposal to consider the rights of all County homeowners as well as the impact this proposal could have on the number and composition of visitors to the valley and vote against making this change.

Respectfully,

John Fraser

Sent from my iPhone

Annette Langley

From: Davis Yates <dwyates21@gmail.com>
Sent: Tuesday, April 19, 2022 3:18 PM
To: Tyler Sinclair
Subject: Rentals

I support extending the minimum rental length for short term housing. I want our town to remain a community who lives here and doesn't just come for 2 weeks out of the year. Thank you

Davis Yates

Annette Langley

From: Jesse Brill <jbrill@naspp.com>
Sent: Thursday, April 21, 2022 10:37 AM
To: Tyler Sinclair
Subject: Rentals--Freedom of Choice



Please do not tramp on our property rights. Homeowners should have the right to rent their houses without government intrusion.

Thank You.

Jesse Brill

Annette Langley

From: Steve Lundberg <SLundberg@slwip.com>
Sent: Wednesday, April 20, 2022 8:56 PM
To: Town Council; Tyler Sinclair
Subject: Residential rental restrictions



To Planning Commission,

I'm writing to express my opinion on the Planning Commission's intent to enact a new Land Development Regulation that would prohibit any residential unit within the rental overlay to be rented for less than 90 days. I think that it is very important for Jackson to work hard to create more affordable housing, and on that front I am 100% in agreement.

Of course, all the interested parties who are suffering negative consequences of the current housing shortage, and especially those who can't find an affordable place to live, are looking for a quick fix to this problem. But common sense and even scientific studies tell us that the affordable housing problem won't be readably solved with the proposed requirement to lengthen the minimum stay requirement for Teton County.

In particular, reasons an "across the board" rental restriction will most likely make matters worse as opposed to improving the situation, for the following reasons:

1. Residential units such as luxury properties that currently rent at rates far above what is required to qualify as affordable housing will not suddenly be repurposed as affordable housing. Rather, this housing will either: 1) not be rented at all, depriving the Jackson community of the sales of goods and services these rentals would otherwise generate; or 2) shift to new rental strategies meeting the new minimum stay, such as renting for the minimum period at lower average monthly rates. Either way, no additional affordable housing is made available, and likely the value of these properties will be impaired and therefore their value will decrease. This will reduce property taxes and actually make it less possible for Jackson to finance new affordable housing using mechanisms like direct subsidies and Tax Increment Financing.
2. Housing currently being rented at a rate that might be considered affordable will only become more difficult to lease for the many seasonal workers due to the minimum commitment required.
3. Potentially there is some housing stock that is marginally affordable that may be forced to convert to service local, longer term rental demand, as it can no longer be rented for a month at a time, but the number of properties in this category may be minimal and do precious little to supplement affordable housing stock at the cost of lowering public tax revenues as the value of all properties affected declines across the board.

4. See the following study cited in the Harvard Business Review that recommends taking a well thought out nuanced approach to regulating property rentals due to demonstrated effect of reducing new development: <https://hbr.org/2021/11/research-restricting-airbnb-rentals-reduces-development>

Affordable housing is an important societal goal and I fully support the objective. The fastest track to this goal is likely best served by taxing short term rentals and using the taxes to help fund the public infrastructure required to build housing tailored to the need vs hope properties ill-suited to this need be repurposed.

As a result, I do not believe that increasing the nightly stay minimums across the board is the solution. Please consider opening the floor to more discussion before a final decision is reached on this matter.

Respectfully,

/Steven Lundberg/

Steven W. Lundberg

6638 Ryegrass Road

Jackson, WY

Annette Langley

From: Daniel Ewert <ewert02@yahoo.com>
Sent: Sunday, May 1, 2022 1:30 PM
To: Tyler Sinclair
Subject: Short Term Rental Length



Dear Town Planning Commission,

I oppose extending the minimum short term rental length. With increases in cost of living and taxes, homeowners who don't have a lot of cash flow will be further restricted from making any money off of their property to offset the increased costs. A homeowner who wants to camp/tent for 1 month to rent their place out and make a bit of money to offset costs would be harmed by this proposal, and there would be no resulting increase in available housing to anyone. Extending the short term rental length would be a gift to the big hotel and lodging industry. The 30 day length is appropriate as it is, and accomplishes the purpose of not having rapid turnover in any house outside the lodging overlay zone. Thanks for your consideration.

Daniel Ewert
307-264-0701

Annette Langley

From: Cody Pitz <cpitz715@gmail.com>
Sent: Tuesday, April 19, 2022 6:50 PM
To: Tyler Sinclair
Subject: Short term rental minimum night stay



Dear Mr. Sinclair,

I am writing you to show my support for extending the minimum stay of a short term rental from 30 to 90 days.

I live in a long term rental in East Jackson. I want to continue to live and participate in this community. I hope that by extending the minimum length of short term rental stays that Jackson can continue to house local people who work and live here. There are plenty of accommodations in town already and I question how many more tourists we can support.

It is also my hope that some extending the minimum night stay in a rental will discourage the development of proposed STR developments and potentially convert some current STRs into long term rental units.

We need these kind of progressive, local regulations to allow this town to support the community that we all care about.

Thank you for your time and work,
Cody Pitz

Annette Langley

From: Havson LLC <havsonllc@gmail.com>
Sent: Tuesday, April 19, 2022 5:28 PM
To: Tyler Sinclair
Subject: Short Term Rental to 90s Days



Tyler,

My name is Bobby Thomson and I own the Quiznos Sub in Jackson and want to express my support for moving the short-term rental period from 30 days to 90 days.

As a small business owner we need desperately housing for our workforce and this policy option as a market force will incentivize homeowners to rental locally.

I thank you for your time.

-Bobby Thomson
Owner, Quiznos Sub

Annette Langley

From: lizzievotruba@gmail.com
Sent: Tuesday, April 19, 2022 3:21 PM
To: Tyler Sinclair
Subject: Short Term Rental vote



Tyler,

My name is Lizzie Votruba. I am a local resident, worker, and homeowner in downtown Jackson.

I am writing to express my support in extending the minimum rental length for short-term rentals from 30 days to 90 days.

I want my neighborhood to remain a neighborhood and not become a hotel. I want to have a chance to live where I work—there are plenty of lodging options in town for visitors. I want to restore short-term rental units to the local rental market.

Thank you for your hard work.

--

Lizzie Votruba

(216) 870-4688

lizzievotruba@gmail.com

Annette Langley

From: Trissta Lyman <trisstalyman@gmail.com>
Sent: Wednesday, April 20, 2022 12:46 PM
To: Tyler Sinclair
Subject: Short Term Rental



Hi Tyler,

I am emailing to show support for extending the minimum length of short term rentals from 30 days to 90 days. We have enough hotels in town and out at the village to accommodate travelers and tourists. I do not think short term rentals are needed period. However, if they are to be here, I would encourage them to be at a longer term to accommodate housing for traveling, nurses and other professionals, if they choose to have them. I support affordable housing for local workforce.

Thank you,

Trissta

Annette Langley

From: Connor Phillips <phillycondor@gmail.com>
Sent: Thursday, April 21, 2022 9:52 AM
To: Tyler Sinclair
Subject: Short Term Rentals

Hello,

I'm writing to in regards to short term rentals in town. As a volunteer firefighter, I aim to provide essential services to our community. This community that I invest so much time, energy, and, at times, my life to continues to change. Change in the wrong direction, in my opinion. Yet changes that, with proper action from elected officials, may become undone. One way to help get our community back on track is to discourage short term rentals, thereby providing additional homes for the local workforce. Please, extend short term rentals to a minimum 90 day occupancy. I do not want to be a firefighter exclusively for visitors from afar. I want to serve and protect our community and our community has to live here in order for that to happen.

Best,
Connor Phillips

Annette Langley

From: pschrey@aol.com
Sent: Monday, May 2, 2022 5:59 PM
To: Tyler Sinclair
Subject: short term rentals



-----Original Message-----

From: MAILER-DAEMON@aol.com
To: pschrey@aol.com
Sent: Mon, May 2, 2022 4:50 pm
Subject: Failure Notice

Sorry, we were unable to deliver your message to the following address.

<tsinclair@jacksonwy.gov>:

No mx record found for domain=jacksonwy.gov

----- Forwarded message -----

Dear Sir,

We have owned our home in Jackson for almost 20 years. We are getting close to retiring as we are now in our late seventies and have worked our whole lives. We have been looking forward to spending more time in Jackson in our home. That dream may not become a reality for us if you pass the 90 day rental rule. We will not be able to maintain our home with the rising prices of upkeep and now higher property taxes. We have never taken advantage of the 31 day rule. We were at one point falsely charged with a misdemeanor for not obeying that rule, which caused us quite a bit of mental anguish. That charge was dropped because it was entirely false, and I considered it a malicious prosecution and a witch hunt. Before you pass such a law, please be sure the complaints you are getting are valid and not just false accusations.

We rely on the income to keep up with the rising costs in Jackson. Our home is not continually rented. It is not a revolving door rental. We keep our house well maintained and our guests are thoroughly checked out by The Clear Creek Group.

Please consider the homeowners that own these homes, too, not just the complainers.

Thank you for taking the time to read this.

Thomas and Patricia Schrey

Annette Langley

From: Alexandra Munger <alexandra.munger6@gmail.com>
Sent: Tuesday, April 19, 2022 8:11 PM
To: Tyler Sinclair
Subject: Short term to long term rental support

Hi,

My name is Alexandra Munger and I support the change to extend the minimum length for a short term rental to a long term rental from 30 days to 90 days.

I am a Jackson local, working for a local property management/remodel design company. I have been in Jackson for five years now and 2 of those years with my now husband who is self-employed here in Jackson. He runs a snow removal and landscaping business that started just 2 years ago. We are losing our housing at the end of May due to the owners selling.

Our town does not need anymore tourism. I believe we have enough full time residents here to keep this town running. We have plenty of lodging options for tourists as is.

As a local, I have dreamt of making a life here with my husband and starting a family. That opportunity is feeling less promising with limited housing options, rent increases and a market inflation.

Sincerely,
Alexandra Munger

Annette Langley

From: Skye Schell <skyeschell@gmail.com>
Sent: Wednesday, April 20, 2022 10:06 AM
To: Tyler Sinclair
Subject: Short-term rental comments / local worker and owner-occupied exemptions



Dear Tyler, Planning Commissioners, and Town Councilors:

I just reviewed the staff report re: short-term rentals and would like to comment as a resident and homeowner. Thanks for all your work on this topic!

In general, **I support tightening the rules on short-term rentals, such as by increasing the minimum stay** from 30 to 90 or more days. When short-term rentals take homes out of the pool for local workers, they contribute to our housing crisis and make it harder for our community to function.

I would also request two important exemptions, one similar to an idea in the staff report, and the other new:

1. Local worker exclusion: local workers should be able to rent rooms or apartments for any length of time. As someone who has rented long term, with many roommates, we have often had situations where someone is between rentals and needs a place for a month or even a couple weeks. This should not be illegal. (I understand this is difficult to enforce, and I would suggest that proof of local work only be required if enforcement is triggered by complaint.)

2. Owner-occupied exclusion: I strongly support an exemption for owner-occupied homes. I got lucky with amazing landlords who sold me the house I had rented long-term, with seller financing (something I hope more sellers do). Given the incredibly high cost of living here, and how it continues to increase, being able to occasionally rent a room or house for a short timeframe (like a week) would help me afford to stay in the house in general. I know there are many others in similar situations. I would recommend as little red tape as possible. Please continue to consider this part of long-term use (not short-term with fees, lodging tax, etc) since it is not a standalone lodging use but just part of the owners affording to stay in their home.

Here are my comments on the categories raised in the staff report:

- Eligibility: keep this wide: require **owner occupancy for 9 months** (not 10 - to allow for teachers or seasonal workers to travel); **do not require a set number of hours per week or year** or if you do, keep it low (again, to allow for the variety of work that people do here / having to do some work elsewhere)
- Exclusion: allow owners to (A) rent rooms to **local workers unlimited times** for any length of time (this would be covered under the "local worker exclusion"), and (B) rent rooms/apartments to anyone **4-8 times / year for any length** (no 30-day minimum)
- Permitting: owners should **only need to get a permit once**, to prove eligibility, and then include that permit info on rental listings. This would decrease hassle for owners and decrease burden on staff. Permit fees should be as low as possible.
- Renters: see above - unlimited rental to local worker renters, limited rental (4-8x/year?) to unlimited renters

I understand that adding exemptions makes the program more complicated and harder to enforce. However, it would also make local renting and owning more possible for people who are just barely breaking even (either renting or owning).

Thank you for considering my comments - I'm happy to share / talk more if you'd like.

Take care,
Skye

--
Skye Schell

Annette Langley

From: aburton@wyoming.com
Sent: Monday, May 2, 2022 11:49 AM
To: Tyler Sinclair
Subject: Short-term rental extension



RE: Short-term rental extension

Attention: ***Town Planning Commission***
tsinclair@jacksonwy.gov

- Please extend the minimum short-term rental length!
- Neighborhoods are for neighbors!
- Extend short-term rental lengths: people over profit!

Hello members of the Town Planning Commission,

My name is Angela Burton and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of its old self, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real pain when it comes to housing security. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Thank you for your consideration!

Sincerely,
Angela Burton

38 year Teton County resident
POB 13100 83002

Annette Langley

From: Jaclyn "JJ" Jaroch <jjinth northwest@gmail.com>
Sent: Tuesday, April 19, 2022 3:20 PM
To: Tyler Sinclair
Subject: Short-Term Rental Minimum



Good afternoon, I'm writing you to comment that I support increasing the short-term rental limit from 30 to 90 days. The blight of short-term rentals in communities across the world needs to be addressed as one of the significant factors limiting affordable workforce housing. I'm sure I'm not alone in starting that I want to have a chance to live where I work—there are already plenty of lodging options in town for visitors. (And new hotels being built or expanded upon every year.)

I want to see Jackson work to restore short-term rental units to the local rental market.

Thank you for your time & work.

Jaclyn "JJ" Jaroch

Annette Langley

From: Ryan Dorgan <rpddorgan@gmail.com>
Sent: Wednesday, April 20, 2022 12:37 PM
To: Tyler Sinclair
Subject: Short-term rentals



Tyler,

I'm writing to express support for the staff recommendation to update the current short-term rental minimum occupancy length from 31 days/1 month to 90 days/3 months. I hope that this change results in more rental units available to the local workforce as well as more efficient and effective enforcement of short-term rental regulations.

One concern that came to mind is that this change could simply shift this segment of short-term rentals from tourists and remote workers to those remote workers willing to commit to a three-month stay. This situation could incentivize rental managers to price the units above what many local workers - both seasonal and year-round - could afford.

Thank you,
Ryan Dorgan

Annette Langley

From: Matthew Russman (Gmail) <matt.russman@gmail.com>
Sent: Wednesday, May 4, 2022 2:36 PM
To: Tyler Sinclair
Cc: Lisa Russman
Subject: Town of Jackson Planning Staff Meeting - May 4



Dear Mr Sinclair,

I am a new homeowner in the Hidden Hollow development in downtown Jackson. I am writing to provide my input regarding the potential amendment to the Land Development Regulations to limit homeowner rentals to a minimum of once every 91 days.

I recognize that a lack of affordable housing in Jackson is forcing too many workers to drive from Victor or Alpine, exacerbating traffic congestion, generating air pollution and harming wildlife. Although I share these concerns, I am also deeply concerned about the impact of this proposal on private property rights.

We purchased our home with the intention of living there as well as traveling and renting it periodically to tenants. The existing rental limitations, which are already highly restrictive, were incorporated into our estimation of the property's cost and value.

To change these rules now, the Town of Jackson should meet a high burden of proof regarding the value and effectiveness of any new limitations. However, I am extremely concerned that our property rights will be impaired even though no research or data has been presented to demonstrate how these new rules would ease traffic, improve affordable housing availability, or achieve any other community goals.

It is irresponsible to change a law that infringes on our property rights without any evidence that it will make a difference in the problem you're trying to solve. A better solution is an amendment to the LDR's to allow for more higher-density workforce housing (higher FAR) — this is a straight-forward solution to a problem.

Sincerely,
Matthew Russman

Annette Langley

From: Leigh Chrisinger <leigh@jacksonholepm.com>
Sent: Wednesday, April 20, 2022 1:49 PM
To: Tyler Sinclair
Subject: Town Planning Meeting



Hi Tyler-I wanted to send an email before the evening's Planning Meeting. I am sure you have heard from others in my industry, but I would love to understand what the proposed law hopes to do and maybe that's something that will be addressed today? Would your group benefit from hearing numbers from businesses like mine or having an open dialogue? We would love to help make a positive change that helps the community as well as doesn't negatively impact an industry.

I own property in Teton Co and with the increase in property taxes in conjunction with not having the ability to rent my home for a month at a time...to help pay for constant property cost increases is very scary for many local types. Teacher friends and others in the community who use that ability in order to keep their properties...are concerned about what the future holds here in JH in many ways.

Thanks in advance for your input and information...I appreciate your time!

My best,

Leigh Chrisinger

Annette Langley

From: Kahlynn Huck <kahlynnmarie@gmail.com>
Sent: Tuesday, April 19, 2022 8:14 PM
To: Tyler Sinclair
Subject: year-round local AGAINST 90-day rental ordinance



Hi Tyler,

I'm a member of ShelterJH and County ISWR Board Member and I care deeply about housing in Jackson. However, extending the minimum rental length from 30 days to 90 days for homeowners is NOT a solution and is harming well-intended homeowners like my family.

My husband and I have lived here for 5 years and we have a 1.5-year-old daughter. We still have not been able to get her into a single daycare because of the enormous influx of new families to Teton County. (I'm currently 218 on a waitlist! Crazy!) We have no other family here. Because of this, we take a break and spend a month each season (twice a year) back at our parents house to have childcare help. During those times, we'd love to be able to rent our home rather than have it sit empty. One time we left for a month and had a friend rent our house for those 30 days because she was in between two leases here in Jackson. It was a huge help to her and it was helpful for us. Locals helping locals! If we were to move to 90-day minimum rental restrictions, it eliminates things like this as a possibility. I have another friend who is renting a place for a month this summer because she lost her housing and is again in between two places. With the 90-day ordinance in place she wouldn't have been able to rent a place for just that month she needed. 90-day rental ordinances aren't going to help keep communities "communities" - it's just going to make it tougher to find places in a pinch and it disallows locals rent their homes to other locals.

In my opinion, the way we currently have it, 30-day rental minimum is FAIR to homeowners and FAIR to the community. Homeowners occasionally offering their place up for a 30-day rental when they're out of town isn't turning the neighborhood into a hotel. We don't need more regulations on well-intentioned single-family, year-round homeowners. Extending to a 90 day minimum rental would eliminate my ability to rent to a local in need for 1 month at a time. It's forcing another empty house in a neighborhood that would have otherwise been filled and helping a fellow local.

Thank you for all you do and for considering what the public has to say. I appreciate and admire the work you're doing!

Best,
Kahlynn

Kahlynn Huck
414.526.6090
[LinkedIn](#)

Annette Langley

From: Evan Huck <evanhuck@gmail.com>
Sent: Tuesday, April 19, 2022 8:17 PM
To: Tyler Sinclair
Subject: year-round local AGAINST extending rental restrictions to 90 days



Hi Tyler,

Evan Huck here - local of 5 years living in East Jackson year round in a single family home. First - having watched you speak on the housing crisis, comprehensive plan, and zoning strategy - I appreciate your data-driven and logical approach to planning, and I trust you and the town planning commission will apply the same reasoned approach to this important issue.

I DO NOT support extending rental restrictions from 30 to 90 days. For context, I am a ShelterJH supporter -- I generally support Shelter's broader goals and appreciate their urgency, and agree with many of their specific proposals outlined in their [temporary development moratorium](#). However, I think the proposal to extend rental restrictions from 30-90 days is inaccurate and ineffective in achieving its intended goal (making rentals more accessible/affordable for local workforce).

You'll obviously be much more familiar with the actual data/research, but my concerns/questions about the theory that extending the restriction from 30-90 days are as follows:

- 1) single-family home rentals that are currently restricted at a minimum of 30 days represent a small fraction of the overall tourist accomodation picture. There are a lot of units (more being built) that are truly "short-term" (ie you can rent for 2 nights). It would likely make a much bigger impact on the intended goal to extend the restriction on this category of housing/units from 0 to say 14 days, then it would to extend the units currently minimumed at 30 to 90 days. Why is this group of no-minimum short-term rentals exempt from the focus? For example, b/c of our zoning, houses about 100 yards from us on Snow King Ave (we're on Karns) can be rented out for 2 nights. Yet we're considering leaving no minimum for those units and increasing our minimum from 30 to 90 days?
- 2) Increasing the minimum from 30 to 90 days makes it harder to rent to the local workforce. There are a lot of locals (particularly in shoulder season) that are often between longer-term housing. Renting to a local for 30-60 days might help that local extend their timeline for finding a more permanent option rather than moving away.
- 3) Not all homeowners are 4th-house owning billionaires. We worked very hard to buy a very reasonable-priced house 5 years ago. We still work very hard to make it work here. If we want to go visit our parents for a month or two months, we should be able to earn income on the property we own (rather than just have it sit empty) to help us be able to stay and live here.

Thank you for your consideration.

Evan Huck

Annette Langley

From: JP Carey <jpcarey4@gmail.com>
Sent: Wednesday, April 20, 2022 8:45 AM
To: Tyler Sinclair
Subject: Development Proposal in town



Hi Tyler,

I wanted to write you to say I am in support of extending the short term rental of the new development in town from 30 to 90 days. Our town desperately needs to keep its workforce here and I believe the shorter rental options they have, the fewer ways we will keep them here. We have enough short term rental opportunities and not nearly enough long term solutions. While 90 days is still too short, it is a start. Thanks for reading,

Best,

JP

Annette Langley

From: Julia Olson <olsonjulia15@gmail.com>
Sent: Wednesday, April 20, 2022 8:55 AM
To: Tyler Sinclair
Subject: Extend minimum short term rental length



Hello Mr. Sinclair,

I hope this email finds you well. I am a Wilson resident and local educator and volunteer. I am writing in support of the extension of the minimum length for a short term rental from 30 to 90 days. I live in workforce housing on Moose Wilson Rd with my partner and a roommate, and I feel so lucky both to have housing I can afford, and to be surrounded by folks that actually work in Jackson and are active members of the community. Of course, like everyone in Jackson, I have seen dear friends and key community contributors have to leave their jobs and move away from Jackson due to the housing crisis.

Extending the short term rental length will help reduce the stress tourists place on our housing, and open up more housing options for the folks who make our community work: servers, teachers, nurses, grocery store workers, bus drivers, tour guides, and more. Three months is likely longer than a tourist will stay, but **three months can serve as a lifeline between long term housing situations for working folks, and can make the difference in helping people remain in our community.**

I hope you take this into consideration this evening with the Town Planning Commission.

Thank you!

Julia Olson
1751 Moose Wilson Rd, Wilson

Annette Langley

From: Anna Sullivan <annasullivanphotography@gmail.com>
Sent: Wednesday, April 20, 2022 6:22 PM
To: Tyler Sinclair
Cc: Anna Sullivan
Subject: Extend Short Term Rentals

Dear Mr. Sinclair,

I am writing you this evening to beg you to please support extending the minimum rental length for short-term rentals from 30 to 90 days.

I want my neighborhood to remain a neighborhood and not become a hotel or have visitors in and out constantly. We need to keep our community solid and it's being lost on a daily basis. We are losing the soul of Jackson Hole.

Thank you for your consideration.

All the best,

Anna C. Sullivan
Jackson Full-Time Working Local Resident

Annette Langley

From: David Hinck <davidhinck@gmail.com>
Sent: Wednesday, April 20, 2022 12:50 PM
To: Tyler Sinclair
Subject: Extend the minimum short term rental rate

Tyler,

I know extending the minimum short term rental rate may sound like it's encroaching on certain rights or Freedoms, but I want you to know my story. Real estate agents raked in a killing telling buyers throughout Covid pandemic that they could get around our short term rental rules by leasing their house out through Airbnb or vrbo for a specified amount under 30 days. I over heard them while they were showing the house I had rented for two years. My house on Aspen drive was bought by a californian and I was forced to move into the abyss of no housing while he makes money off the community I've lived and worked in for 10 years. Please extend the minimum and get housing back to workers and not rich out of staters trying to use our work force housing as an investment tool!

Regards,

-Dave Hinck

Ps- excuse any typos because I'm typing on my phone. If you have time and want to hear details 618 835 8340.

Sent from my iPhone

Annette Langley

From: Chris Perkins <perkinw@gmail.com>
Sent: Wednesday, April 27, 2022 1:07 PM
To: Tyler Sinclair
Subject: Extending Minimum Short Term Rental Length



Hi Tyler,

My name is Chris Perkins and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County—in my case having to relocate homes multiples times and watching good friends lose stable housing after being unable to afford rent increases.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

Best,

Chris Perkins

Jackson, WY

(206) 303-7315

Annette Langley

From: Miles Yazzolino <yazzojazz@yahoo.com>
Sent: Wednesday, April 27, 2022 6:57 PM
To: Tyler Sinclair
Subject: Extending Short Term Rental Length to Preserve Our Housing in this Community

Hello Tyler and members of the Town Planning Commission,

My name is Miles Yazzolino and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County.

I've seen too many of my friends, my mentors, my teachers, my own family pushed out of this valley by unsustainable housing price increases and an influx of very short term renters able to pay top dollar. Compass Jackson Hole's reports of a 45% year over year increase in the median housing price here is startling, and will result in more homes sitting empty most of the year while hosting guests a few days a month. That is why it is so crucial to extend the minimum length for a short term rental from thirty days to ninety days, while also allowing homeowners who live in their homes at least 10 months/year to rent short term to help make ends meet.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of its old self, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real pain when it comes to housing security. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Sincerely,

Miles Yazzolino (he/him)
24 year Teton County resident and ShelterJH Member

Sent from Yahoo Mail on Android

Annette Langley

From: Andrew Ward <andrewward01@yahoo.com>
Sent: Wednesday, April 20, 2022 8:56 AM
To: Tyler Sinclair
Subject: Extending the short term rental

Hello,

I am in favor or extending the short term rental from 30 to 90 days. As a small business owner it's tough to watch what is going on in this town/ valley. I know of a lot of people who are breaking these rental rules already. I would like to not only see this changed but also policed. It would be great for a way for residents to have a good way to report. If there already is I apologize I just don't know how to.

Thanks,

Andy Ward
Owner Hatch and Reward property management
484-437-7577

Annette Langley

From: Julien Hass <julien.hass@gmail.com>
Sent: Wednesday, April 20, 2022 9:29 AM
To: Tyler Sinclair
Subject: Extension of short term rental time period



Good morning Tyler,

I am writing to voice my desire for you to extend the minimum length of short term rentals from 30 to 90 days. It is important to do so for the town of Jackson in order for many employees to be able to find a place for 3-4 months, which is often the time necessary for an individual or family to find an acceptable place to live, in or near Teton County.

I also believe extending the "short term rental" period from 30 to 90 days, at the very least, may help alleviate the seasonal employee housing crunch, especially during the summer. Many seasonal employees during the summer are only here for 3-5 months, and have no issues living in a potentially higher priced rental. I strongly believe extending the short term rental time period can help both seasonal employees and long term locals, and benefit businesses as well. Some local business owners may own short term rental units or may want to and this extension can help them house some employees during the summer/winter high period, and may help alleviate some stress, both for employees and employers.

Have a good day!

Julien Hass
julien.hass@gmail.com
307 920 0747

Annette Langley

From: Jill Callahan <jillcallahan@gmail.com>
Sent: Wednesday, April 20, 2022 12:52 PM
To: Tyler Sinclair
Subject: Feedback on extending minimum short term rental length to 90 days



Dear Tyler,

I urge you to extend the minimum length for a short-term rental from 30 days to 90 days. This will immediately make more homes available for locals.

Please restore short-term rental units to the local rental market.

Respectfully,
Jill Callahan

--

Jill M. Callahan
781.910.1045

Annette Langley

From: Ariel Kazunas <akazunas@gmail.com>
Sent: Wednesday, April 20, 2022 5:49 PM
To: Tyler Sinclair
Subject: In Favor of Extending the Minimum Length of Short Term Rentals



Hi there -

My name is Ariel Kazunas. I am writing tonight to offer my support of the proposal being considered by the Town Planning Commission to extend the minimum length for a short-term rental from thirty days to ninety days.

We are all affected by the current and ongoing housing crisis in Teton County and its surroundings, whether we have lived here for four generations or four months, whether we own several properties or are struggling month to month to make rent, whether we choose to live out of vehicles to cut costs or are experiencing undesired houslessness.

Addressing said crisis with positive and proactive change only improves our collective character, by ensuring a diversity of residents, with the many talents, ideas, professions and passions they possess, can remain here to strengthen and add richness and depth to our community. (That, and plow our roads, teach our children, nurse our suffering, unclog our drains, stock our stores, treat our water, respond to our emergencies, etc...)

Extending the minimum length for a short-term rental to ninety days would increase the likelihood that existing rental units in Jackson might become available to locals, rather than tourists. It would ensure that my vibrant neighborhood (and other neighborhoods like it) remains intact, rather than becoming, effectively, due to the allowance of thirty day short-term rentals, blocks upon block of, effectively, small hotels.

And, lastly, extending the minimum length for short-term rentals to ninety days would mean that I, my coworkers, my friends and my neighbors will continue to have a chance to live where we work, and will therefore be able to continue to contribute to the betterment of our community overall. There are SO many hotels, luxury condos, and short-term rentals already available for tourists in Teton County; housing within city limits, where there is access to public transit options and where residents are in proximity to business / employment hubs, should be prioritized as much as possible as for locals.

Denying folks from different socioeconomic backgrounds the chance to experience housing security because we are blindly committed to and focused on some short-term rental bottom line is unbelievably inhumane. It also shoots us ALL in the foot: at some point, there will come a day when this town is a shell of its old self, unable to regenerate and flourish as its younger, less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met.

It hurts (honestly almost physically) to watch as long-term rental after long-term rental gets torn down here in East Jackson, to make way for designer homes that are most often purchased by property management companies looking to increase their short-term rental offerings. I lose neighbors nearly every month to this devastating trend, and there doesn't seem to be anything I can do about it. We have apparently decided to put profit before people in Jackson, and we, the people, bear the brunt of the ensuing consequences.

As I have said in letter after letter to the County Commissioners, to the Town Planning Commission, to the Town Councilors, I, and folks in this community like me, WANT to be the neighbor who will lend you a cup of sugar. But we need a roof under which to store that sugar first.

Lengthening short-term rental minimums is a very small step in the right direction when it comes to addressing the housing crisis here in Teton County. I recognize that it might not preclude the very wealthy from renting a home for ninety days even when they only plan to be present for thirty of them; I also recognize that it does not address the need for enforcement of this change to have any real effect. That said, it is still a step, and better it be forward than not at all.

All my best, and thank you for your time,

Ariel Kazunas

8 year Teton County resident

Current East Jackson resident

Future ex-Jackson resident if we do not collectively choose to put people before profit and community first.

Annette Langley

From: Liz Lynch <elizabethnlynch@gmail.com>
Sent: Wednesday, April 27, 2022 7:49 PM
To: Tyler Sinclair
Subject: In support of extending the minimum short-term rental length



Good evening, members of the Town Planning Commission,

My name is Liz Lynch, and as a resident of Jackson for 3 years (previously, of similar outdoor resort towns in Idaho and Montana), I'm writing to you in support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty (30) days to ninety (90) days.

We are all affected by the current and ongoing housing emergency in Teton County. Personally, in addition to my own housing security concerns, I've seen how the replacement of longer term rentals for locals by short term rentals has negatively impacted our ability to sustain a local workforce. I work for the U.S. Forest Service, and in a position that had 40+ applicants for two positions, we were only able to hire one person, because multiple others had to decline, citing the lack of suitable housing options. The future is grim if we can't find ways to offer housing to seasonals for at least 3 months (usually more like 4-6 months) at prices they can afford on a government salary or internship stipend. I worry about what that means for the future health of our Forest and public lands in and adjacent to our town, if the boots on the ground tasked with making good work happen are priced out for good.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already many lodging options for tourists in and near Teton County. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

This change is by no means a silver bullet— but it would make a statement that our priority is to our community, our neighbors. Supporting this change would be a wonderful first step in the right direction.

Thank you for your time and consideration.

Sincerely,

--

Liz Lynch

C: (908) 803-2998

Annette Langley

From: Estela Torres <etorres0104@gmail.com>
Sent: Wednesday, April 20, 2022 10:06 AM
To: Tyler Sinclair
Subject: 30 day rentals

Dear Tyler:

I am in favor of keeping the rental period of 30 days. There are many people who abide by the rules and rent their residences when they are away for a month. I, for one, have rented to people who are working in Teton County and need a temporary place to stay while they secure more permanent lodging; and i know of other people who do the same. This 30 day rental supplements income to locals who need it in order to live in this expensive town and pay exorbitant property taxes because of the high end real estate.

Thank you.

Sent from my iPhone

Annette Langley

From: Ash Hermanowski <ash.hermanowski@gmail.com>
Sent: Wednesday, April 20, 2022 6:40 PM
To: Tyler Sinclair
Subject: Increasing STR Minimum



Hi Tyler,

I'm writing to voice my support of increasing the minimum short term rental length to 90 days.

As someone who lives in the Aspens, I have seen how short term rentals have ruined neighborhoods. Simply put, I don't have any neighbors. Airbnb guests check in and out every day. I can hear rental car alarms going off at all hours of the night. House parties. You name it. We've already lost this neighborhood, but maybe that doesn't have to be the case for others in the area.

I want to RESTORE these short term rentals back to the rental market for locals. If people can't afford to pay their taxes or pay their mortgages because they spend "winters and summers" here, that's not our workforce's problem. We live here, we work here, we should have access to this housing. I don't want this decision to be swayed by homeowners and businesses who benefit to gain huge profits, or at least benefit Second homeowners in order to keep their little slice of Jackson.

I want a chance to keep living where I work. Why would we continue to prioritize the super privileged in our community instead of those who need housing?

Other mountain town communities have implemented measures like this and it has been very successful. I hope this is approved.

Thank you.

--

Ash Hermanowski
she/her/hers
c: 802-585-4061

Annette Langley

From: Phil Stevenson <phils@tccgjh.com>
Sent: Wednesday, April 20, 2022 5:52 PM
To: Tyler Sinclair
Subject: Increasing the Minimum Rental Period for Properties Not In the Lodging Overlay from 31 to 90 Days



Mr. Sinclair and Staff,

I am writing to voice my strong opposition to increasing the minimum rental period from 31 to 90 days for properties not in the Lodging Overlay, for the following reasons:

- The underlying premise of this proposal, though unstated as such, is that Renters Are Bad, bringing unwanted noise and bad conduct to the valley. In my experience this is simply not true, as most guests are here for the same reasons we are: natural beauty, abundant wildlife, and unparalleled outdoor recreation. If they want to raise hell, they can do that back home without going to the expense of coming to Jackson.
- The proposed changes would certainly decrease the number of guests renting in Town, but if the belief is that more homes would be then used for worker rentals, there would be no diminution of traffic or demand for Town services.
- Most rentals occur in the summer, so arguably under the current proposal there might be one rental that encompasses July, one that encompasses August, and one that includes most of ski season. While we certainly have seasonal workers, this likely rental pattern would preclude seasonal rentals and besides, most residents of the valley are looking for at least a one year lease.
- With the advent of the acceptability of remote working, we are seeing more guests who want to spend 30 or so days here. Ninety days would preclude most guests, however, especially those with school age children.
- Rather than address possible benefits to the community if the proposed changes were to be adopted, most of the staff report is spent lamenting the onerous requirements on staff time and effort. Respectfully, public policy should not be driven by its impact on Town administration. Even so, the challenges appear to be overdrawn, with a prime example being the statement that there have been approximately 50-70 complaints about short term rentals since 2017. This equates to an average of about one such complaint a month, which on its face should not be unduly burdensome.
- Whatever happened to Wyoming being a state that respects and values individual property rights?

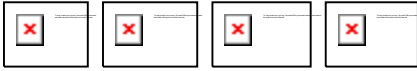
In conclusion, there has been a sea change in the type of lodging people desire since the Comp Plan was written in 1994, away from the old hotel model and towards the rental of private homes, providing much needed income to the property owner and a much better guest experience, especially for families. Our local economy is largely built on visitors seeking this type of accommodation, and it would not be good public policy to discourage them from coming to our valley.

Phil Stevenson

Phil Stevenson | *Partner* | *Responsible Broker*

Office (307) 732-3400 | Direct (307) 732-5922 | Cell (307) 690-3503

120 West Pearl Avenue, Jackson, Wyoming 83001
PO Box 10609, Jackson, Wyoming 83002



Annette Langley

From: Howard Garber <howardgarber@sbcglobal.net>
Sent: Thursday, April 21, 2022 12:58 PM
To: Tyler Sinclair
Subject: JHLA Agenda 4/20/22



Dear Tyler,

I was informed about the Town of Jackson Homeowners' Rental discussions of last night at about the time the discussions were taking place. I was unavailable at that time to participate due to previous obligations. So my apologies to you for my tardiness and I hope that I can add some constructive points to last night's discussions, if possible.

Let me begin by saying that I have considered and am sympathetic to both sides of the argument; the need to provide housing for an increased work force and the concern of homeowners for home value dilution. As such, I would like to suggest a solution to this concern that comprises both concerns. To wit, keep the homeowners' right to rent for thirty days or less intact with no alteration. For simplicity and clarity, let's call the homeowners' who have been renting through this process for years, Group A. To accommodate the needs of the town for additional worker housing a second group of real estate properties could be formed, let's call this Group B. Group B housing would be composed of those properties whose owners wish to rent their units to a less traffic-ed, more consistent renter that probably won't deteriorate the property as much as the transient flow-through of the very short term renter. If the town of Jackson feels that it needs to assist the workers in establishing a base or cap rental price or if the town feels it should become a conduit for workers to obtain Group B housing through businesses it could establish an agency to oversee and assist in this valuable need.

I hope that this email gives you an overview of my vision for a prosperous Town of Jackson real estate plan. I again apologize for the presentation tardiness. I will be very happy to provide further detail should you seek that. Please contact me at: e mail, howardgarber@sbcglobal.net or preferably 312.933.6130.

Respectfully,

Howard B. Garber

Annette Langley

From: Matt Schebaum <matt.schebaum@vacasa.com>
Sent: Wednesday, April 20, 2022 1:37 PM
To: Tyler Sinclair
Subject: Minimum Rental Length for Short-Term Rentals



Dear Tyler,

I wanted to reach out and express my opposition to extending the minimum rental length for short term rentals from 30 to 90 days. I hope you can pass along this information for the Councilors to review before any vote.

While I understand the sentiment and overall housing situation in Jackson (I've lived in the City of Jackson for 10 years), stricter regulations on short-term rentals is a slippery slope that may have unfair or unintended consequences on many stakeholders, including homeowners, without much effective benefit to Jackson residents.

First, it should be carefully examined whether extending the minimum will have any real effect on the availability of long term housing and not just weigh on homeowners unequally.

Second, among the core rights that a property owner has is the right to lease or rent the property. This right has long been recognized by the courts. For example, the Supreme Court of Connecticut has explained that the "right to rent" is one of the important "sticks" in the bundle of property rights, stating: [It] is undisputable that the right of property owners to rent their real estate is one of the bundle of rights that, taken together, constitute the essence of ownership of property.... Owners of a single-family residence can do one of three economically productive things with the residence: (1) live in it; (2) rent it; or (3) sell it. The inherent nature of this right to rent is supported by a leading treatise, Thompson on Real Property, which observes that "the right to lease property is an incident of ownership."

Short-term rental regulations can infringe upon this fundamental property right in many ways, including (1) outright bans on short-term rentals, (2) licensing requirements, and (3) mandatory inspection requirements.

Third, while most short-term rental regulations are adopted as a general regulation under the local government's "police power," some communities have instead chosen to regulate short-term rentals under their zoning code. The problem with this approach is that the regulation of short-term rentals does not fall within the scope of local zoning authority. The reason is that a key characteristic of local zoning power is the long-established principle that "zoning deals with land use, not the owner, operator, or occupant of the land."⁶ Zoning inherently pertains to land rather than to the landowner, or user—it "deals basically with land use and not with the person who owns or occupies it."

Zoning regulation of short-term rentals violates this fundamental principle in that it focuses not on the use of land, but on the form of one's interest in property (i.e., owner or renter) and the duration of the occupancy (e.g., short-term vs. long-term).

I hope this message will reach the councilors desk so as to consider all stakeholders and the effective consequences of more regulations on short term rentals in Jackson.

Thank you all for your time,



Matt Schebaum
Sales Executive

[Schedule a meeting with me](#)

m: 307-368-0034

vacasa.com

My favorite Vacasa destination is Maui, HI

Annette Langley

From: Jim Sulciner <sulciner@gmail.com>
Sent: Wednesday, April 20, 2022 6:40 PM
To: Town Council
Cc: Tyler Sinclair
Subject: New land development regulation



To Planning Commission,

I'm writing to express my opinion on the Planning Commission's intent to enact a new Land Development Regulation that would prohibit any residential unit within the rental overlay to be rented for less than 90 days.

The ongoing housing shortage for the workers who are an integral part of this thriving community is a serious and worrisome matter which affects all of us as local business owners and residents.

There is little evidence however, that increasing rental restrictions in this way will actually contribute to housing options for the local workforce.

The matter of affordable housing needs more discussion and alternatives to the proposed rental restrictions should be considered before any changes are made. Specifically, answers to the following questions should be thoughtfully regarded:

- 1) What problem is being addressed by putting a restriction on rentals in this way?
- 2) How does enacting a 60- or 90-night minimum help to solve the lack of affordable housing?
- 3) Our property tax has doubled since purchasing our home in 2020 why not use these new funds to build affordable housing?

As a member of the Jackson community, I am committed to supporting the efforts to increase available housing for the workforce whether through monetary donations, volunteer hours, or other community involvement. But I do not believe that increasing the nightly stay minimums is the solution. Please consider opening the floor to more discussion before a final decision is reached on this matter.

Respectfully,

Jim Sulciner

Annette Langley

From: noreply@civicplus.com
Sent: Wednesday, April 20, 2022 6:14 PM
To: Tyler Sinclair
Subject: Online Form Submittal: Email Tyler Sinclair



Email Tyler Sinclair

Email Content: Dear Mr Sinclair,

We purchased our new townhome in the Hidden Hollows development in Jackson with the intention to rent it for a few 30-day periods each year. This was part of our calculation in evaluating the affordability of Jackson versus other locations. The "once per 31 days" rule is already highly restrictive compared to every other town we considered in the US. We sincerely hope that the town does not make the rule even more restrictive than it already is.

Best,
Matthew Russman

Your Name: Matthew Russman

Your Company Name: *Field not completed.*

Your Phone Number: 646-872-3448

Your Email Address: matt.russman@gmail.com

Your City: Jackson

Your State: WY

Your Zip Code: 83001

Email not displaying correctly? [View it in your browser.](#)

Annette Langley

From: noreply@civicplus.com
Sent: Sunday, April 24, 2022 1:59 PM
To: Tyler Sinclair
Subject: Online Form Submittal: Email Tyler Sinclair



Email Tyler Sinclair

Email Content: This was returned from regular email, so I will send a copy here, Mr. Sinclair, through our Jackson website:

Dear Mr. Sinclair,

When my family purchased our home in Jackson, I was working full time, and nonetheless it was a stretch; we both know about property values here, even eight years ago when it was bought. Now retired, I rely on the income I am able to get from renting occasionally which supplements my Social Security. If we implement the proposed 90-day minimum stay, you will have shut me and my family down completely. It was already hard enough at 31 days, given that few vacationers want a home beyond two weeks.

While we seem to have a housing shortage, is zeroing in on this segment of our community the answer? The report from staff itself said on page 5 that "There is evidence that some residential units have been purchased to take advantage of these 12 rentals per year allowance." That is hardly the smoking gun one might want to prove the culpability of homeowners as the cause of a worker shortage, don't you think?

While we might want to stem real estate speculators from gobbling up properties that could house workers, do we want to punish our local population for the crime of owning their homes and paying their taxes, which, as you likely know, went up quite steeply this year?

If you feel you must implement this punitive and ill-conceived program, may I ask that you allow those who have already purchased be grandfathered in and exempted from the 90 rule?

As an admittedly exaggerated parallel, consider this alternative: the Town confiscates 10% of the rooms at the Four Seasons

and establishes a maximum rent of \$2,000 a month as affordable housing, thereby requiring this hotel to charge \$69 a night for those rooms. Maybe all the hotels, come to think of it.

It's unthinkable, but it is of the same sort of unjust strong-arm tactics by a government agency claiming control over personal property that was hard won through honest work. Do please consider.

Sincerely,

William Reinecke
687 E. Kelly Ave.
805-660-0505

Your Name:	William Reinecke
Your Company Name:	<i>Field not completed.</i>
Your Phone Number:	8056600505
Your Email Address:	timberlove@mac.com
Your City:	Jackson
Your State:	WY
Your Zip Code:	83001

Email not displaying correctly? [View it in your browser.](#)

Annette Langley

From: Amanda Flosbach <flosbacha@gmail.com>
Sent: Wednesday, April 27, 2022 3:05 PM
To: Tyler Sinclair
Subject: Please extend the minimum short-term rental length!



Hello members of the Town Planning Commission,

My name is Amanda Flosbach, and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County.

I myself am in temporary housing (thanks to a philanthropic friend) as I continue to look for a long-term rental or hope to purchase an affordable/workforce unit. I have been looking without luck since November of 2021. This will be my 11th move in 20 years of calling Teton County my home. I lost my most recent residence because the owner's remote working relative preferred to be in the guest cabin I inhabited. Over the years, I have moved from other homes as they were sold, demolished, or inhabited by owners' friends and relatives. As an experienced professional in the nonprofit arts, I regularly contribute to our community by creating education programs for youth and adults, by performing as a musician myself and by volunteering for community projects. Making a career of these contributions has come at a price: an income to afford me the ability to enter the free market as a homeowner in Teton County.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of its old self, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real pain when it comes to housing security. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Sincerely,

Amanda Flosbach
20-year Teton County resident
6225 N Spring Gulch Road (until June 30)
307-690-0628
flosbacha@gmail.com

Annette Langley

From: Adrian Croke <adrian.croke@gmail.com>
Sent: Thursday, April 28, 2022 4:18 PM
To: Tyler Sinclair
Subject: Please extend the minimum short-term rental length!



Hello members of the Town Planning Commission,

My name is Adrian Croke and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County. I've lost valuable friends and colleagues to other states due to the housing crisis, folk who would have otherwise joyfully continued to offer their volunteer hours, expertise, skills, money, and joy to Jackson. I can't help but feel that further limiting the number of short term rentals could have opened up more housing for those folks who were pushed out. I believe we need to be doing all that we can to combat the housing crisis, and extending the short-term rental minimum stay from 30 to 90 days could be an important part of the complex solution that we need.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of itself, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real struggle when it comes to housing insecurity. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Thank you for your work and your consideration of my thoughts.

Best,

Adrian Croke
10 year Town of Jackson resident

Annette Langley

From: Leslye Hardie <hardie.leslye@gmail.com>
Sent: Wednesday, April 20, 2022 9:11 AM
To: Tyler Sinclair
Subject: Please lengthen the time for s-t rentals

Dear Tyler,

Thank you for your never ending work to manage this small town where everyone has a strong opinion. Anything you can do to lengthen the time on rentals to protect more of our workforce would be greatly appreciated. Many thanks,
Leslye and David Hardie

Annette Langley

From: Charles Lynch <lynch522tw@gmail.com>
Sent: Wednesday, April 20, 2022 5:32 PM
To: Tyler Sinclair
Subject: Property rentals - Property Rights



From: Charles Lynch <Lynch522TW@gmail.com>

Date: April 20, 2022 at 4:19:48 PM MDT
To: tsinclair@jacksonwy.gov
Subject: Property rentals - Property Rights

Dear Mr. Sinclair,

As a property owner in Wilson and an owner in town, I am very much against the further erosion of our property rights as expressed in the redefining of minimum rental terms. It's a fallacy to think that eliminating short term property rentals will have a substantial positive impact on our workforce housing issue or on congestion. If the longer stay term were to pass, homeowners with simply charge a higher which people would be willing to pay in this market. Those who don't want to pay higher rates would simply stay at local hotels. Homeowners who offer short term stays most often spend a few months or longer in Jackson Hole. Very few, if any, what convert into year or longer leases. Even if they were to do so, it would be at a rate which people looking for affordable housing could not afford. If the town and county truly want to solve the affordable housing issue, they need to invest substantial money and efforts in collaborating with developers to create higher density projects. The LDR's need to be revised to incentivize these types of projects. And opportunities such as the north south park project need to be capitalized on in a expeditious and efficient manner. Going after short term rentals is a feel good option not an effective long term solution.

Many thanks for your time.

Charles Lynch

Sent from my iPad

Annette Langley

From: Phil Stevenson <phils@tccgjh.com>
Sent: Thursday, April 21, 2022 11:06 AM
To: Tyler Sinclair
Subject: Proposal to Extend Period for Minimum Rentals to 90 Days



Hi Tyler,

Prior to last night's Planning Commission meeting, I was uncertain as to the motivation behind the proposed extension of minimum rentals outside of the Lodging Overlay from 31 to 90 days, but the questions and comments at the meeting clarified that for me. For while community character and burden on staff time were mentioned, clearly the primary concern is whether such an extension would increase the availability of workforce housing. The individuals who commented in favor of the extension uniformly believe that the 90 day minimum would increase such availability, but in all likelihood it wouldn't. Why?

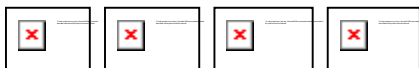
- Most renters are looking for the stability that comes with a rental of ideally a year, which wouldn't be possible whether a property had 30 day or 90 day rentals.
- Most properties impacted would need to rent at a number well in excess of what members of the workforce could pay.

We all are concerned about the lack of workforce housing, but the proposed change won't get us there. Rather, it seems like the proposal falls under the umbrella of "we've got to do something", but by passing this ineffective amendment, we run the risk of collectively taking our eyes off the search for real solutions, erroneously believing that we have done something to address the problem, when in fact, we haven't.

Phil Stevenson

Phil Stevenson | *Partner* | *Responsible Broker*

Office (307) 732-3400 | Direct (307) 732-5922 | Cell (307) 690-3503
120 West Pearl Avenue, Jackson, Wyoming 83001
PO Box 10609, Jackson, Wyoming 83002



Annette Langley

From: Paul George <paulggeorge@yahoo.com>
Sent: Wednesday, May 4, 2022 12:50 AM
To: Tyler Sinclair
Subject: Proposed Change in Rental Regulations for Non-Resort Properties

I want to reiterate my prior objection to the proposed change in rental regulations. In addition to the objections raised in my earlier email to you I wish to reiterate one point. The implementation to the proposed regulation for most if not many of the potentially affected properties will not result in any increase in affordable rental properties in the Jackson Hole area. The information provided in the reports from the City don't include data demonstrating the the proposed change will result in an increase in available properties. Rather, it's only effect will be to restrict the rights of property owners like myself and certainly injure the property management businesses in Jackson who facilitate rental of homes like mine. If that is the case there is no reasonable basis for making this change. I urge you and the Council not to proceed with the proposed change.

Paul and Lynn George
PO Box 2051
Wilson, Wyoming 84014
Sent from my iPhone

Annette Langley

From: Chelsea Beets <chelsea.beets@gmail.com>
Sent: Wednesday, April 20, 2022 4:53 PM
To: Tyler Sinclair
Subject: Public Comment for 4.20.22 Planning Commission Meeting



Hello,

My name is Chelsea Beets, I am a 13 year resident who rents in Jackson, I do not own land or a home. I am against amending LDR Section 6.1.4.A.2 from 31 days to 90 days. I do not think doing so will have the type of impact on workforce housing and our whole community, as many believe it will. I would ask that before any decisions are made, a larger community discussion takes place surrounding these and other rental regulations to ensure amending current regulations will actually get to the goal of more workforce housing. It's also an opportunity to brainstorm other solutions.

Best,
Chelsea

Annette Langley

From: Lauren Marshall Scoll <lauren@abodeluxuryrentals.com>
Sent: Wednesday, April 20, 2022 6:09 PM
To: Town Council; Tyler Sinclair
Subject: Public Comment on proposed LDR for rental restrictions



Dear Planning Commission,

I'm writing to express my opinion on the Planning Commission's intent to enact a new Land Development Regulation that would prohibit any residential unit within the rental overlay to be rented for less than 90 days.

The ongoing housing shortage for the workers who are an integral part of this thriving community is a serious and worrisome matter which affects all of us as local business owners and residents.

There is little evidence however, that increasing rental restrictions in this way will actually contribute to housing options for the local workforce.

The matter of affordable housing needs more discussion and alternatives to the proposed rental restrictions should be considered before any changes are made. Specifically, answers to the following questions should be thoughtfully regarded:

- 1) What problem is being addressed by putting a restriction on rentals in this way?
- 2) How does enacting a 60- or 90-night minimum help to solve the lack of affordable housing?

As a member of the Jackson business community, I am committed to supporting the efforts to increase available housing for the workforce whether through monetary donations, volunteer hours, or other community involvement. But I do not believe that increasing the nightly stay minimums is the solution. Please consider opening the floor to more discussion before a final decision is reached on this matter.

Respectfully,

Lauren Marshall Scoll

--

Lauren Marshall
Abode Luxury Rentals
Park City: (435) 565-1555
Jackson Hole: (307) 264-1616
lauren@abodeluxuryrentals.com

Annette Langley

From: Kate Binger <katesjis@gmail.com>
Sent: Wednesday, April 20, 2022 9:27 PM
To: Tyler Sinclair
Subject: Rental regulations



Dear Tyler,

Please, I want this town to remain a community. I am in favor of the 30 day rentals to be pushed to a 90 day rental. We need this change for our town to stay a viable community.

Thanks,

--

Kate Binger
Designed Interiors, LLC
DBA: Dwelling
www.dwellingjh.com

1921 Moose Wilson Rd, Ste 102
Wilson, WY 83014
O: 307-733-8582
M: 307-690-5452



Think GREEN. Please consider your environment prior to printing this e-mail.

Annette Langley

From: John Fraser <jwf1960@gmail.com>
Sent: Thursday, April 21, 2022 5:12 PM
To: Tyler Sinclair
Subject: Rental term regulation proposal



Subject: Rental term regulation proposal

Dear Mr. Sinclair:

I am writing to express my objection to the proposed change to Teton County regulations regarding renting properties outside of the County/Town resort rental zones. I own property at 2055 Trader Road East in the Gros Ventre North association outside Jackson. Current County regulations allow County residents outside resort areas to rent their home once per 31 day period. While I understand and respect the goals associated with preventing short term rentals outside of specific, identified areas in the County, I firmly believe every County homeowner deserves the right to rent his/her home in order to generate income to fund the rapidly increasing costs associated with owning a home in the Jackson area, particularly property taxes. This is particularly true for owners who have owned their homes for extended periods of time and may not have experienced increases in wage/investment income commensurate with increases in the costs of home ownership. Many depend on rental income to ensure they can continue to enjoy all that this wonderful part of the world offers.

Increasing the non-resort area rental period from once every 31 days to once every 90 days would effectively prevent many County homeowners from generating such additional income. All this proposed change will do is benefit those homeowners in resort rental areas to the detriment of homeowners elsewhere in the County by forcing interested renters into more dense areas that may not offer the housing amenities they seek. This could in fact result in some renters seeking opportunities in other communities and detract from the value the Jackson area derives from such visitors.

I strongly urge those involved in voting on this proposal to consider the rights of all County homeowners as well as the impact this proposal could have on the number and composition of visitors to the valley and vote against making this change.

Respectfully,

John Fraser

Sent from my iPhone

Annette Langley

From: Jesse Brill <jbrill@naspp.com>
Sent: Thursday, April 21, 2022 10:37 AM
To: Tyler Sinclair
Subject: Rentals--Freedom of Choice



Please do not tramp on our property rights. Homeowners should have the right to rent their houses without government intrusion.

Thank You.

Jesse Brill

Annette Langley

From: Steve Lundberg <SLundberg@slwip.com>
Sent: Wednesday, April 20, 2022 8:56 PM
To: Town Council; Tyler Sinclair
Subject: Residential rental restrictions



To Planning Commission,

I'm writing to express my opinion on the Planning Commission's intent to enact a new Land Development Regulation that would prohibit any residential unit within the rental overlay to be rented for less than 90 days. I think that it is very important for Jackson to work hard to create more affordable housing, and on that front I am 100% in agreement.

Of course, all the interested parties who are suffering negative consequences of the current housing shortage, and especially those who can't find an affordable place to live, are looking for a quick fix to this problem. But common sense and even scientific studies tell us that the affordable housing problem won't be readably solved with the proposed requirement to lengthen the minimum stay requirement for Teton County.

In particular, reasons an "across the board" rental restriction will most likely make matters worse as opposed to improving the situation, for the following reasons:

1. Residential units such as luxury properties that currently rent at rates far above what is required to qualify as affordable housing will not suddenly be repurposed as affordable housing. Rather, this housing will either: 1) not be rented at all, depriving the Jackson community of the sales of goods and services these rentals would otherwise generate; or 2) shift to new rental strategies meeting the new minimum stay, such as renting for the minimum period at lower average monthly rates. Either way, no additional affordable housing is made available, and likely the value of these properties will be impaired and therefore their value will decrease. This will reduce property taxes and actually make it less possible for Jackson to finance new affordable housing using mechanisms like direct subsidies and Tax Increment Financing.
2. Housing currently being rented at a rate that might be considered affordable will only become more difficult to lease for the many seasonal workers due to the minimum commitment required.
3. Potentially there is some housing stock that is marginally affordable that may be forced to convert to service local, longer term rental demand, as it can no longer be rented for a month at a time, but the number of properties in this category may be minimal and do precious little to supplement affordable housing stock at the cost of lowering public tax revenues as the value of all properties affected declines across the board.

4. See the following study cited in the Harvard Business Review that recommends taking a well thought out nuanced approach to regulating property rentals due to demonstrated effect of reducing new development: <https://hbr.org/2021/11/research-restricting-airbnb-rentals-reduces-development>

Affordable housing is an important societal goal and I fully support the objective. The fastest track to this goal is likely best served by taxing short term rentals and using the taxes to help fund the public infrastructure required to build housing tailored to the need vs hope properties ill-suited to this need be repurposed.

As a result, I do not believe that increasing the nightly stay minimums across the board is the solution. Please consider opening the floor to more discussion before a final decision is reached on this matter.

Respectfully,

/Steven Lundberg/

Steven W. Lundberg

6638 Ryegrass Road

Jackson, WY

Annette Langley

From: Daniel Ewert <ewert02@yahoo.com>
Sent: Sunday, May 1, 2022 1:30 PM
To: Tyler Sinclair
Subject: Short Term Rental Length



Dear Town Planning Commission,

I oppose extending the minimum short term rental length. With increases in cost of living and taxes, homeowners who don't have a lot of cash flow will be further restricted from making any money off of their property to offset the increased costs. A homeowner who wants to camp/tent for 1 month to rent their place out and make a bit of money to offset costs would be harmed by this proposal, and there would be no resulting increase in available housing to anyone. Extending the short term rental length would be a gift to the big hotel and lodging industry. The 30 day length is appropriate as it is, and accomplishes the purpose of not having rapid turnover in any house outside the lodging overlay zone. Thanks for your consideration.

Daniel Ewert
307-264-0701

Annette Langley

From: Trissta Lyman <trisstalyman@gmail.com>
Sent: Wednesday, April 20, 2022 12:46 PM
To: Tyler Sinclair
Subject: Short Term Rental



Hi Tyler,

I am emailing to show support for extending the minimum length of short term rentals from 30 days to 90 days. We have enough hotels in town and out at the village to accommodate travelers and tourists. I do not think short term rentals are needed period. However, if they are to be here, I would encourage them to be at a longer term to accommodate housing for traveling, nurses and other professionals, if they choose to have them. I support affordable housing for local workforce.

Thank you,

Trissta

Annette Langley

From: Connor Phillips <phillycondor@gmail.com>
Sent: Thursday, April 21, 2022 9:52 AM
To: Tyler Sinclair
Subject: Short Term Rentals

Hello,

I'm writing to in regards to short term rentals in town. As a volunteer firefighter, I aim to provide essential services to our community. This community that I invest so much time, energy, and, at times, my life to continues to change. Change in the wrong direction, in my opinion. Yet changes that, with proper action from elected officials, may become undone. One way to help get our community back on track is to discourage short term rentals, thereby providing additional homes for the local workforce. Please, extend short term rentals to a minimum 90 day occupancy. I do not want to be a firefighter exclusively for visitors from afar. I want to serve and protect our community and our community has to live here in order for that to happen.

Best,
Connor Phillips

Annette Langley

From: pschrey@aol.com
Sent: Monday, May 2, 2022 5:59 PM
To: Tyler Sinclair
Subject: short term rentals



-----Original Message-----

From: MAILER-DAEMON@aol.com
To: pschrey@aol.com
Sent: Mon, May 2, 2022 4:50 pm
Subject: Failure Notice

Sorry, we were unable to deliver your message to the following address.

<tsinclair@jacksonwy.gov>:

No mx record found for domain=jacksonwy.gov

----- Forwarded message -----

Dear Sir,

We have owned our home in Jackson for almost 20 years. We are getting close to retiring as we are now in our late seventies and have worked our whole lives. We have been looking forward to spending more time in Jackson in our home. That dream may not become a reality for us if you pass the 90 day rental rule. We will not be able to maintain our home with the rising prices of upkeep and now higher property taxes. We have never taken advantage of the 31 day rule. We were at one point falsely charged with a misdemeanor for not obeying that rule, which caused us quite a bit of mental anguish. That charge was dropped because it was entirely false, and I considered it a malicious prosecution and a witch hunt. Before you pass such a law, please be sure the complaints you are getting are valid and not just false accusations.

We rely on the income to keep up with the rising costs in Jackson. Our home is not continually rented. It is not a revolving door rental. We keep our house well maintained and our guests are thoroughly checked out by The Clear Creek Group.

Please consider the homeowners that own these homes, too, not just the complainers.

Thank you for taking the time to read this.

Thomas and Patricia Schrey

Annette Langley

From: Skye Schell <skyeschell@gmail.com>
Sent: Wednesday, April 20, 2022 10:06 AM
To: Tyler Sinclair
Subject: Short-term rental comments / local worker and owner-occupied exemptions



Dear Tyler, Planning Commissioners, and Town Councilors:

I just reviewed the staff report re: short-term rentals and would like to comment as a resident and homeowner. Thanks for all your work on this topic!

In general, I **support tightening the rules on short-term rentals, such as by increasing the minimum stay** from 30 to 90 or more days. When short-term rentals take homes out of the pool for local workers, they contribute to our housing crisis and make it harder for our community to function.

I would also request two important exemptions, one similar to an idea in the staff report, and the other new:

1. Local worker exclusion: local workers should be able to rent rooms or apartments for any length of time. As someone who has rented long term, with many roommates, we have often had situations where someone is between rentals and needs a place for a month or even a couple weeks. This should not be illegal. (I understand this is difficult to enforce, and I would suggest that proof of local work only be required if enforcement is triggered by complaint.)

2. Owner-occupied exclusion: I strongly support an exemption for owner-occupied homes. I got lucky with amazing landlords who sold me the house I had rented long-term, with seller financing (something I hope more sellers do). Given the incredibly high cost of living here, and how it continues to increase, being able to occasionally rent a room or house for a short timeframe (like a week) would help me afford to stay in the house in general. I know there are many others in similar situations. I would recommend as little red tape as possible. Please continue to consider this part of long-term use (not short-term with fees, lodging tax, etc) since it is not a standalone lodging use but just part of the owners affording to stay in their home.

Here are my comments on the categories raised in the staff report:

- Eligibility: keep this wide: require **owner occupancy for 9 months** (not 10 - to allow for teachers or seasonal workers to travel); **do not require a set number of hours per week or year** or if you do, keep it low (again, to allow for the variety of work that people do here / having to do some work elsewhere)
- Exclusion: allow owners to (A) rent rooms to **local workers unlimited times** for any length of time (this would be covered under the "local worker exclusion"), and (B) rent rooms/apartments to anyone **4-8 times / year for any length** (no 30-day minimum)
- Permitting: owners should **only need to get a permit once**, to prove eligibility, and then include that permit info on rental listings. This would decrease hassle for owners and decrease burden on staff. Permit fees should be as low as possible.
- Renters: see above - unlimited rental to local worker renters, limited rental (4-8x/year?) to unlimited renters

I understand that adding exemptions makes the program more complicated and harder to enforce. However, it would also make local renting and owning more possible for people who are just barely breaking even (either renting or owning).

Thank you for considering my comments - I'm happy to share / talk more if you'd like.

Take care,
Skye

--
Skye Schell

Annette Langley

From: aburton@wyoming.com
Sent: Monday, May 2, 2022 11:49 AM
To: Tyler Sinclair
Subject: Short-term rental extension



RE: Short-term rental extension

Attention: ***Town Planning Commission***
tsinclair@jacksonwy.gov

- Please extend the minimum short-term rental length!
- Neighborhoods are for neighbors!
- Extend short-term rental lengths: people over profit!

Hello members of the Town Planning Commission,

My name is Angela Burton and I am writing today to offer my support of the proposal to extend the minimum length for a short-term rental in Jackson from thirty days to ninety days.

We are all affected by the current and ongoing housing emergency in Teton County.

Addressing said emergency with positive and proactive change only improves our collective character by ensuring a diversity of residents can remain here to strengthen and add richness and depth to our community.

While it may seem like a small step, extending the minimum length for a short-term rental to ninety days would at least be a step in the right direction. There are already plenty of hotels and condos for tourists in the Teton County region. We need to do everything in our power to protect what few rentals we have left for the locals who so desperately need them.

If we do nothing in the face of this emergency, there WILL come a day (and soon) when this town is a shell of its old self, unable to regenerate and flourish as its less-affluent members are forced out, existing businesses are forced to close due to lack of staff, and services are cut across the county because demand cannot be met. Then who will serve our visitors?

This change is by no means a silver bullet—but it would make a statement that our priority is to our community, the very real humans who are experiencing very real pain when it comes to housing security. Supporting this change is low-hanging fruit and we must start somewhere. Any step, however small, in the right direction is still a step, and better it be forward than not at all.

Thank you for your consideration!

Sincerely,
Angela Burton

38 year Teton County resident
POB 13100 83002

Annette Langley

From: Ryan Dorgan <rpddorgan@gmail.com>
Sent: Wednesday, April 20, 2022 12:37 PM
To: Tyler Sinclair
Subject: Short-term rentals



Tyler,

I'm writing to express support for the staff recommendation to update the current short-term rental minimum occupancy length from 31 days/1 month to 90 days/3 months. I hope that this change results in more rental units available to the local workforce as well as more efficient and effective enforcement of short-term rental regulations.

One concern that came to mind is that this change could simply shift this segment of short-term rentals from tourists and remote workers to those remote workers willing to commit to a three-month stay. This situation could incentivize rental managers to price the units above what many local workers - both seasonal and year-round - could afford.

Thank you,
Ryan Dorgan

Annette Langley

From: Matthew Russman (Gmail) <matt.russman@gmail.com>
Sent: Wednesday, May 4, 2022 2:36 PM
To: Tyler Sinclair
Cc: Lisa Russman
Subject: Town of Jackson Planning Staff Meeting - May 4



Dear Mr Sinclair,

I am a new homeowner in the Hidden Hollow development in downtown Jackson. I am writing to provide my input regarding the potential amendment to the Land Development Regulations to limit homeowner rentals to a minimum of once every 91 days.

I recognize that a lack of affordable housing in Jackson is forcing too many workers to drive from Victor or Alpine, exacerbating traffic congestion, generating air pollution and harming wildlife. Although I share these concerns, I am also deeply concerned about the impact of this proposal on private property rights.

We purchased our home with the intention of living there as well as traveling and renting it periodically to tenants. The existing rental limitations, which are already highly restrictive, were incorporated into our estimation of the property's cost and value.

To change these rules now, the Town of Jackson should meet a high burden of proof regarding the value and effectiveness of any new limitations. However, I am extremely concerned that our property rights will be impaired even though no research or data has been presented to demonstrate how these new rules would ease traffic, improve affordable housing availability, or achieve any other community goals.

It is irresponsible to change a law that infringes on our property rights without any evidence that it will make a difference in the problem you're trying to solve. A better solution is an amendment to the LDR's to allow for more higher-density workforce housing (higher FAR) — this is a straight-forward solution to a problem.

Sincerely,
Matthew Russman

Annette Langley

From: Leigh Chrisinger <leigh@jacksonholepm.com>
Sent: Wednesday, April 20, 2022 1:49 PM
To: Tyler Sinclair
Subject: Town Planning Meeting



Hi Tyler-I wanted to send an email before the evening's Planning Meeting. I am sure you have heard from others in my industry, but I would love to understand what the proposed law hopes to do and maybe that's something that will be addressed today? Would your group benefit from hearing numbers from businesses like mine or having an open dialogue? We would love to help make a positive change that helps the community as well as doesn't negatively impact an industry.

I own property in Teton Co and with the increase in property taxes in conjunction with not having the ability to rent my home for a month at a time...to help pay for constant property cost increases is very scary for many local types. Teacher friends and others in the community who use that ability in order to keep their properties...are concerned about what the future holds here in JH in many ways.

Thanks in advance for your input and information...I appreciate your time!

My best,

Leigh Chrisinger

Annette Langley

Subject: FW: Contact info for PC

From: Juliann Whelan <juliannwhelan@gmail.com>

Sent: Friday, April 15, 2022 8:51 AM

To: Annette Langley <ALangley@jacksonwy.gov>

Subject: Re: Contact info for PC

Hi Annette. I sent my brief comment to Paul but if you could pass it along to Tyler, that would be appreciated.
I strongly support the proposed change in Short Term Rentals to 120 days.
Thank you.
Missy

Juliann Whelan

874 West Snow King Ave

P.O. Box 556

Jackson, Wyoming 83001

307 690 5896

--

Juliann Whelan

874 West Snow King Ave

P.O. Box 556

Jackson, Wyoming 83001

307 690 5896

From: [William REINECKE](#)
To: [Town Council](#)
Cc: [Morgan Bruemmer](#)
Subject: Increasing home rental minimums to 90 days.
Date: Monday, April 25, 2022 5:44:21 PM



Dear Council,

Would you please consider this parallel to increasing rental stays from 31 days to 90 as a way of finding affordable housing for our workers:

The Town requires 10% of the rooms at the Four Seasons be reserved exclusively for local workers at a maximum affordable rent of \$2,000 a month. The arithmetic dictates that the hotel charge \$69 a night for those rooms — why not all the hotels in Jackson and in the County, come to think of it?

It's preposterous, but it is of a similarly-unjust strong-arm tactic should our elected leaders claim control over personal property, namely mine and those of my friends, that was hard won through honest work.

When my family purchased our home in Jackson, I was working full time, and nonetheless it was a stretch; we all know about house values here, even eight years ago when our home was bought. Now retired, I depend on the income I am able to get from renting — very occasionally — which supplements my Social Security.

If we implement the proposed 90-day minimum stay, you will have shut me and my family down completely. It was already hard enough at 31 days, given that few vacationers want a home beyond two weeks. Please also consider that the management company that handles our occasional rentals, The Clear Creek Group, as well as others will likely close their doors and toss onto the street their many people who clean, repair, and manage the homes. And to what end?

Is it unsympathetic for me to add the following? The premise of a housing shortage is based in part on the definition that a 45-minute commute, such as it happens to be, exactly, from either Driggs or Alpine, is intrinsically onerous. When I worked, I would have been overjoyed to drive only 3/4 of an hour — and through scenery —rather than the 90 minutes to two hours it took on freeways in the cities where I worked.

Let's disregard that viewpoint, though, and consider perhaps that we are dealing with a different generation: is zeroing in on those who rent their homes, whether primary or secondary, the solution to helping the younger ones not to have to do what we shouldered? The report from staff itself says on Page 5 that:

“There is evidence that some residential units have been purchased to take advantage of these 12 rentals per year allowance.”

That is hardly the smoking gun one might want to prove the culpability of homeowners as a cause of a worker shortage, don't you think? And when I can no longer rent my home, as is being proposed, is there a notion that I will then make it available to the local workforce instead?

While we might well want to stem "real estate speculators" — if that is indeed what they are — from gobbling up properties that could house workers, do we want to punish our local neighbors for the crime of owning their homes and paying their taxes, which, as you likely know, went up steeply this year? Our property taxes went up 70% *from last year*. To avoid the inference that that number is a typo: seventy percent.

If you feel you must implement this punitive, redistributive and ill-conceived program, *may I ask that at least you allow those who have already purchased be grandfathered in and exempted from the hammer of a 90-day rule?*

But do please consider the possibility of unintended consequences should you even carry that through out of respect for those already here:

If people with money truly are the problem in our community, as some allege, what does that say about Jackson, Wyoming in totality?

Who are our good workers relying on for their employment? Each other?

We are all in this together. Let's find something that honors that, no?

Sincerely,

William Reinecke
687 E. Kelly Ave.
805-660-0505

From: noreply@civicplus.com
To: [Town Council](#)
Subject: Online Form Submittal: Pat Smidores Email the Town Council
Date: Thursday, May 26, 2022 4:43:19 PM



Email the Town Council

Email Content:

Stop Pacaso Now is a grassroots group of neighbors and communities that have been impacted by Pacaso. We have a website with more information at www.StopPacasoNow.com.

We are alerting you because we can see that Pacaso has purchased homes in your town and also has 'Prospects' they are floating to see if there is interest.

Other communities have worked to update their ordinances to specifically address Pacaso and other fractional ownership models created by corporations that are not in commercial areas. These can be found on our website.

Please do not hesitate to contact us for more information,
Thank you,
Pat at Stop Pacaso Now

Your Name: Pat Smidores

Your Company Name: Stop Pacaso Now

Your Phone Number: 650-722-0118

Your Email Address: stoppacasonow@gmail.com

Your City: Sonoma

Your State: CA

Your Zip Code: 97654

Email not displaying correctly? [View it in your browser.](#)

From: [David](#)
To: [Raz Reinecke](#)
Cc: [Town Council](#)
Subject: Re: Impacts of the Proposed changes to minimum rental days in Jackson
Date: Monday, April 25, 2022 7:04:35 PM

Dear elected officials,

I agree with Raz 100%. I am retiring and a significant portion of my retirement plan and income revolves around being able to rent my home a few months a year. I would hope that you would at least consider grandfathering in existing rental units as this will be most unfair

to retirees who are counting on this income for their retirement. As you know property taxes have gone up significantly but retirement incomes have not. Thank you for your consideration.

Sincerely,

DAVID THRASHER

> On Apr 25, 2022, at 3:57 PM, Raz Reinecke <rfreinecke@mac.com> wrote:

>

> Dear Jackson town council members,

>

> My husband and I are retired senior citizens and live in Jackson. We don't have any family or relatives in Wyoming but for my niece, her husband and their 9 year old daughter. On their own, like many other locals, they were faced with the unaffordable housing situation and having to leave the area. Their strong preference was to stay and it is our strong preference, too, to have them stay and help us as we age. Considering that JH doesn't have enough assisted living for the aging population, this preference is beyond being nice to have rather a critical consideration for my husband and me.

>

> So, last year amidst the rising house prices, we brainstormed a solution however imperfect. We bought a townhouse in Rafter J, putting down a substantial down payment that depleted our retirement savings and took out a jumbo mortgage for the rest. The solution we had found was to rent out our house in town during the peak tourist season, fully compliant with the town's 31 day minimum rental days, to pay for the new property and our sky rocketed property taxes. As hard as it is, we were all happier to have to shack up together for those months in the RJ townhouse or go camping whenever possible than having them leave.

>

> It's important to also consider the impact of the town having rapidly raised our property taxes, in this year alone by 70%. Clearly, we need a substantial amount of income from rentals to be able to pay for all this. That kind of income cannot be had by renting out our house to local workers at an affordable rate for them. But renting to vacationers during the peak tourist season can for now.

>

> The proposed 90-day minimum rental restriction, virtually eliminates the possibility of us locals to fund this self-generated two prong remedy to our problems. If this measure goes in, I'm afraid that we would not be able to keep the RJ townhouse and here are the consequences that I foresee, right now:

> - our niece and her family who are our only local support will have to leave Jackson because we cannot afford the mortgage to let them live in RJ;

> - we would have to sell the RJ house because no local would be able to afford the kind of rent it takes for us to offer the townhouse to another local family like our niece's, nor a local family will be able to afford buying the townhouse;

> - we would have to eventually sell our Jackson home and leave Wyoming altogether because (1) the property tax increases and the cost of living have skyrocketed in Teton county, and (2) we have no one in Wyoming to help us age in place as we enter our 70s.

>

> You should understand that our opposition to this new rule is in no way in contradiction with the fact that we need to take measures to increase the supply of affordable housing. We need our workers and housing is the remaining obstacle since the businesses seem to have already raised the minimum wage on their own - which got passed down

to us, increasing the cost of living in JH.

>

> We are fully supportive of practical measures that can actually add to affordable housing in town. However, not a single attempt has been made so far to determine the impact of increasing rental periods to a minimum of 90 days. There's no evidence that doing so will in fact help add to inventory for affordable housing. After all, these houses are already too expensive for anyone with limited means to buy. Furthermore, most, if not all, will not be offered at low rents because, at a minimum, the new property taxes alone put them outside the affordable housing range. How is a house that has a monthly property tax of \$2000 or more, a candidate for affordable housing?

>

> At the recent meeting of the planning commission, many spoke in favor of the 90 day minimum but none had any data or even a reasonable argument as to how these expensive homes will somehow become affordable rentals if we cannot rent to vacationers.

>

> I can tell you that at \$18,000 of property tax assessed to us, there's absolutely no way for us to rent to the local workers for a few months of the year and retain enough of the rental income after commissions and taxes to pay for our property tax alone much less any other expenses or the mortgage payments. And our house is definitely not the fanciest one being rented out to vacationers!

>

> When the town could not find a solution to the lack of affordable housing, we didn't just sit around and complain about the council not meeting its responsibilities like many who do. We took the matter in our own hands to help ourselves and our family. This is good old fashion American style of taking care of the business rather than expecting things to be handed to you. And we did that according to all the applicable laws, local or otherwise. Now, we are told that we are "evil millionaires worthy of losing money and family support." How does this make any sense to anyone who worked hard and saved for decades to be able to spend his/her old age with peace of mind? I'm an immigrant who arrived here alone, 42 years ago, with a suitcase and \$500 in my pocket. I have worked extremely hard to get the education I needed to then work extremely hard (mind you, commuting for 3 hours a day in horrible urban traffic) to be able to earn good money and save for retirement. To tell me, now, that my money and property should be up for grabs is simply un-American.

>

> It is disrespectful to lump us in with the so called "evil second home millionaires" by the young uninformed and inexperienced yet very vocal local workers who called in the other night into the planning commission's meeting. They were asking for our empathy when in return they offered none to us. One commenter even went so far to say that we "shouldn't have taken a big mortgage out relying on rental income," missing the irony that our loss will be the loss of a local family like hers who cannot afford the high rents and will be forced to leave.

>

> Please know that we totally understand and value our local workers. We have immense empathy and sympathy for people who cannot afford the high rents in town. We have been donating to the housing trust and have supported every measure and project that promises to provide more affordable housing, healthcare and social services to them. We simply disagree that by ruining our lives, they will gain affordable housing. In trying to find solutions for the housing shortage, let's not throw the locals like us under the bus.

>

> Elderly care and assisted living is at a great shortage in JH, worse than worker housing. So, it is more than ever important to be able to keep family support in town and age in place. We ask that the town council seriously consider the impacts of this measure on the resident elderly folks and their families. The income from vacation rentals has become more than ever a critical means for letting us age in place.

>

> Any impactful measure like this should be well thought out and researched properly. We need a deep dive into data, a good study, solid supporting evidence that by making it impossible for us to rent out our houses to vacationers that the town will ACTUALLY gain affordable housing. How will the local workers afford my house when the property tax alone will cost them \$1500 per month. How about the insurance and up keep? Do the council seriously believe that the loss of income by us to afford our arrangement will help provide housing for the local workers, and that my devastating loss will be at least "a step in the right direction" as so callously uttered by the proponents of this change?

>

> Other unintended consequences include the devastating impact on local businesses and their employees who manage and support vacation rentals. Has anyone considered the fact that this measure will eliminate the employment of many workers and even force companies out of business? The property management companies

spoke at the planning commission's meeting voicing the adverse effects of this measure on their ability to retain employees or even the ability to continue. They are not alone as their businesses, in turn, rely on many other businesses in town who support them. There will be a likely domino effect that can shake up the lives of many people in town. Is anyone looking into these unintended consequences and costs to our local families? It sure didn't seem so at the planning commission's meeting, last week.

>

> Another purported cause for making this change is that the town lacks the resources to respond to the numerous complaints by neighbors (who admittedly mistakenly) think that a neighbor is running an illegal vacation rental. However, when asked for the numbers, it was revealed that since 2014, there has been only an average of a dozen complaints a year by town residents and seemingly all in false understanding of the 31 day rental rule. The town officials claim that they have no time to deal with "the high volume" of phone calls. Really? A dozen phone calls a year is too much to handle to the point that our lives need to be turned upside down????!!!!

>

> As to the non-resident second home owners, have we considered the fact that so many are generous big donors to many of our institutions and charities? I know, first hand, of several who are amongst the biggest donors to the Old Bill's Fun Run. Their generosity is critical to the benefits that we receive from the charities and the non-profits in JH. Should we disrespect and alienate them, as so many did during the meeting, simply because they are not full time residents? Somehow, there's this assumption that if you are not a full time resident you don't care about this community. That's simply a misconception for which I find absolutely no support. Many of the non-resident second home owners are passionate about the town and JH. They cherish their time when they can be here and most I have spoken to plan on retiring here. Is our aim to make owning second homes in Jackson so onerous so that they leave our town and take their donations elsewhere, likely to another resort town with enough foresight to know to be welcoming to rich philanthropists? Let's not kid ourselves: all these wonderful amenities in this tiny rural town are in large part because of the so called "evil millionaires and billionaires" who donate large sums of money and spend big, supporting the charities and businesses. Let's not forget about their generosity and kill the goose that lays the golden eggs.

>

> Let's not forget that we live in Wyoming where we purportedly care about liberty and property rights. I implore you to take a step back and restrain yourselves from taking away our rights for an unproven cause. There are less burdensome ways to go about this. For example, you could make the changes applicable only to those who buy AFTER the new rules take effect and grandfathering those of us who rely on the income. That way, you have provided full legal notice to those considering purchasing a vacation home here in the future and have not arbitrarily changed the laws without a compelling public interest?

>

> Respectfully yours,

>

> Raz Reinecke

From: [Raz Reinecke](#)
To: [Town Council](#)
Subject: Should short-term rentals be changed from 30 to 90 days?
Date: Wednesday, June 8, 2022 6:29:29 PM

Well said! Please consider and reject this misguided proposal.

<https://buckrail.com/should-short-term-rentals-be-changed-from-30-to-90-days/>

STAFF REPORT



Meeting Date:	June 21, 2022	Meeting Title:	Workshop
Submitting Department:	Administration	Presenter:	Roxanne Robinson
Agenda Item:	Naming Public Places: Lance Corporal Rylee McCollum	Public Comment:	Yes

Purpose & Policy Considerations.

The purpose of this item is to provide Council information in response to Council's request regarding naming a public place after Lance Corporal Rylee McCollum. Additionally, this item provides information and options for a general Town policy on naming public places.

Requested Action.

Staff requests Council review and consider 1) the information regarding naming a public place after Lance Corporal Rylee McCollum and 2) the information and options for a general Town policy on naming public places.

Recommendations.

Staff recommends Council direct staff to draft a policy for the naming of public places for Council to consider adopting that, once so adopted, can be used to address all naming requests.

Background.

On December 6, 2021, the Town Council directed staff to investigate the request to have a street or park named after Lance Corporal Rylee McCollum. The motion was as follows:

I move to ask staff to come up with the process for renaming a street or other place in Marine Lance Corporal Rylee McCollum's name.

Since this initial request regarding Lance Corporal Rylee McCollum, staff received a second naming request (that ultimately was for a location in the county) and at least one other general inquiry about naming public places. Moreover, upon researching existing Town standards, staff learned that the Town has no policy for naming public places. As a result, staff is providing both information about Lance Corporal Rylee McCollum and about a general policy.

Analysis.

Naming a Public Place After Lance Corporal Rylee McCollum

Staff finds the primary key issue involved with naming a public place after Rylee McCollum is identifying the appropriate location for such a memorialization.

While a variety of places could be named after Lance Corporal Rylee McCollum (a street, park, facility), Staff recommends that any requests for naming of public places be deferred until a comprehensive policy can be put in place.

Consideration of a Town-wide Policy for Naming Public Places

Staff recognizes naming public places is complex and emotionally evocative since it is a powerful and permanent identity for places that tell the important stories of Jackson's history and reflect its values, ideals, goals, and community identity. As is well known, there has been a recent national reckoning regarding the names of public places, statues, and a wave of renaming of public places. Given this, staff suggests a carefully and thoughtfully considered policy involving the public, stakeholders, Town staff, and the Town Council be put in place. While it is possible to undertake this work before the Town undertakes the request regarding Lance Corporal Rylee McCollum, it is notable, as pointed out above, that the Town of Jackson community has an existing place dedicated to the memorialization of servicemembers. Staff recommends any further requests for naming of public places be deferred until a policy can be put in place.

Possible Alternatives.

N/A

Comprehensive Plan & Priority Alignment.

N/A

Fiscal Impact.

The direct fiscal impact of the recommendation is negligible.

Upon the adoption of a policy, the subsequent fiscal impact of applying the policy will be unique to each circumstance and can only be determined at the time of the naming and includes things such as the size, scale, and quality of signage, whether renaming is involved, and any public outreach/process involved in the naming.

Staff Impact.

The staff impact of this item falls mostly in the Legal Department in terms of drafting the policy and report. Other departments involved will include Administration, Parks & Rec, Public Works, and Community Development.

Attachments or Links.

Draft Resolution on Naming of Public Places Policy.

Suggested Motion.

I move to direct staff to draft a policy for the naming of public places for Council to consider at a future Town Council meeting.

RESOLUTION 22-_____

A RESOLUTION ESTABLISHING TOWN POLICY AND PROCEDURE REGARDING THE NAMING OF PUBLIC PLACES

WHEREAS, there is value in and a desire to name public places and amenities to recognize historic events and individuals who have made a noteworthy contribution to the good of our community and the world; and

WHEREAS, the consideration of each name for a public place or amenity must respect the values, ideals, goals, and the community identity of Jackson, Wyoming and, in pursuance thereof, names for public places and amenities should be approached with deliberation and should conform to certain guidelines and standards; and

WHEREAS, there is a need to establish guidelines, standards, and procedures for the consideration and designation of names for public places and amenities.

NOW THEREFORE, BE IT RESOLVED by the Town Council of the Town of Jackson, in regular session duly assembled, that the following Policy Regarding Consideration of the Naming of Public Places is hereby adopted:

1.0 Definitions

Amenities. Smaller furnishings and facilities within a Public Place (e.g., benches, small fountains, tables, and the like).

Lead Department. The Town of Jackson department so designated by the Town Manager upon a proposal submission, which is customarily the department most affected by the proposal.

Public Places. Any indoor or outdoor publicly owned area, item, building, facility, or the like to which the public has access by right or by invitation, express or implied, whether by payment of money or not. The term includes, but is not limited to, parks (traditional designed parks, natural open spaces, historic places, specialized parks, trails, and pathways); all buildings and structures owned by the Town of Jackson; and all major permanent components of parks and recreational facilities (e.g., ball fields, swimming pools, tennis courts, playgrounds, fountains, artwork, other physical features, and rooms within buildings).¹ The term does not include streets.

2.0 Background and Policy

Naming public places is often complex and emotionally evocative since naming designates a powerful and permanent identity for a place. The names of public places tell the important stories of Jackson's history and reflect its values, ideals, goals, and community identity. Naming a public place is a prestigious process that involves the public, various individual stakeholders, Town staff, and the Town Council. Consequently, the process for naming public places needs to be approached cautiously and done carefully and thoughtfully when appropriate. Once a name is selected for a public place it should be bestowed with the intention that it will be permanent, and changes should be strongly resisted. The Town has limited public resources for changing names on signs, maps, and literature, and excessive renaming and the naming of individual amenities can be confusing to the public. Accordingly, critical examination should be conducted to ensure that the renaming of a public place is practical and does not diminish the original justification for the name or the prior contributors. The policy of the Town is to reserve naming public places for circumstances that tradition and practice have shown to best serve the interests of the Town, assure a worthy and enduring legacy for the Town's public places, and reflect both community interest and the values of

¹ For the remainder of this Resolution the phrase *naming public places* shall refer to naming new amenities and public places, as well as renaming existing amenities and public places.

the Town. To that end, the policy set forth herein establishes the guidelines, standards, and procedures for naming public places, to which the following shall also apply:

- A. The Town Council shall have final authority to approve the naming of public places.
- B. The Town Council may pursue naming public places for goals at its discretion, including for commemorative, cultural, historic, or sponsorship goals.
- C. Public places named in honor of an individual, family, or entity may be revoked at the discretion of the Town Council at any time, without public process or hearings.
- D. The donation of land, facilities, or funds for the acquisition, renovation, or maintenance of Town facilities shall not constitute an obligation by the Town to name the facility or any portion thereof after an individual, family, or entity.

3.0 General Standards. In consideration of any proposal for naming public places, the following questions shall be considered individually and collectively:

- A. Will the name have historical, cultural, and social significance for generations to come?
- B. Will the name engender a strong, positive image?
- C. Will the name memorialize or commemorate people, places, or events that are of enduring importance to the community or the nation?
- D. Will the name engender significant ties of friendship and mutual recognition and support within the community?
- E. Will the name be identified with some major achievement or the advancement of the public good within the community or the nation?
- F. Will the name be particularly suitable for the public place based on the location or history of the place or the surrounding neighborhood?
- G. Will the name have symbolic value that transcends its ordinary meaning or use and enhance the character and identity of the public place?
- H. Will the naming request that accompanies a corporate gift result in the undue commercialization of the public place?
- I. What financial and public resources will need to be devoted in the naming of the public place?

4.0 Naming Guidelines and Standards. In consideration of any proposal for naming public places, the following applicable guidelines and standards shall be considered individually and collectively

4.1 Naming for Exceptional Individuals.

- 4.1.1** Naming public places for an individual is reserved only for persons who are deceased. Such naming after a person shall not occur until the person has been deceased for at least three (3) years and that person's significance and good reputation have been secured in the history and lore of the community or nation.
- 4.1.2** Naming public places in recognition of an individual shall be reserved for those who contributed outstanding civic service for the betterment of the community during their lifetime. The quality of the contribution along with the length of the service of the individual should be considered.
- 4.1.3** Naming public places after national or international figures should be rare and only upon a substantial demonstration of the figure's connection to or special importance in the Jackson community or the State of Wyoming.
- 4.1.4** Naming public places after a group of people who perish in or survive a tragic event or war should be considered only well after the public shock generated by the tragic event or war has lessened. Potential sites for such memorials should be focused on public places that are more known for their serene and contemplative nature rather than active recreational locations. Emphasis should be placed on the contributions to the community or heroic actions of these people during their lifetime, rather than the circumstances of their death or survivorship.
- 4.1.5** Exceptions for naming public places for living persons may occur as described in Section

5.5, Major Gifts.

4.2 Naming for Historic Events, Places, and Persons. When a public place is located near or otherwise associated with events, places, and people of historic, cultural, or social significance, it is appropriate to name the public place after such events, places, and persons. The relationship of the public place to the events, places, and persons of historic, cultural, or social significance should be demonstrated through research and documentation. The appropriateness of naming public places after such an event, place, or person is further supported if people of the Town or the surrounding region have already identified the public place with the name of the event, place, or person.

4.3 Naming for Major Gifts. Typically, the donation of gifts to the Town should be reward in itself. On a rare occasion, a gift will be made to the Town (or a specific department or initiative thereof) that is of such magnitude and generosity that naming a public place in honor of or at the request of the benefactor may be considered. Any name proposal associated with a major gift must meet all of the following general guidelines and standards:

4.3.1 Threshold. As a guideline but not a limitation, the threshold for naming rights on public places includes two, but preferably more, of the following types of donations: 1) deeding to the Town the land on which the public place to be named will be situated; 2) payment of 75% or more of the capital costs of constructing the public place to be named (considering matching fund or grants); 3) a long-term endowment for the repair and maintenance of the public place to be named; and 4) the provision of significant program/departmental costs for the public place to serve programing/departmental needs.

4.3.2 Naming for Persons. Benefactors seeking naming rights for major gifts shall follow all general guidelines set forth in this policy, however as an exception to 4.1.1 a living person(s) name may be considered provided that the person(s) is of good reputation. Whatever contract accompanies the gift and naming rights must address certain conditions applying to the naming, including at minimum, that time limits will be set on the naming and the Town will reserve the Council's exclusive right, at its sole discretion, to rename the public place if the person(s) for whom it is named turns out to be disreputable or subsequently acts in a disreputable way.

4.3.3 Naming for Entities. A corporation, association, or other legally created entity making a major gift may request that the name of that entity be associated with the name of the public place. Each request is evaluated on its own merits. In making a recommendation for a corporate name, the reputation of the company and community support should be considerations. No corporate logos, brands, insignias, or direct advertising text may be used as part of any name association or naming. As noted in herein, renaming of any existing public place is discouraged even when associated with a major enhancement gift. The Town reserves the right to remove an entity name association on any public place or to rename it if the entity turns out to be disreputable or subsequently acts in a disreputable way.

4.4 Sister Cities Program. The Town may consider naming public places for the international cities associated with the Town's Sister Cities program.

4.5 Natural or Geological Features. Names of public places may be based on distinctive, predominant, and defining natural or geological features of the Town and surrounding area.

4.6 Streets. This policy does not allow for the renaming of streets, with the exception of 5.1. However, the honorary naming of a street and the naming of new streets shall follow this policy.

4.7 Other Considerations.

4.7.1 Subdivision. Typically, a public place should not be subdivided for the purpose of naming unless there are readily identifiable physical divisions (major roads, waterways, etc.) in the public place and there are other compelling reasons for having more than

one name for the public place. This limitation on naming public places should not prevent giving a different name for a trail, building, or major feature, or distinct area located in public places.

4.7.2 Temporary Use. Public places that are held by the Town through lease, use agreement, or have a distinct limited life span or occupancy should not be named.

4.7.3 Signage. All signs in public places must meet and not depart from the Town's graphic and signage standards. No specialized signage will be displayed.

5.0 Renaming Public Places.

5.1 Renaming Generally. Proposals to rename public places are not encouraged and should be entertained only after fully investigating and considering the potential impact of removing the current name. Names that have become ingrained or widely accepted in the community should not be abandoned unless there are compelling reasons and strong public sentiment for doing so. Historical or commonly used names should be preserved when possible. A renaming proposal shall be subject to the guidelines and standards set forth in this policy and to the procedures in Section 7.0

5.2 Removing a Name Based on Derogation or Offensiveness. A name that is derogatory or is shown to be offensive to a particular racial or ethnic group, gender, or religious group may be removed at the discretion of Town Council at any time, without public process or hearings. While names that have become ingrained or widely accepted in the community should not be abandoned without compelling reasons and community consideration; derogation and offensiveness to a particular racial or ethnic group, gender, or religious group are compelling reasons for removal.

6.0 New Public Place Without a Name Request. If a new public place is completed and no suggestion for a name has come from the community or in association with any gift, the Town will propose a name, using any organized public process that it deems appropriate (i.e., Town-initiated proposal, field public nominations, community contest, etc.). A name proposal developed under this Section shall be subject to the guidelines and standards set forth in this policy and the procedures in Section 7.2 and 7.3.

7.0 Process for Proposals to Name or Rename a Public Place.

7.1 Proposal Submission. An individual, community group, or business proposing to name a public place must provide a written proposal to the Town Manager, or their designee. The written proposal shall address the guidelines and standards set forth in this policy, and how the proposal meets the applicable standards.

7.2 Processing of Proposal by Town Manager. Upon the submission of a proposal, the Town Manager, or their designee, shall designate a Lead Department to assist with the proposal. The Town Manager, or their designee, and the Lead Department shall review and analyze the proposal for compliance with the guidelines and standards set forth in this policy. If the proposal does not comply herewith, the Town Manager will not advance the proposal to the Town Council and shall communicate such determination to the proposer. If the proposal complies herewith, the Town Manager will advance the proposal for Town Council consideration via a staff report that addresses, at minimum, the proposal's compliance with the guidelines and standards in this policy, as well as the financial, practical, and legal impacts and ramifications of the naming or renaming.

7.3 Town Council Review. Upon presentation of the staff report by the Town Manager, or their designee, the Town Council may approve the proposal as is or deny the proposal. If Council elects to propose a modified name or renaming of the public place, the item shall be placed on a future agenda and repeat the process set forth in 7.2. and this Section 7.3.