

September 30, 2015

Board of Teton County Commissioners  
Jackson Town Council

Dear Board of Teton County Commissioners and Jackson Town Council,

Thank you for the opportunity to comment on the draft Workforce Housing Action Plan. We commend all of you, your staff, and the stakeholder group for investing great amounts of energy and passion in this draft Plan. We support our community's goal of housing 65% of our workforce locally and we believe that in order to maintain our community character, hard-working families should be able to live here.

This draft Plan takes important steps in the right direction, and with a few improvements, could even more effectively advance our community's housing goal. Specifically, we recommend the Workforce Housing Action Plan:

**Provide clear targets and goals based on more complete data.**

The draft Plan identifies a "need" of 280 housing units per year: 200 needed by potential employment growth and 80 to "catch up" on existing needs. However, the Plan admits, "This catch-up number does not address overcrowding, condition of home, cost-burden, or other existing housing deficiencies" (2-4). We recommend at least estimating a full catch-up number, potentially with help from organizations like the Community Resource Center and Latino Resource Center who could help determine how many of their clients are in such situations.

Once we have a more accurate estimate of the need, the Plan should estimate how many units we believe are possible to produce or preserve per year. The Plan includes a list of tools; it should also estimate how many units various tools can produce or preserve. Finally, once we know the need and our resources, we should set a clear target: *how many homes are we planning to build over the next 1, 5, or 10 years?* That final step—a realistic, achievable, and quantifiable goal—will turn this into an actual "Action Plan."

**Limit commercial growth in order not to make our housing problem worse.**

A quick look at the "need" – 200 units to address projected employment growth, over twice as many as the 80 units to catch up with our existing problem – shows that potential commercial development is a major cause of our housing crisis. As a result, we should (1) not further increase commercial development potential, and (2) ensure that commercial development fully mitigates its housing demands. Initiative 8C (page 8-5) is an excellent approach to this issue and we fully support prompt action on this recommendation. This is a simple, effective, and almost no-cost policy change that would have a large positive impact on our community.

### **Prioritize zoning for housing.**

The draft Plan also has excellent recommendations regarding encouraging workforce housing through zoning tools, either by removing barriers or by providing incentives for production or preservation. This should be done in alignment with Comprehensive Plan and respective character district goals; methods such as putting most of the “upzone” in incentive (instead of by-right) zoning and then only counting units when permitted (instead of planned) could provide flexibility. Where appropriate, we should allow and encourage apartment buildings and Accessory Residential Units (ARUs) as they support both owners’ and renters’ pursuit of affordable homes. We should also calculate the amount of land it will take to meet our housing goals and then zone land for housing without allowing competing uses on those housing-zoned lands.

### **Align our budget with our values: Invest in building housing.**

We also support the analysis and initiatives in chapter 7: “Dedicated Funding Plan.” Budgets are the clearest presentation of values, and our budget should include funding to ensure that hard-working families can afford to live here. We stand willing to support well-crafted and accountable new revenue streams that advance this goal. Our housing problem has gone on too long with too little public investment; it is time for us to align our investments with our values.

### **Choose the most effective and least politicized structure for providing housing.**

Evidence from other communities around the country struggling with workforce housing shows that having a Housing Authority provides benefits both in terms of what powers it has (bonding, financing, etc.) and perhaps more importantly, a (quasi) independent Authority is at least one step removed from political winds. An appointed board is slightly more removed from politicking than an organization that reports to elected representatives. Housing projects often take many years from concept to construction, and an organization that is constantly responding to political pressure is much less effective than one with a layer of insulation. We therefore recommend keeping an independent board, as is currently the case.

We support the strategies of joint public-private partnerships, granting land to private developers, and other innovative tools to bring the private sector into the fold. However, as everyone agreed at the Housing Summit, the problem we are addressing is huge and requires all tools on the table. Therefore, we do not support the recommendation in Initiative 5B to “get the public out of the developer role.” We believe the Authority should create a process where private partners could bid on projects; in the case where no private partner can propose a more efficient/effective project than the public agency could perform, the agency should get it done.

We strongly support the recommendation of a joint Town-County Authority, as a community-wide entity with a holistic approach would likely be more effective than an

entity representing only one of our jurisdictions.

**Set realistic expectations for coordination.**

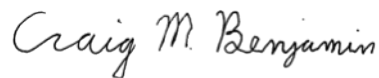
The initiatives in Chapter 6 regarding standardizing applications, enforcement, restrictions, etc. are very well meaning, but seem unrealistic. What incentive do private non-profit organizations have to change their procedures, restrictions, or even forms? In order to be effective, this Plan must describe how and why providers will realistically be expected to change their practices.

**Prioritize development of the Housing Supply Program.**

Many people in the community have commented “there’s nothing in the Housing Action Plan that will actually get housing built.” We believe they say this because they expected to see the material promised in the “Housing Supply Program.” We recommend the final Plan includes details regarding how this Program will get developed and an outline of what it will likely include. If the Workforce Housing Coordinator must be hired in order to create the Housing Supply Program, we recommend hiring that person as soon as possible.

Again, we appreciate the time you and your staff have dedicated to this critical effort. We look forward to participating as a stakeholder in the upcoming meeting.

Sincerely,



Craig M. Benjamin  
Executive Director