



December 29, 2014

Teton County Board of County Commissioners
P.O. Box 3594
Jackson, WY 83001

RE: Assessment of Workforce Housing Provision and Management

Dear Mr. Chairman and Commissioners,

Please consider this letter to be a formal response by the Teton County Housing Authority's (TCHA) Board of Directors to the *Assessment of Workforce Housing Provision and Management* (hereafter the "Assessment") compiled by Mr. Timothy Wake. It is based on staff research about the validity of the factual basis of the Assessment and input from the Teton County Housing Authority Board of Directors, which held a special meeting on December 5, 2014, to specifically discuss this document.

For context, the Assessment was commissioned by town and county elected officials to assist the ongoing efforts of the Workforce Housing Stakeholder Group. This broad group of community leaders has volunteered to produce a Workforce Housing Action Plan, an effort facilitated by TCHA to assist elected officials in the implementation of the recently completed Comprehensive Plan.

In short, TCHA finds little value in this work product, primarily because the report did not adequately address the Request for Proposal's primary goals of assessing the "effectiveness of various housing providers," deliver a "study of the structure of housing programs in peer communities as well as the primary tools they use to produce, preserve, and manage workforce housing," or provide a "technical recommendation ... that will allow the community to meet its housing objectives." The entire Request for Proposal can be reviewed on page 3 of the Assessment.

Fundamental concerns include:

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1. Not only is the information superficial and narrow in scope, but much of the data is inaccurate and therefore misleading. See below for a list of several examples of inaccuracies and issues of concerns.

2. In general, the report's "Observations" lack depth and specificity to Jackson Hole. Obviously, there is more demand for workforce housing than supply; land is expensive; the organizational framework for producing housing can be improved. This is information that is common knowledge among most residents, and certainly among the Workforce Housing Stakeholder group. Often missing, however, is the history.

For example, Observation No. 1 states: "The provision of workforce housing is not keeping up with the increase in demand." Based on the recently completed Comprehensive Plan, which is not referenced anywhere in this report, it is arguably more accurate to say the availability of workforce housing has been limited by design after prioritizing a "grow slow, grow smart" philosophy, not because of a lack of foresight or errors in planning. The community has made clear by electing those who agree that it is a priority to preserve open space and wildlife habitat while concentrating development in established neighborhoods, and that it is not possible or desirable to build enough housing to fully meet current and future demand.

3. Subsequently, the report's "Recommendations," which do provide the starting points for many critical discussions, are not supported by the research provided. For example: *Why* should the community consider creating a Workforce Housing Campground within walking distance of downtown? In what other communities has it been shown to be successful to increase allowable densities, develop units that could be purchased by small employers or reduce the mandate of the regional Housing Authority? These may all be compelling ideas, but stakeholders once again will have to rely more on their prior understanding of the underlying issues than anything provided in this report.

4. One of the Assessment's ultimate conclusions is that we need to "Implement a Dedicated Funding Stream for Workforce Housing," which already has a consensus among the majority of stakeholders and elected officials. Many agree, as Mr. Wake states, that "The Workforce Housing Partnership will need to be established." What this report sought, and quite specifically requested, is at the very least a general outline of an organizational structure that might address this and actionable suggestions for how to move in that direction. However, this guidance is very difficult to infer from the contents of the report.

Factually, the Assessment contains many errors that call into question the accuracy of the Assessment as a whole. We specifically note the following errors:

1. TCHA has in fact developed 135 units, but the author reports 58 units. In addition, the report does not include collaborations with Habitat for Humanity where TCHA provided land for the majority of their units or collaborations with Pioneer Homestead and the developer of Snow King Apartments by providing \$775,000 in funding, which facilitated the construction of 50 restricted rental units.

2. There are 36 units at Mountain View Meadows that appear to be included as Jackson Hole Community Housing Trust developed units. These units were in fact developed and constructed by TCHA. JHCHT is currently managing those units and collecting the ground lease fees to cover its administrative costs, however, the land is owned by TCHA.

3. The author appears to have deemed some TCHA developed units as regulatory since the County's housing fund was a source of funds for them. However, nowhere in the report is this explained or evident.

4. The report indicates there are many employer units that are not restricted or tracked. It implies that TCHA is lacking in its duties by not tracking them or restricting them. However, the majority of employer units are market units that were purchased by an employer and are used for its employees. There is no way to track this and no legal way to force employers to restrict the units. Accessory Residential Units are currently being tracked, but were not always tracked by TCHA. This is why there are "missing" ARUs.

5. In looking at Workforce Housing unit Production, the author focuses exclusively on the time period between 2007 and 2014, a time of recession and limited development (just two projects). TCHA also spent much of this time defending a lawsuit that significantly hindered development efforts.

6. JHCHT's use of public funds isn't clear in the report. Funds from the School District, Town of Jackson social and human services funding, and other Town of Jackson funds do not appear to be fully included or analyzed.

7. The author interviewed thirty people for this report, but chose not to interview a single current or former TCHA board member.

Following are numbers that are accurate as to housing units that have been created by the three housing organizations:

	TCHA	JHCHT	Habitat
Ownership			
Units Developed	134	66	0
Units Constructed	2	0	27
Units Managed	369	101	27
Rental			
Units Developed	0	0	0
Units Constructed	0	0	0
Units Managed	10	2	0

In summary, TCHA staff and board members are disappointed in the depth and quality of the information provided in the *Assessment of Workforce Housing Provision and Management*. This is all the more frustrating given that the efforts of the Workforce Housing Stakeholder Group were delayed due to the Assessment. As the Assessment states in the “Conclusions” section, “There is still considerable work to be done on exactly how to implement the two primary recommendations.” This is something TCHA and this community ultimately already knows to be the case. It was hoped that this Assessment would assist our efforts in this regard, but after closely reviewing this report, it is TCHA’s conclusion that this report is of little value.

Going forward, TCHA’s intention is to make recommendations to both town and county elected officials regarding a path to meeting the community’s goal to house sixty-five percent of our workforce locally. Specifically, we must obtain a dedicated funding source for workforce housing and determine how to leverage public funds in the most efficient and effective manner possible.

Respectfully submitted,



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Cc: Jackson Town Council

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