

**Submitted April 17, 2024 at 4:45PM**

Dear Council,

As I submit this letter today (with the goal that it be included in the City Council Packet), there are still no documents pertaining to the April 24, 2024 public hearing for the Sherman Park Workforce Housing Project available to the public via the City of Victor website. More specifically, there is no draft Development Agreement available for me to review, even though that is the precise purpose of the City's request for public comments and the upcoming hearing.

Because I cannot comment on what I cannot access or read, I have kept my comments broad. Please keep this in mind as you read this comment letter.

I am writing as a life-long member of the Teton Valley community. I grew up in Victor and was lucky enough to move back after college. The only reason that I am able to live in the Valley is because I live with my parents. I would likely not be here if this were not the case due to high housing costs and availability issues. That is the reality of the housing situation in Teton Valley. I have watched close friends battle with the question of whether to leave because they can't find a place to live, can't afford rent, or need to live in a situation with multiple roommates. It is unbearable to watch the community that I grew up in become unaffordable for normal working class folks, while the number of second homes and short term rentals increases exponentially. **This is why I have been closely following the development of capital "A" Affordable Housing with bated breath. Over two years ago, I began attending many of the Teton County Joint Housing Authority (TCJHA) meetings because I wanted to know what was being done to address these pressing issues.**

I watched the TCJHA meetings in 2022/2023 where TCJHA deliberated on Sherman Park, including the back and forth between the City of Victor and TCJHA that transpired during these public meetings. At the same time, I watched the Victor City Council meetings on the project. **I was surprised and concerned by how little constructive dialogue appeared to be happening between Victor and TCJHA leading up to the developer selection for the Sherman Park project.**

I was equally surprised when the Snavelly Group (Snavelly) was chosen as the developer for the project over Northwest Real Estate Capital Corp (NWRECC). In their presentation to the City Council on 12/1/22, Snavelly portrayed themselves as the natural choice mainly because they are skiers and enjoy Teton Valley. While those may be wonderful characteristics, they have absolutely no bearing on their ability to build Affordable Housing. Snavelly's actual presentation to Council was shockingly lacking in terms of hard numbers. They did better address the AMI level laid out in the RFQ than NWRECC, who proposed a lower AMI target for the project (mainly because of the financing challenges associated with building higher AMI housing). However, at the following TCJHA meeting on 1/4/23, the Board discussed substantial concerns that the rapidly changing market would soon make the 80%-120% AMI target essentially market

rate. This concern was shared by more than one Board member. **Despite these concerns, Snavelly was still chosen at this meeting. I would highly recommend that Council review the meeting minutes (available on the TCJHA website) from 1/4/23.**

Despite this rocky start, I assumed that at least this development would help house teachers, firefighters, and police officers, as was mentioned numerous times during City Council meetings. Additionally, Snavelly's plan to build a childcare center seemed like a good addition to the project. I work at a preschool in the Valley and I was pleased to see childcare space, that is so desperately needed, be included in the project.

Then, a few months ago, I became aware of discussions happening amongst neighbors who were concerned about the true affordability of the proposed housing project as well as the process being applied to the development and the removal of the childcare center. I also work as the Research Associate for Valley Advocates for Responsible Development (VARD). Yes, like many people my age who live here, I work two jobs and still cannot afford housing. Working for VARD has been a valuable education in local government issues and processes. **I am a member of the community who attends the vast majority of local government hearings, reads nearly every major land use application that comes into Victor, Driggs, and Teton County, Idaho and who conducts land-use research for a living.**

So, I decided to do my own due diligence, and Sherman Park quickly became a rabbit hole for me; I spent roughly 85 hours last month reading and reviewing everything I could get my hands on in relation to Sherman Park. I grew incredibly concerned about the viability of the project as well as the process being applied to this project at a City level. **I have read every single document that I could find in relation to Sherman Park, and I can honestly say that nothing I have read has assuaged my concerns. In fact, the more I have read, the more concerned I have become. Not only is the financial viability of the project incredibly unclear, the process deployed by the City in relation to the project has been exceedingly difficult to follow because, at nearly every turn, the City has broken with the established process and, at times, their own code.**

I completely understand the need to reduce barriers to the building of Affordable Housing when those barriers serve little purpose besides stalling the project. **However, removing the project from the public process to such a degree that even those of us who have been professionally tracking this development cannot follow the process is a massive issue that should be taken extremely seriously, if for no other reason than it opens up questions of due process.**

I am NOT opposed to Workforce or Affordable Housing and I think it is deeply unfortunate that those of us raising legitimate questions about the project have so quickly been written off as NIMBYs. This sort of rhetoric is very effective at shutting down constructive conversation and painting the issue as "us vs. them", rather than acknowledging the nuances and complexities of Affordable Housing development. **I strongly oppose using valuable communal resources to build housing that is not Affordable for Teton Valley.**

In their own presentation at the March 13, 2024 City Council Meeting, the Snavelly representative admitted that the difference between the rents they will charge and market rate rents will be minimal, especially at 100% AMI and higher. This begs the question, *why are we using public land (valued at \$2.2 million) and fee reductions (up to \$375,000) to essentially subsidize market rate housing?*

I would love to see a development at Sherman Park that targets a lower AMI with rental units OR provides ownership units for the 80%-120% AMI as is clearly indicated as a need in the Teton Regional Housing Needs Assessment (and was part of the original RFQ for Sherman Park). **In service of the goal of building a project that truly supports the community, I would like to see the City host a community meeting to discuss the project with all interested parties.**

There has been a lot of conversation surrounding the way that AMI is calculated by HUD and if Teton County, Wyoming (the wealthiest county in the nation) is factored into our AMI. Logic tells us that even if HUD does not use direct data from Teton County, Wyoming in their calculation, the AMI in Teton County, Idaho is artificially elevated because so many people work in Jackson and commute (not to mention the influx of remote workers & second home owners during COVID). If we want to build Workforce Housing that is affordable for Teton County, Idaho's workforce (while using State of Idaho Workforce Housing Funds - specifically set aside to support the Idaho workforce), perhaps the overall AMI on the project should be lowered to account for the difference. Snavelly's attempt to give preference to Teton County, Idaho workers will not have much effect if the units are too expensive to begin with.

I have heard, "we can't be Jackson's housing solution" during Victor City Council deliberations more times than I can count. And yet, here we are building housing that is clearly targeting Jackson's workforce (I would recommend reading the Market Study submitted by Snavelly to IHFA). If that is the direction that Victor wants to go, fine. Do that. **But please have the common courtesy to say it outright rather than portraying the development as something it is not.**

**I would caution Council that one of the worst things you can do is build Workforce or Affordable Housing that ends up being neither for the people and the community you serve.** It will hurt the credibility of Victor's government as well as the larger project of building truly Affordable Housing. Affordable Housing requires both community buy-in and trust. If you build housing that violates that trust by not being Affordable for Teton County, Idaho's Workforce, the greater project of building Affordable Housing throughout the Valley will likely suffer.

At the very least, the City must ensure that the Development Agreement provides robust legal protection in the event that Snavelly cannot complete the project, which appears increasingly likely as the project costs have increased along with interest rates. [Another project in Boise](#), that is using the same 2023 IHFA \$4M loan, was recently stalled because of high construction costs

and the unfavorable interest rate environment. In order to ensure that public resources are being properly protected, **independent legal review of the Development Agreement, Lease Option Agreement and Design Development Plan must be conducted.**

In addition, **I ask Council to ensure the following pieces are included in the Development Agreement:**

1. A commitment to build the AMI restricted Workforce units FIRST.
2. A robust traffic mitigation plan (or, better yet, a completed Traffic Impact Study that examines the impact that these 90 units will have on HWY 33 towards Teton Pass).
3. Compliance with the terms of the \$4M loan from IHFA.
4. Commercial uses are clearly spelled out and limited (as this is now CX zone in a REC zoned park).
5. A commitment by the developer to build the childcare center, as originally promised.
6. A timeline that details Snavely's plan to sell or hold the property so that the public is informed about the future of the project.
7. Any associated parking costs must be spelled out - and there should be enough free parking that no Workforce units are required to pay.
8. Free storage for Workforce units.
9. No short term rentals.
10. Pets allowed.

**I would urge Council to table this Development Agreement until all of these issues can be worked out, the public has had ample time to read and comment on the document, and independent legal review can be performed to ensure the City is well protected moving forward.**

I have spent a lot of personal and professional time over the past three years reading about housing issues. One thing that has become abundantly clear to me is that building truly Affordable housing is exceedingly complex and that mountain towns face a unique set of housing challenges that often do not exactly parallel national trends. This complexity is why care and expertise are absolutely essential. It is okay to admit that you don't have all the answers and to actively seek advice from experts in the field. It is also okay to admit that in a rapidly changing housing market, the needs of the community may be different than they were two years ago when this process started and to adapt accordingly. In fact, that is a much preferred alternative to barreling ahead with a project that may not produce the desired outcomes.

I would like to end by reiterating the impossibility of providing any meaningful public comment on critical documents that are not yet available to the public only a week prior to the hearing.

Thank you,  
Alena McIntosh