

# Western Greater Yellowstone Regional Analysis of Impediments

**September 29, 2014**



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## INTRODUCTION

This document provides a Regional Analysis of Impediments to Fair Housing Choice (RAI) for the Western Greater Yellowstone Area (WGYA). The WGYA encompasses three counties in Idaho (Fremont, Madison and Teton) and one in Wyoming (Teton), along with the primary communities of Ashton, Island Park, and St. Anthony in Fremont County; Rexburg in Madison County; Driggs and Victor in Teton County, Idaho; and Jackson in Teton County, Wyoming.

In 2011, Fremont County, Idaho, was awarded a \$1.5 million Sustainable Communities Planning Grant through the U.S. Department of Housing and Urban Development (HUD). This grant is being used to develop the Teton View Regional Plan for Sustainable Development and will include a Model Development Code and the Greater Yellowstone Framework for Sustainable Development as a guiding, companion document.

Grantees are required by HUD to undertake Fair Housing Planning as a condition of receiving the grant and sign a certification that they are affirmatively furthering fair housing (see 24 CFR 91). This means that the grantee will:

- (1) Conduct an analysis to identify impediments to fair housing choice;
- (2) Take appropriate actions to overcome the effects of any identified impediments; and
- (3) Maintain records reflecting the analysis and actions taken.

This RAI fulfills step one and identifies actions that may be taken regionally and locally to address identified impediments in step two.

### What is a Regional Analysis of Impediments?

The Department of Housing and Urban Development is committed to eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities and other discriminatory practices in housing. The fundamental goal of HUD's fair housing policy is to make housing choice a reality regardless of race, color, religion, sex, familial status, disability and national origin through Fair Housing Planning.

An AI<sup>1</sup> is the first step in Fair Housing Planning by analyzing an area for discriminatory housing practices, whether overt or unintended; promotion of fair housing choice for all persons, including choices in housing location, type and

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<sup>1</sup> HUD developed a Fair Housing Planning Guide that assists governments in conducting an AI, as well as identifying and documenting actions to address Fair Housing impediments. See: *Fair Housing Planning Guide, Volume 1*. US Dept. of Housing and Urban Dev., Office of Fair Housing and Equal Opportunity, available at: <http://www.hud.gov/offices/fheo/images/fhpg.pdf>

condition; promotion of housing that is accessible to all persons, particularly those with disabilities; and fostering compliance with the nondiscrimination provisions of the Fair Housing Act. In this light, impediments to fair housing choice will include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

Therefore, policies, practices or procedures that appear neutral, but that operate to deny or adversely affect the provision of housing to persons in any particular protected class may constitute an impediment to Fair Housing choice.

The analysis and identification of impediments in the RAI happens both at the regional and the local level. While the RAI is written from a regional perspective, if prepared in accordance with HUD guidelines, the RAI will operate as the reference fair housing document for the consolidated and annual plans for each individual jurisdiction that was a signatory to the Regional AI. This means also that each jurisdiction is responsible for maintaining documentation of the analysis of impediments and the actions it carries out to address any identified impediments to fair housing choice in its community.

### **The Federal Fair Housing Act and Title IX Exemptions**

The Fair Housing Act, 42 U.S.C. 3601 et seq., prohibits discrimination in housing against persons on the basis of race or color, religion, sex, national origin, familial status (e.g., children in the home), or disability by direct providers of housing, such as landlords and real estate companies, as well as other entities, such as municipalities, banks or other lending institutions and homeowners insurance companies. The Act covers the sale or rental of housing, mortgage and home improvement lending, and land use and zoning practices. HUD has the primary authority for enforcing the Fair Housing Act.

Generally excluded from all or some provisions of the Act are owner-occupied homes with four (4) or fewer units; most single-family homes sold without the use of a real estate agent or broker or discriminatory advertising; housing operated by religious organizations and private clubs that limit occupancy based on religion or membership; and housing for older persons (with respect to familial status).<sup>2</sup>

Further, and of particular significance in Madison County, the Title IX Higher

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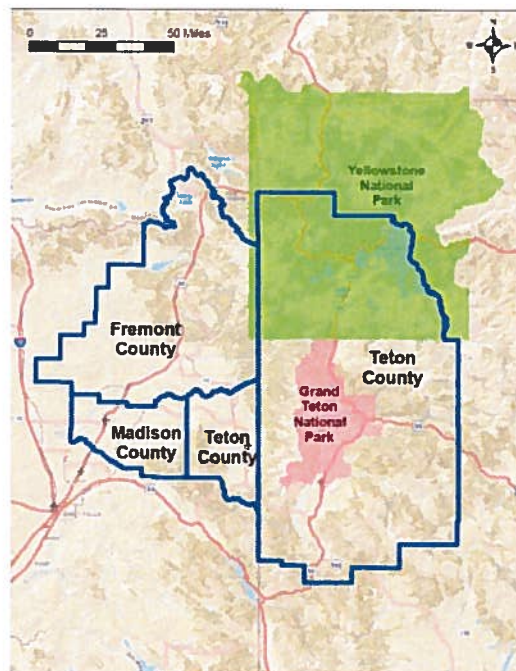
<sup>2</sup> This is a general overview. Please reference the Fair Housing Act, 42 U.S.C. 3601 et seq., for more information.



Education Act of 1972 governs housing that has been approved for student occupancy by Brigham Young University in Rexburg, Idaho (BYU-I). Single students enrolled full-time at BYU-I are required to reside in either on- or off-campus BYU-I approved housing, which maintain separate buildings for male and female occupancy. Title IX Act allows educational institutions to maintain separate living facilities for students based on gender.<sup>3</sup> BYU-I may approve such housing for students even if it is provided by another agency or organization or whether it is located on- or off-campus.<sup>4</sup>

### The WGYA Geographic Region

The WGYA area includes about 7,000 square miles in four (4) counties located in northeastern Idaho and western Wyoming, just south of Yellowstone National Park. The area can largely be characterized as rural, with an average density of just under 12 persons per square mile. The following counties and communities participated in and are covered by this RAI:



#### Fremont County, ID

- City of Ashton
- City of Island Park
- City of St. Anthony

#### Madison County, ID

- City of Rexburg

#### Teton County, ID

- City of Driggs
- City of Victor

#### Teton County, WY

- Town of Jackson

<sup>3</sup> See 20 U.S.C.1681. In 1988, a religious tenet exemption letter from Bruce Hafen, then president of Ricks College (now BYU-I), was accepted allowing BYU-I to exclusively restrict access to its university approved housing to matriculating students (34 C.F.R. 106.12(b)). Therefore, only BYU-I students are eligible to live in approved housing. See the BYU-I Approved Housing Guidebook for more information. Available at:

<http://beta.byui.edu/Documents/housing/guidebooks/Approved%20Housing%20Guidebook.pdf>.

<sup>4</sup> See 45 C.F.R. § 86.32; Wilson v. Glenwood Intermountain Properties, 876 F.Supp. 1231, 1243 (D.Utah 1995).

## Methodology

This study was completed based on methodologies recommended in HUD's Fair Housing Planning Guide, Vol. I, consultation with HUD regarding the unique rural nature of this region, and our extensive experience conducting studies in similarly rural communities in the west. The report combines both primary and secondary data sources to analyze impediments in the region. This includes:

A housing survey. A housing survey was fielded to residents and workers in the WGYA as part of this study and a parallel Regional Housing Needs Assessment conducted by our team. Surveys were conducted in English and Spanish to obtain information on housing conditions and needs which are not available from other sources. The survey was available beginning in mid-March through July 2014. Distribution methods included:

- An on-line survey in English. The link for the survey was distributed by:
  - Chambers of commerce to their membership;
  - Major employers in each county to their employees;
  - Media (newspapers, radio and TV stations);
  - Sharing via social networks; and
  - Social service and housing organizations to persons they serve.
- Paper surveys in English. These were placed in town centers, libraries and senior centers and distributed by hanging on the doors of residential units and through employers that indicated their employees had limited internet access.
- Paper surveys in Spanish. These surveys were completed with the assistance of social service agencies, school districts, employers and churches through a combination of intercept interviews and household distribution. We extend our gratitude to the Fremont County School District, Walter's Produce, regional churches, Madison County School District, Teton County School District, the Hispanic Resource Center, the Teton Valley Food Pantry, Teton Free Clinic, Latino Resource Center and Systems of Care, and all others, for their assistance in reaching Spanish-speaking residents.

The margin of error for survey tabulations is within 1.5% at the 95% confidence level. This means that, for tabulations involving the entire region, there would be 95% confidence that any given percent reported is no more than plus or minus 1.5 percentage points from what is actually the case. When results are provided independently for each county, tabulations are within 2.5% to 4%. The margins of error are higher due to smaller sample sizes.

**Key informant interviews.** More than 60 key informant interviews were conducted to acquire local housing market, occupancy and home qualification information (for affordable rentals and deed restricted ownership units); understand city and county zoning, land use and housing policies, and recent and current development trends and challenges; and understand Fair Housing trends and concerns. Interviews included:

- Realtors and appraisers (9 total);
- Rental property managers of both market rate and affordable units (38 total);
- Municipal and county planners from each of the four counties in the region and the primary cities and towns of Ashton, St. Anthony, Island Park, Victor, Driggs, Rexburg and Jackson (11 total);
- Housing and resident service agencies; and
- Local and regional Fair Housing service agencies.

Local and regional service and Fair Housing agencies interviewed included:

- Habitat for Humanity (Idaho and Wyoming);
- Teton County Housing Authority (Wyoming);
- Jackson Hole Community Housing Trust;
- Idaho Housing and Finance Agency;
- Community Resource Center (Wyoming);
- Intermountain Fair Housing Council (Idaho); and
- Wyoming Legal Services.

**Secondary data.** Data published by government, non-profit and private agencies referenced in this report includes:

- 1990, 2000 and 2010 US Census and 2008-2012 ACS 5-year estimates for population, housing unit and household characteristics. The latter is used sparingly given its potential for wide margins of error in low population communities;
- Subsidized housing and Section 8 Voucher data from the Idaho Housing and Finance Agency, the Wyoming Community Development Authority, the Idaho Falls chapter of Habitat for Humanity, the Teton County Housing Authority and the Jackson Hole Housing Trust;

- Job, labor force, unemployment and wage data from the Idaho Department of Labor, the Wyoming Department of Workforce Services and the US Bureau of Economic Analysis;
- Historical housing sales data and current listings from the Teton Board of Realtors and the Snake River MLS;
- Fair Housing complaint data from HUD, Idaho Intermountain Fair Housing Council, and Wyoming Legal Aid;
- Home Mortgage Disclosure Act (HMDA) mortgage lending data; and
- Recent legal cases from the U.S. Department of Justice and Casemaker legal research tool.

State and local studies were also reviewed, including:

- Comprehensive Plans for each county and the major communities;
- Housing Needs Assessments completed in 2007 for both Teton County, ID and Teton County, WY; and
- The Regional Analysis of Impediments completed in 2011 for both the state of Idaho and the state of Wyoming.

### **Report Format**

Background information on the counties and communities is presented in the first four sections of the RAI to understand similarities and differences encountered by persons of protected classes compared to other households, as follows:

- Population and Household Demographics. An overview of population and household characteristics and trends;
- Employment. County employment profile, including unemployment, types of jobs and salaries paid;
- Housing Profile. Housing unit inventory and tenure, including market rate and affordable homes, and cost of housing analysis; and
- Housing Problems. A review households encountering problems such as homes in need of repair, high housing costs compared to income, overcrowding, housing insecurity, availability of accessible housing and potential language barriers when searching for housing.



**Fair Housing Legal Status.** This section provides an overview of state and local fair housing laws and complaint procedures and analyzes potential housing discrimination based on data from resident survey responses and home lending practices; fair housing complaints; and recent legal cases to detect potential discriminatory issues.

**Policies and Resources.** This section reviews city, town and county land use codes and policies and Fair Housing and community services available to WGYA residents to identify any barriers to the provision of or access to Fair Housing.

**Conclusions, including Impediments and Recommended Actions.** This section identifies impediments to fair housing choice based on the analysis of primary and secondary data and review of land use policies. Recommended actions as the basis of a Fair Housing Action Plan are then presented that may be implemented to address impediments.

## **Definitions**

**Accessible Unit** – Accessible generally means that the dwelling is accessible to persons with disabilities. Mandatory requirements for accessible housing vary and are found in state, local, and model building codes, in agency regulations such as in the Department of Housing and Urban Development's program 202 and 811, section 504, and the Fair Housing Amendments Act requirements. Accessible features in dwellings may include wide doors, sufficient clear floor space for wheelchairs, lower countertops and knee spaces under counters, grab bars in bathrooms, audible and visual signals, and entrances free of steps and stairs.

**Adaptable Unit** – An adaptable dwelling unit has all the accessible features that an accessible unit has, but allows some items to be omitted or concealed until needed. This allows dwelling units to look the same as non-accessible units and be better matched to individual needs when occupied. For example, wide doors, no steps, knee spaces, grab bar reinforcing and other access features must be built in. The grab bars, however, can be omitted and installed when needed and knee spaces can be concealed by installing a removable base cabinet.

**Affordable Housing** - The commonly used standard is when the monthly rent or mortgage payment is equal to or less than gross household income. When housing costs exceed 30% of income, the household is considered to be *Cost Burdened*.

**Areas of Concentration** – Used to describe where higher than normal concentrations of certain populations reside. HUD defines areas of concentration as those in which the percentage of a specific population is 10 percentage points higher than across the region as a whole. For example, 8% of the population in the WGYA is age 65 or older; concentrations occur where this proportion is 18% or more.

Group Home – A home where a small number of unrelated people in need of care, support, or supervision can live together, such as children or young people who cannot live with their families and those who are elderly or mentally ill.

Median Family Income (MFI) <sup>5</sup> – a term that generally refers to the median incomes published annually for counties by the US Department of Housing and Urban Development (HUD). HUD uses four income categories as follows:

- *Moderate Income* – From 81% to 100% AMI.
- *Low Income* – From 51% to 80% AMI
- *Very Low Income* – Between 31% and 50% AMI
- *Extremely Low Income* – At or below 30% AMI

Overcrowded Housing – When more than two persons per bedroom on average occupy a unit.

Occupied Housing Units – Units that serve as primary residences. Homes that are vacant for rent, for sale or for seasonal/occasional/recreation use are not considered to be occupied.

Households – The same as occupied housing units. Population residing in group quarters, like dormitories, skilled nursing homes and correctional facilities are not considered to be members of households.

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<sup>5</sup> Here, MFI is used to denote HUD's Median Family Income figures. The 2014 WGYA Housing Needs Assessment conducted by our team uses "AMI" (Area Median Income) to denote the same income figures.

## CONCLUSIONS

### Identified Impediments

This research identified the following regional and local impediments to the fair provision of housing in the WGYA. The purpose of this section of the RAI is to encourage local governments to coordinate regionally where needed to overcome impediments that are multi-jurisdictional in nature, offer opportunities to achieve efficiencies in the delivery of fair housing services or have impacts beyond jurisdictional borders. It is also intended to raise awareness of local issues that may be addressed to further the provision of and access to housing in the WGYA for all residents.

#### **Impediment 1 – Not all jurisdictions have Fair Housing policies and others can be improved to better support and educate residents on Fair Housing issues.**

Idaho's Fair Housing Law does not protect based on familial status. Local jurisdictions can adopt Fair Housing policies that specify Fair Housing protections that are consistent with federal law. While this is not legally required, resident outreach conducted in noticing and advertising the adoption of such policies helps educate residents on Fair Housing protections. Policies can also provide additional support and less expensive alternatives than filing a federal court case to those who feel they have been discriminated against, such as the policy in St. Anthony and Teton County, Idaho. Policies may also set up county support and Fair Housing educational programs for residents and businesses.

Protections for persons based on income source could also be added to improve the ability for Voucher and other subsidized renters to find housing. Landlords in localities that do not offer this protection may lawfully deny housing to Voucher holders. This could affect the Voucher residents in Idaho.

No Voucher holders reside in Teton County, Wyoming. A program was attempted in the 1990's. Difficulties were encountered due to the scarcity of rentals available, high cost of development, high rents and landlords being either unable or unwilling to keep up with necessary repairs. If Teton County wants to again explore this program, adopting income source protections in a Fair Housing policy may assist; although rents are likely too high in light of federal cutbacks to the program.

#### **Impediment 2 – Residents experience discrimination.**

About 1,150 households (4%) in the WGYA indicate that at least one person in their home has experienced some form of discrimination when buying, selling or renting a home. Family type, age, religion and disability complaints were the most common. This varies slightly by county. Residents in Teton County, Wyoming, experienced the most discrimination, likely related to scarce housing availability and a somewhat

knowledgeable resident base – the area has many local Fair Housing service agencies. A few problems noted by residents involved different rents charged for male and female tenants; landlords not accepting children or, alternatively, single or unmarried tenants; and religion affecting home sales transactions.

Complaints filed by HUD and cases taken by the IFHC in the region also focus mostly on disability issues – service animals being a dominant issue.

While some forms of discrimination may be intentional, other acts of discrimination reflect a lack of knowledge and understanding on the part of landlords. There is a need for expanded fair housing training and routine continuing education for landlords, property managers, real estate agents, lenders and other housing professionals.

**Impediment 3 – Loan denial rates are higher for certain protected classes in some areas of the region, including Hispanic/Latino and female loan applicants.**

Hispanic loan applicants were denied loans at twice the rate of non-Hispanic applicants in both Madison and Fremont counties. Females were also denied loans at twice the rate of males in Fremont County. Other counties did not exhibit these differentials. The reasons for this disparity should be probed.

**Impediment 4 – Persons with disabilities are occupying homes that do not meet their accessibility needs.**

A lack of affordable, accessible units is an impediment to persons with mobility disabilities. All counties and communities incorporate the International Building Code standards for developing ADA accessible units. All affordable LIHTC, RD and Section 8 rental projects also noted that over 50% of their units are either accessible or adaptable, with about 15% of these occupied by persons with disabilities. Despite this, a significant percentage of households with at least one person with a disability stated that their current housing does not accommodate their disability (21%). Madison County had the lowest percentage of households with this problem (13%); Teton County, Wyoming, had the highest percentage (30%).

This indicates that persons with disabilities are either not locating suitable housing or may occupy older homes that are in need of upgrades. Based on survey comments, the most common problem are stairs, either within or accessing units; non-wheel chair accessible entry-ways or bathrooms; inappropriate parking; and problems accessing drawers and cabinets.

**Impediment 5 – Residents have limited access to and availability of government and other services in some areas.**

Transportation. There is a lack of scheduled public transportation routes within some counties and cities and limited transport between the counties in the region. Only Teton County, Wyoming, has a regular bus service within the town of Jackson and to Teton Village, with a couple of commuter routes that connect to Teton County, Idaho, and to Lincoln County, Wyoming, to the south. On-call service is available for seniors and persons with disabilities from various providers in Idaho, but no fixed public bus routes serve the WGYA in that state.

Public transportation can be a necessary service for seniors who can no longer drive, low-income residents with limited or no access to a personal vehicle, and persons with disabilities and limited mobility. Students in Rexburg have also been supportive of creating a fixed route line in the city. It can also decrease commute costs for workers traveling between counties, which in Teton County, Idaho, can run an average of about \$1,000 per month per commuting household.

Education. The junior high school in Driggs was at or near capacity in the mid-2000's. Families have grown in Victor and Driggs since then.

There are no schools serving families living north of Ashton – i.e. in the Island Park area. Fremont County shows only modest growth in families in recent years, but the largest percentage increase has been in the northern Island Park area. The student population is relatively small, but changes in this population should be monitored to understand potential future education needs in this area.

Adequately serving the needs of the growing Hispanic/Latino population is a concern in all counties. In the mid-2000's, Teton County, Idaho, schools were having a hard time keeping up with the programs needed to serve the quick rise in the Hispanic/Latino population – offering English as a second language, for example, and maintaining their existing curriculum. This population continues to increase throughout the WGYA.

Medical. The last hospital in Fremont County closed in 1988. It has the highest senior and disabled population – particularly Ashton and St. Anthony, the latter of which is an area of concentration for persons with disabilities. Medical clinics and Emergency Medical Services are available in each of these cities, as well as senior care facilities in Ashton and St. Anthony. Changes in the senior population should continue to be monitored in light of available and economically viable medical services.



**Impediment 6 – Jurisdictions can improve some aspects of their development codes to help incent or create fair access to and provision of a diversity of housing for residents.**

Group Homes. Idaho state code prohibits governments from excluding group homes from their communities through zoning restrictions. It also defines a “single family dwelling” for the purpose of any zoning law, ordinance or code to include “any group residence in which eight (8) or fewer unrelated persons with disabilities or elderly persons reside . . .”. Idaho Code § 67-6531. A few Idaho jurisdictions either do not define group homes, do not provide for them in their code, or have different definitions than the state. The state of Wyoming does not have a similar provision; however, both Teton County and the town of Jackson provide for group homes, yet define them differently.

Accessory Dwelling Units. Accessory dwelling units are permitted in all jurisdictions, but to varying degrees and for different purposes. Some jurisdictions could consider modifications to their codes to better utilize these units to diversify their housing stock for renters and add to their pool of affordable units.

Multi-Family Densities. Zoned and permitted densities vary widely in the region, with the highest densities permitted in Rexburg and the lowest densities in the unincorporated county agricultural zones. Most jurisdictions could look at altering their permitted densities to better meet their housing needs in light of any land or infrastructure constraints in their community.

- Several communities could use more multi-family units to diversify their housing stock, such as Driggs, Victor and communities in Fremont County. LIHTC and senior housing rentals in St. Anthony and Ashton are near full capacity and density options could incent needed development.
- Other communities, such as Rexburg, which could likely double in size under current zoning and has had the majority of their development in the 2000’s in large multi-family apartment projects, should look at preserving lower density single family and duplex, or four-plex options to retain a balance. Ownership housing decreased as a percentage of occupied homes by 11 percentage points in the 2000’s. Rexburg needs to preserve lower density ownership opportunities in light of this trend.
- The town of Jackson, which also has many multi-family units, however, should consider increasing densities given the shortage of land in the area, the strong and continuing demand for workforce housing and their policy to house 65% of their workforce. Jackson has not been meeting its share of workforce housing in light of strong job creation.

**Impediment 7 – Jurisdictions can improve access to affordable homes through various programs that expand the inventory for households in need and improve and preserve existing homes.**

Jackson and Teton County, Wyoming, have the most extensive housing production programs and development requirements of all other WGYA jurisdictions. These counties still have the tightest rental market, highest priced ownership market and are struggling to keep pace with rising jobs. Development and redevelopment constantly threatens to reduce the existing affordable housing stock in the area.

Driggs and Victor in Teton County, Idaho, both have incentives for affordable housing development in their codes that have yet to be used. The 50% increase in housing units experienced in the 2000's did not improve affordability of homes in the area, but did increase second homeownership. Older mobile homes are undergoing renovation and inspection, threatening displacement of low-income households.

Fremont County has the most affordable rents and second most affordable homes (next to Madison County), but has an old housing stock. Its affordable senior rentals (LIHTC/RC/Section 8) are fully occupied and this population is growing. Renovation of older housing stock is of concern. Hispanic/Latino residents are concentrated in St. Anthony and Teton and could take great advantage of home renovation assistance and mobile home replacement programs.

Madison County has a high percentage of multi-family units, predominately large apartment complexes, plus a large inventory of LIHTC/RC/Section 8 rentals, primarily in Rexburg. Single-family homes comprise a shrinking proportion of homes in the city and county. Home prices are the most affordable for residents compared to other WGYA jurisdictions. Continued growth of the BYU-I student body indicates that these patterns will continue. Madison County, and Rexburg in particular, needs to focus on preserving existing ownership opportunities, diversity of housing options (e.g. not apartments) and putting new homeowners into homes.

These findings are defined in detail in the 2014 WGYA Housing Needs Assessment, which should be referenced for more information.

**Impediment 8 – Information on affordable and market rentals in the region can be better coordinated to reach a broader range of residents, including Spanish-speaking residents.**

Affordable LIHTC, RD and Section 8 rentals exist in all counties within the WGYA. Various organizations manage these units. Several of the units in Idaho are owned by management companies in distant cities, including Boise, Idaho, and Eagle, Idaho. Finding local information and discovering whom to contact can be a challenge and much more so for Spanish-speaking residents or other low income or disabled

households with limited access to resources (e.g., computer) or mobility to be able to visit properties. A few complexes only advertised units through word-of-mouth.

All counties have room for improvement in terms of communicating information to persons of limited English proficiency. Rental advertisements, when provided, were provided only in English; between 50% to 70% of leasing offices have either a bi-lingual person on staff or access to an on-call interpreter; and over one-half of affordable rental managers and only one-fifth of market-rate rental managers have leases available in both English and Spanish. About 7% of Spanish-speaking survey respondents that had problems finding housing indicated language was a barrier.

### **Recommended Actions to Address Impediments**

This section of the AI identifies specific actions that can be taken both regionally and locally to address identified impediments to fair housing choice.

#### Fair Housing Policy and Education

**Local Action Item: Adopt a Fair Housing policy that specifies protections for at least the same classes as federal law.**

This provides consistency and helps educate residents, professionals and public service providers. Additional protections can be added, such as for LGBT residents (as done in Victor), or for income source. Local remedies and procedures for violations can also be provided, providing options to residents with discrimination claims.

**Local and Regional Action item: Increase opportunities for Fair Housing education of residents and real estate professionals in jurisdictions.**

Jurisdictions can coordinate trainings to reach residents and real estate professionals regarding Fair Housing issues. Intermountain Fair Housing Council (IFHC) and Access to Justice in Jackson and Wyoming Legal Services could assist with the education programs, including in Spanish and English. This can reduce discrimination by educating landlords on the laws and residents about their rights, for example.

#### Lending

**Local Action Item: Work with lenders to mitigate loan denial disparities and educate residents about financial repair.**

Fremont County should examine why Hispanic applicants have much higher loan denial rates than non-Hispanic applicants and females than males. Using this information, the county should work with local lenders, developers and funders to

develop programs that will, for example, assist Hispanics with repairing credit histories, provide downpayment assistance and interest rate buydowns.

Madison County should employ similar action with regard to disproportionately high loan denials for Hispanic applicants.

#### Accessible Homes

**Local Action Item: Improve resident education about the availability of ADA accessible and adaptable units and support programs that help households with disabilities afford needed renovations.**

Habitat for Humanity is newly active in Fremont County with plans to expand service into Madison and Teton counties in Idaho. Habitat has been active in Teton County, Wyoming, for many years. Explore partnerships and opportunities to leverage resources with Habitat for Humanity to provide low-cost renovation of homes.

Conduct resident outreach to inform residents of accessible units, where they are located and how they may access them. Include in this options for assistance to make renovations, including any new programs with Habitat for Humanity or other government-funded assistance. Outreach could occur, for example, through area medical centers, senior centers, town centers, and resident service providers.

Educate property managers on matching resident needs with available units, either upon initial entry into a project or when a suitable vacancy arises for an existing tenant.

#### Government and Other Services

**Local and Regional Action Item: Evaluate improving transportation options available to residents to provide access to services and options to commuters.**

The region is working on a transportation feasibility study and exploring options for region-wide transit. The needs of county and city and town residents should be incorporated into this review.

Explore options to expand commuter bus service between Teton County, Idaho, and Teton County, Wyoming. This may include providing additional travel times for service – earlier in the morning and/or later in the evening. Explore additional pricing options to reduce rates for frequent commuters or potentials for subsidies from Wyoming employers to help reduce commute costs for their workers.

Review potential for a fixed-route bus line in Rexburg. The substantial student population could help support the line and it would serve others in the community in need (seniors, persons with disabilities, etc.).

Review potential for transit between Rexburg and Fremont County. This would both serve students who rent in St. Anthony, as well as the seniors and concentrated population of persons with disabilities in the city. It would also help commuters from Fremont County get to their job in Madison County. Routes accessing Madison Memorial Hospital and BYU-I campus would be of benefit.

**Local action item: Evaluate expanding education capacities in Teton County, Idaho, and ensure resources are sufficient to serve students with limited English proficiency in all jurisdictions.**

Review the potential need to expand capacity in schools in Victor and Driggs to serve the growth in households with children. As this area continues to be attractive to Wyoming working families, this growth will only continue.

Ensure all districts (in Idaho and Wyoming) have necessary resources to meet the needs of the increasing Hispanic/Latino population, including limited English proficiency courses and parent communication and outreach.

#### Development Codes

**Local Action Item: Modify group home provisions to provide consistency with Idaho state law, where applicable, and among jurisdictions.**

The city of St. Anthony and Madison County should incorporate group home provisions pursuant to IC 67-6531 into their development codes so they are adequately defined for consistency.

Teton County, Idaho, defines group homes differently than I.C. § 67-6531 and requires a conditional use permit process when permitted. The cities of Driggs and Victor incorporate the state's definition, but each requires a conditional use permit process or special use process for approval. These jurisdictions should review this restriction in light of Idaho state code and ensure it meets the requirement that "use of property for the care of eight (8) or fewer persons with disabilities or elderly persons is a residential use of such property for the purposes of local zoning." Idaho Code § 67-6530.

Teton County, Wyoming, and the town of Jackson both permit group homes within their development codes as an "institutional residential" use, but have slightly different definitions. To reduce confusion among developers, the town and county should explore using a common definition.



**Local action item: Review and modify zoned densities to ensure needed diversity in type and affordability of product.**

The City of Island Park. Island Park has among the largest lot requirements of all jurisdictions, in part necessitated by the limited services and topography of the community. Island Park should identify potential sites within and near city boundaries for higher density development, such as needed seasonal worker housing, and consider flexible performance zone policies within the city and other options to permit and assist or incentivize such development.

St. Anthony and Ashton. Densities in these towns are also relatively modest. Recent demand for residential development activity, however, has been hard pressed to support more dense development in recent years. The towns may consider density incentives for projects they would like to see be developed – such as for more affordable senior housing or LIHTC rentals. To diversify the housing stock, densities can be reviewed for attached ownership product, such as townhomes or small duplex or four-plex homes.

Driggs and Victor. A model code for Teton County, Idaho, and the cities of Victor and Driggs is under development that is anticipated to allow smaller lot sizes, revised accessory unit standards and smaller scale housing. Both regions could use more multi-family housing to diversify their predominately single family housing stock, and preferably more affordable units near town and services. Allowing mixed-use development in city centers can help diversify the housing stock and maintain vibrancy. Locating areas for more LIHTC rentals would also serve local workers earning local wages in the region, including the growing Hispanic/Latino population employed largely in resident and tourist service jobs and agriculture.

Rexburg. Rexburg should ensure that continued large-scale apartment and multi-family units development does not displace other housing options for those who work in the community. Rexburg may want to consider downzoning areas where they want to preserve smaller scale neighborhoods and possibly incentivize larger scale development in other areas of the city. The town should work with BYU-I to coordinate the needs of both the city and the university and ensure zoning and development meets the needs of the whole community rather than just certain segments.

Jackson. Jackson should review its zoned densities in light of the town goal to house 65% of its workforce, as well as its immediate need for more affordable rental units. Current densities on limited available land for construction may not be in line with town goals.

**Local Action Item: Review options to increase, preserve, and rehabilitate affordable and resident-occupied housing, as needed, in each jurisdiction.**

Many of these options are presented in the 2014 WGYA Housing Needs Assessment, which should be consulted for more community-specific actions. In general:

- Jackson and Teton County, Wyoming, should explore more incentives to build housing, no net loss of units, resident relocation assistance, expand the first-right of refusal purchase regulations for tenants residing in converted apartments, modification of ADU standards for affordable housing, renovation programs/assistance.
- Fremont County should explore down payment assistance, renovation/weatherization programs, work with Habitat for Humanity – including helping with community outreach and boosting support for their program, explore the option for more affordable senior units in St. Anthony or Ashton and mobile home repair and replacement programs.
- Teton County, Idaho, should again explore forming a housing authority. The cities should modify their existing affordable housing incentives in light of present development conditions. The jurisdictions can encourage accessory units, explore fee waivers for affordable units, work with Habitat for Humanity to renovate existing stock and provide entry homeowner opportunities, develop affordable rentals in/near city centers, and establish renovation/weatherization programs. They should also work to preserve existing affordable homes and provide protections for tenants affected by redevelopment – such as relocation requirements or assistance.
- Madison County and Rexburg should focus on preserving and protecting homeownership opportunities. Down payment assistance programs to get low-income renters/newly graduated students into homes, work with Habitat for Humanity to build and renovate homes, renovation and weatherization programs, no net loss of units provisions to replace owner occupied units lost due to apartment redevelopment.

**Rental Information**

**Local Action Item: Provide a coordinated resource for renters to locate information about rental properties and options – including low income and market rate rentals - that reach all community members.**

This could be through a centrally-hosted website, newsletters, primary employers and local service centers. Information should be presented in English and Spanish and provide contact information, location and details regarding who the property serves when applicable (e.g., students, LIHTC, etc.).

## POPULATION AND HOUSEHOLD DEMOGRAPHICS

This section provides a review of population and household characteristics in the counties and communities participating in the RAI. It includes an analysis of protected class concentrations in the region as required by HUD. Data from the 100% Census years are primarily used (1990, 2000 and 2010), with supplement from the 2008-2012 ACS 5-year estimates and 2014 Housing Survey, as needed.

Given the rural nature of the WGYA – about 83,000 persons residing in 7,000 square miles (or just under 12 persons per square mile) – data is analyzed at the city, town and unincorporated Census Designated Place (CDP) level rather than the census tract level. This is for several reasons.

- Cities, towns and CDPs provide more detailed information on where protected populations live and their relative concentrations than census tracts in this rural region. Teton County, Idaho, consists of only one census tract; however, it has three incorporated cities. Only Madison County has more census tracts than cities – the city of Rexburg is divided among four census tracts. Where protected classes show variation within these tracts, such is noted in the text.
- ACS 5-year estimates have high margins of error in the low-population counties and communities and census tracts. Survey data collected as part of this and the parallel WGYA Housing Needs Assessment study provides information based on locality. For consistency, all data is reported at the locality (town, city, or CDP) level.
- With few exceptions, the unincorporated counties (outside of CDPs) are primarily large-lot, single family homes and/or large agricultural parcels, meaning this area does not lend itself to concentrations of any significant density of populations.

### WGYA Census Tracts vs. Cities, Towns and CDPs by County

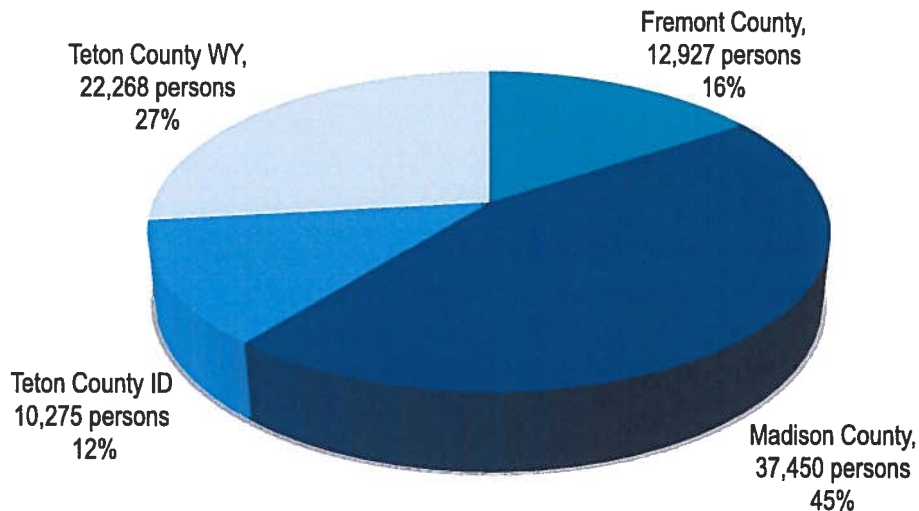
Number of:	Fremont County, ID	Madison County, ID	Teton County, ID	Teton County, WY
<b>Census Tracts</b>	3	6	1	4
<b>Cities, towns, CDP</b>	8	2	3	9

Source: 2010 US Census

## Population

In 2013 about 82,920 persons resided in the WGYA. About 45% lived in Madison County, Idaho, 27% in Teton County, Wyoming, and the rest in Fremont (16%) and Teton Counties (12%) in Idaho.

**Population Distribution in WGYC: 2013**



Source: 2013 Census Population Estimates

The WGYA added about 33,000 persons between 1990 and 2010, growing at a rate of 29% during both decades. About 42% of these persons were added in Madison County, 34% in Teton County, Wyoming, 21% in Teton County, Idaho, and 6% in Fremont County. The rates of growth in each county show significant variation:

- Teton County, Idaho, grew at the fastest rate – over 70% during each decade. This was fueled by increased jobs, growth in the Grand Targhee Resort area, and demand from workers in Teton County, Wyoming, looking for more affordable homes. Victor grew over 560%, from under 300 persons in 1990 to over 1,900 today;
- Madison County showed modest growth in the 1990's (16%), but then picked up in the 2000's (37%), with 81% of this growth occurring within the city of Rexburg. The two-year college in Rexburg, formerly known as Ricks College, officially became BYU-I in 2001, a four-year university, fueling the rapid growth in the 2000's;<sup>6</sup>

<sup>6</sup> Student enrollment increased from about 8,900 in 2000 to over 15,000 in the fall of 2013. Enrollment is projected to increase to about 20,600 students in 2018 (or by about 1,000 students per year).

- The population in Teton County, Wyoming, grew by 63% in the 1990's. The growth rate dropped to 17% in the 2000's. For fear of losing the community's character, Teton County, Wyoming, adopted land development regulations in 1994 to manage the significant growth that was occurring. Land regulations and the increased scarcity of developable private land (97% of the county is federal land) assisted the slower growth of the 2000's; and
- Fremont County had the slowest growth rate, increasing 12% in the 2000's. The city of Island Park shows the most growth, increasing over 33% in each decade; however, this equates to only 127 additional persons.

**WGYA Population: 1990 to 2013**  
**Counties and Cities/Towns**

	1990	2000	2010	2013	% Change 1990-00	% Change 2000-10
<b>WGYC Region</b>	49,222	63,536	82,242	82,920	29%	29%
<b>Fremont County, ID</b>	10,937	11,819	13,242	12,927	8%	12%
<b>Ashton</b>	1,114	1,129	1,127	1,084	1%	0%
<b>Island Park</b>	159	215	286	276	35%	33%
<b>St. Anthony</b>	3,010	3,342	3,542	3,465	11%	6%
<b>Madison County, ID</b>	23,674	27,467	37,536	37,450	16%	37%
<b>Rexburg</b>	14,302	17,257	25,484	26,520	21%	48%
<b>Teton County, ID</b>	3,439	5,999	10,170	10,275	74%	70%
<b>Driggs</b>	846	1,100	1,660	1,657	30%	51%
<b>Victor</b>	292	840	1,928	1,938	188%	130%
<b>Teton County, WY</b>	11,172	18,251	21,294	22,268	63%	17%
<b>Jackson</b>	4,472	8,647	9,577	10,135	93%	11%

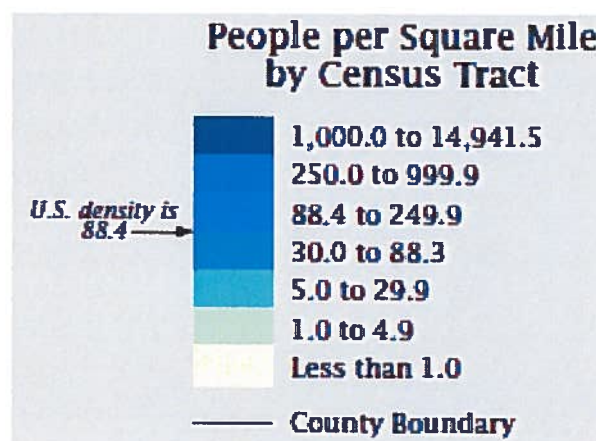
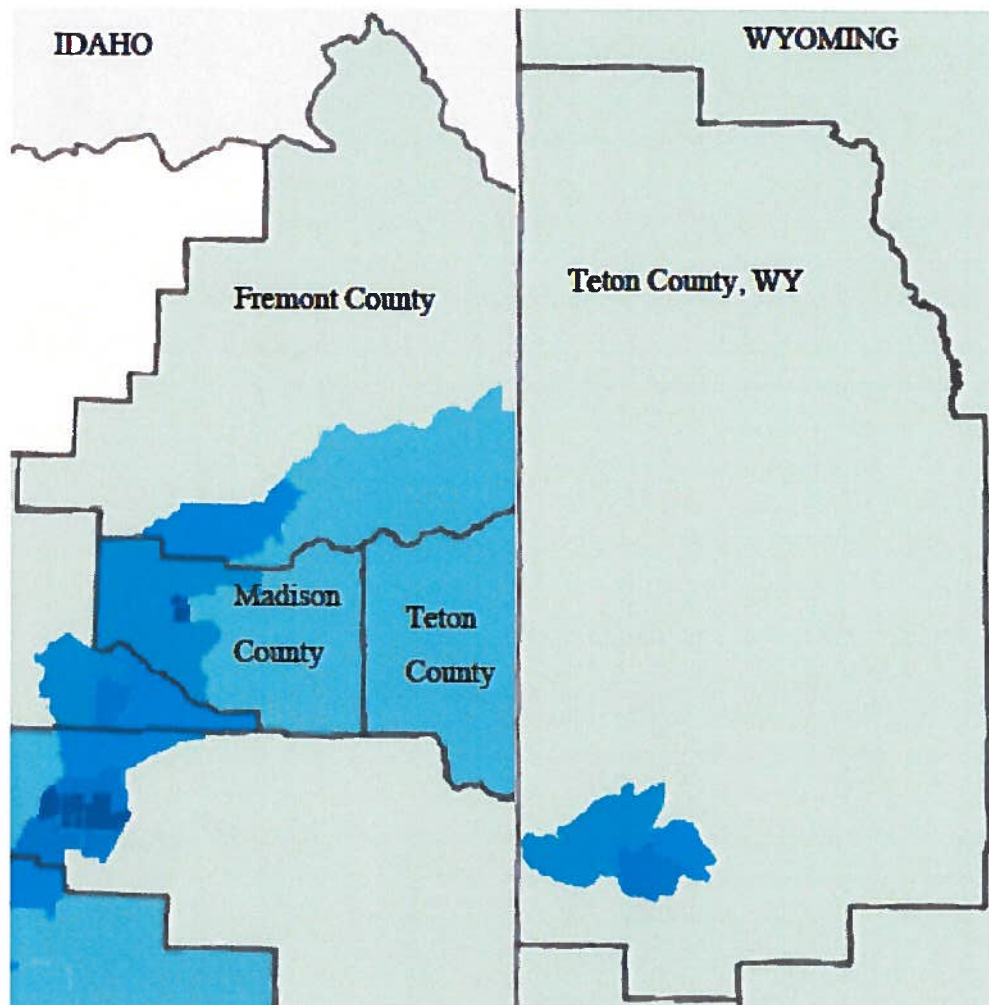
Source: 1990, 2000, 2010 US Census; 2013 Census population estimates

The population is unevenly distributed throughout the WGYA. As shown on the following map:

- The area north of Ashton in Fremont County and much of the unincorporated area in Teton County, Wyoming, average less than five persons per square mile.
- The most populated area of Fremont County is in and around St. Anthony, with between 88 and 250 persons per square mile.
- Rexburg in Madison County has the densest population in the WGYA.



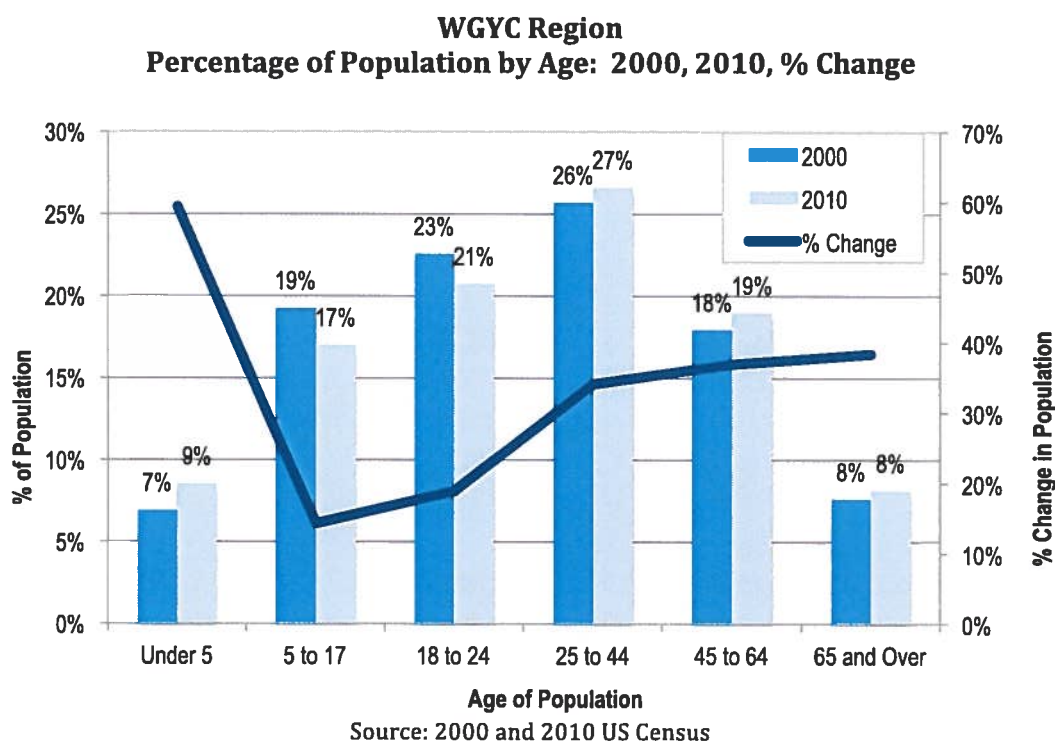
**Population Density by Census Tract: WGYA 2010**



## Age of Population

The proportion of residents between the ages of 5 and 24 declined in the WGYA between 2000 and 2010, whereas the proportion of residents under 5 and over 25 increased. The largest percentage increase occurred at the two extremes – for persons age 5 and under (59% increase) and those age 65 and over (38% increase). Compared to the states of Idaho and Wyoming:

- The percentage of college-aged residents (between 18 and 24) is high (21%). About 10% of residents in both Idaho and Wyoming are in this age group;
- The percentage of residents between 45 and 64 is low (19%) compared to the states of Idaho (25%) and Wyoming (28%) as a whole; and
- The percentage of seniors age 65 and over is low (8%). About 12% of the population in both Idaho and Wyoming are seniors.



When evaluated by area, it is apparent that:

- The high proportion of college-aged residents (18 to 24) in the area is related to the students in Rexburg (49% of the population). The town of Jackson also attracts this age group (14%) through seasonal park, ski resort and other

tourism-related jobs. The proportion of the population in this age group in all other areas is similar to the state averages (10%);

- Residents under 5 increased faster than the population as a whole in all counties and cities/towns, with the cities of Victor (205% increase) and Rexburg (138% increase) topping the list;
- Not surprisingly, young adult residents, age 25 to 44, also increased the most in Victor (165%) and Rexburg (147%), as these households are the most likely to have young children. Victor has been attracting young families employed in Teton County, Wyoming, due to comparatively lower housing prices. Rexburg is influenced by BYU-I, both in attracting students and providing jobs for young families;
- Areas in Fremont County and in Teton County, Wyoming, lost residents between the ages of 5 and 24. These populations increased in both Madison County and Teton County, Idaho, although at slower rates than the population as a whole in each county;
- Seniors age 65 and over grew at a faster rate than the population as a whole in both Fremont County (26% vs. 12%, respectively) and Teton County, Wyoming (66% vs. 17%). Only the town of Jackson (18% increase) and the city of Island Park (55%) show this same relationship. This can be attributed in part to an aging population and second homeowners retiring to their homes in Teton County, Wyoming, and Jackson and the Island Park area.
- Fremont County has the highest percentage of seniors of all counties in the region (14%). About 16% of the population in the city of Ashton, city of Island Park and the unincorporated county are seniors.

**Percentage of Population by Age:  
2000, 2010 and % Change**

<b>2000</b>	<b>Under 5</b>	<b>5 to 17</b>	<b>18 to 24</b>	<b>25 to 44</b>	<b>45 to 64</b>	<b>65 and Over</b>
<b>Fremont County, ID</b>	8%	25%	9%	25%	20%	12%
<b>Ashton</b>	8%	25%	8%	25%	17%	17%
<b>Island Park</b>	4%	15%	11%	27%	28%	13%
<b>St. Anthony</b>	10%	23%	10%	27%	18%	11%
<b>Madison County, ID</b>	7%	19%	40%	16%	12%	6%
<b>Rexburg</b>	6%	12%	57%	12%	8%	5%
<b>Teton County, ID</b>	9%	23%	8%	34%	19%	7%
<b>Driggs</b>	8%	23%	11%	35%	16%	8%
<b>Victor</b>	10%	22%	7%	38%	16%	8%
<b>Teton County, WY</b>	5%	15%	10%	38%	25%	7%
<b>Jackson</b>	5%	13%	14%	44%	18%	6%
<b>2010</b>	<b>Under 5</b>	<b>5 to 17</b>	<b>18 to 24</b>	<b>25 to 44</b>	<b>45 to 64</b>	<b>65 and Over</b>
<b>Fremont County, ID</b>	9%	23%	8%	24%	23%	14%
<b>Ashton</b>	9%	24%	7%	24%	21%	16%
<b>Island Park</b>	6%	13%	6%	24%	34%	16%
<b>St. Anthony</b>	11%	21%	10%	27%	21%	10%
<b>Madison County, ID</b>	10%	16%	36%	21%	11%	6%
<b>Rexburg</b>	10%	11%	49%	20%	7%	4%
<b>Teton County, ID</b>	10%	20%	7%	34%	23%	7%
<b>Driggs</b>	10%	20%	9%	34%	21%	7%
<b>Victor</b>	13%	19%	6%	43%	15%	4%
<b>Teton County, WY</b>	6%	13%	8%	35%	28%	10%
<b>Jackson</b>	7%	11%	12%	44%	21%	6%
<b>% Change 2000-2010</b>	<b>Under 5</b>	<b>5 to 17</b>	<b>18 to 24</b>	<b>25 to 44</b>	<b>45 to 64</b>	<b>65 and Over</b>
<b>Fremont County, ID</b>	17%	3%	-7%	7%	28%	26%
<b>Ashton</b>	4%	-4%	-7%	-4%	21%	-9%
<b>Island Park</b>	89%	15%	-25%	19%	61%	55%
<b>St. Anthony</b>	15%	-5%	6%	8%	18%	-3%
<b>Madison County, ID</b>	84%	18%	25%	77%	31%	26%
<b>Rexburg</b>	138%	28%	27%	147%	34%	11%
<b>Teton County, ID</b>	93%	46%	37%	73%	104%	48%
<b>Driggs</b>	87%	30%	29%	48%	95%	30%
<b>Victor</b>	205%	96%	114%	165%	111%	11%
<b>Teton County, WY</b>	36%	4%	-5%	8%	29%	66%
<b>Jackson</b>	33%	-3%	-7%	11%	25%	18%

Source: 2000 and 2010 US Census

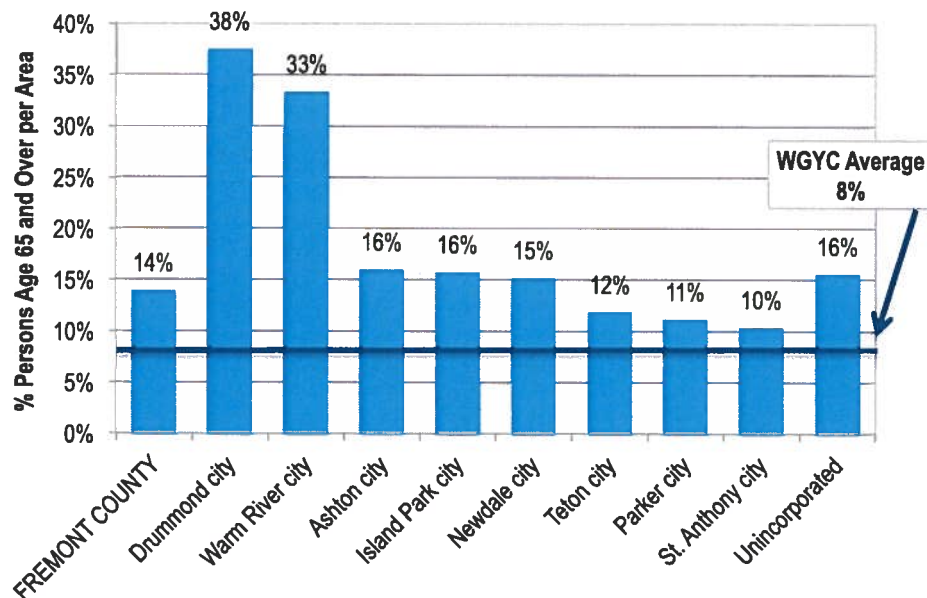
All cities, towns and CDPs were analyzed in the area to determine where the highest concentrations of seniors reside in the WGYA. This is important because it can affect the types of housing and services needed by the resident populations, such as access to nursing and medical care and alternative transportation options.

For the WGYA, where 8% of the population is 65 or older, concentrations (as defined by HUD) occur where the proportion is 18% or more. As shown below:

- There are no notable concentrations of seniors in the region. The populations in Warm River and Drummond in Fremont County are each over 33% seniors; however, only seven (7) seniors reside in these communities in total. About 18% of the population in Teton Village, Wyoming, are seniors (61 total). These areas combined comprise only 1% of seniors in the region.
- No areas in Madison County exceed 10% seniors, including the census tracts, and all areas in Teton County, Idaho, are 7% or below.
- About 17% of the population in the unincorporated area of Teton County, Wyoming, are seniors. While not technically high enough to be defined as a concentration, this equates to 29% of the senior population in this county.

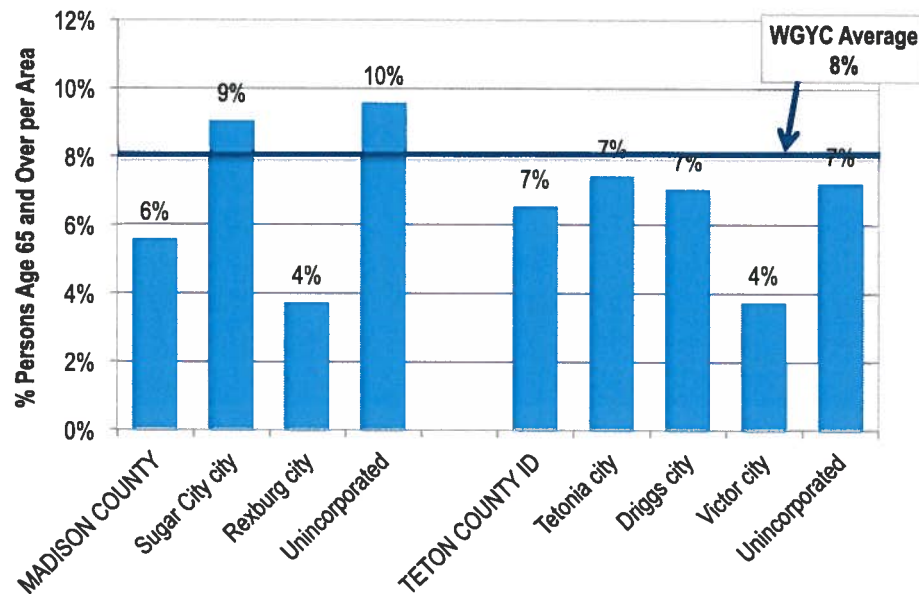
#### Percent Age 65 and Older by City/Town/CDP: 2010

##### Fremont County

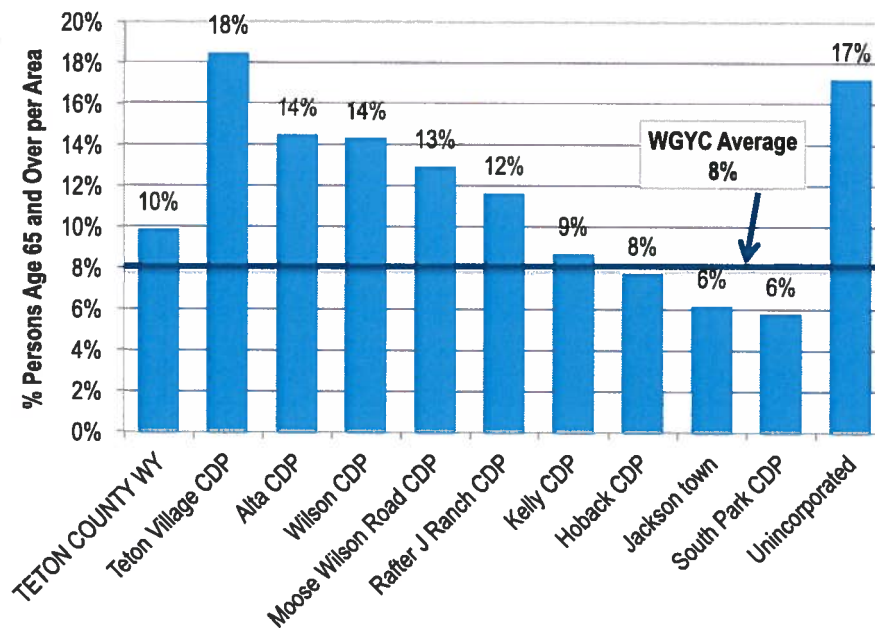




### Madison and Teton Counties, Idaho



### Teton County, Wyoming



Source: 2010 US Census

## Race/Ethnicity

The WGYA has never had a racially diverse population. In 2010, about 91% of the population was white, down from about 94% in 2000. Asian, American Indian/Alaska Native, and Black/African American residents combined comprise 1,300 residents, or 1.6% of the population in the region.

**Population by Race: 2000 and 2010**

WGYC Region	2000		2010		% Change 2000-2010
	#	%	#	%	
TOTAL Population	63,536	100%	82,242	100%	29%
White	59,594	93.8%	74,620	90.7%	25%
Black or African American	121	0.2%	305	0.4%	152%
American Indian and Alaska Native	280	0.4%	338	0.4%	21%
Asian	309	0.5%	664	0.8%	115%
Native Hawaiian/Other Pacific Islander	77	0.1%	95	0.1%	23%
Some other race	2,437	3.8%	4,974	6.0%	104%
Two or more races	718	1.1%	1,246	1.5%	74%

Source: 2000 and 2010 US Census

Persons of Hispanic or Latino descent are more prevalent. Where this population used to reside only seasonally in the area, persons of Hispanic/Latino descent have been making the WGYA their permanent home in recent decades. In 2010, persons of Hispanic descent comprised almost 11% of the region's population, which is similar to that in the state of Idaho (11%) and higher than in Wyoming (9%). While the growth of this population was greater in the 1990's than the following decade, this population still more than doubled in the 2000's, accounting for 25% of the population growth in the region. By area:

- The strongest growth has been in Teton County, Wyoming. About 66% of the total population growth in the 2000's were persons of Hispanic descent;
- The city of Victor has had the strongest growth of all cities and towns in the region and presently houses about 14% of this population; and
- The growth of this population picked up in Madison County in the 2000's after comparatively modest growth in the 1990's.

**Population of Hispanic/Latino Ethnicity by Area: 1990, 2000, 2010**

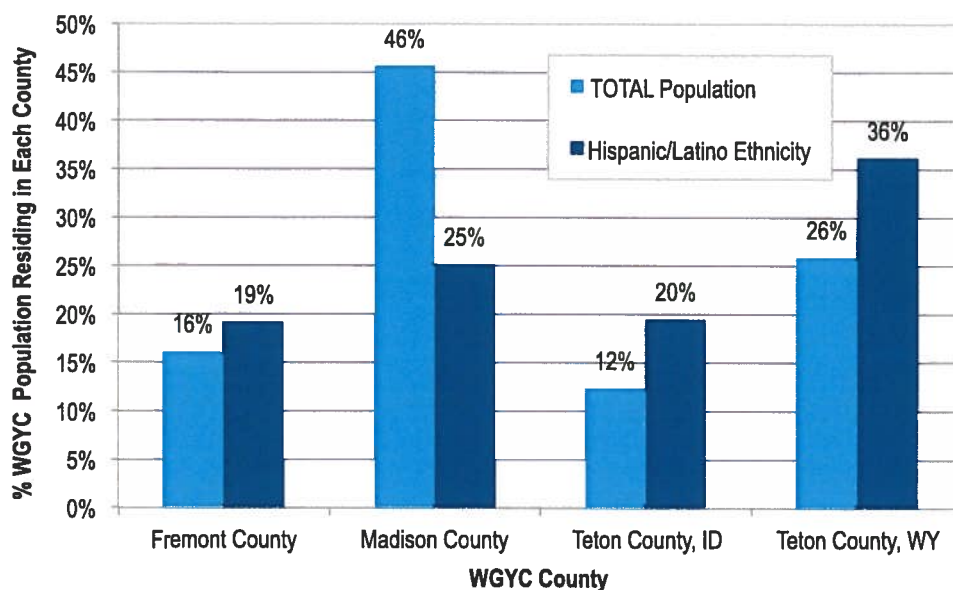
	1990	2000	2010	% Change 90-00	% Change 00-10
<b>WGYC Region</b>	1,910	4,223	8,824	121%	109%
<b>Fremont County, ID</b>	762	1,255	1,694	65%	35%
<b>Ashton</b>	149	157	198	5%	26%
<b>Island Park</b>	5	9	19	80%	111%
<b>St. Anthony</b>	179	514	741	187%	44%
<b>Madison County, ID</b>	753	1,078	2,218	43%	106%
<b>Rexburg</b>	441	697	1,435	58%	106%
<b>Teton County, ID</b>	237	705	1,721	197%	144%
<b>Driggs</b>	74	226	525	205%	132%
<b>Victor</b>	4	90	435	2150%	383%
<b>Teton County, WY</b>	158	1,185	3,191	650%	169%
<b>Jackson</b>	81	1,024	2,607	1164%	155%

Source: 1990, 2000, 2010 US Census

Comparing the distribution of the Hispanic/Latino population in the region to the overall population distribution by county, we find that:

- Madison County houses significantly fewer Hispanic/Latino persons relative to its share of the overall population in the WGYA – 25% versus 46%, respectively;
- The two Teton Counties house disproportionately more persons of Hispanic descent than their share of the population in the region; and
- Fremont County houses a similar percentage of the two populations.

**Distribution of Population by Hispanic/Latino Ethnicity:  
WGYA Counties, 2010**



Source: 2010 US Census

An AI must determine whether there are concentrations of race and ethnicity in an area as compared to the regional average to understand patterns of segregation, if any, in an area. For the WGYC region, where 11% of the population is Hispanic/Latino, concentrations of this ethnicity (based on HUD's definition) occur where the proportion is 21% or more.

As shown below, areas of concentration occur in:

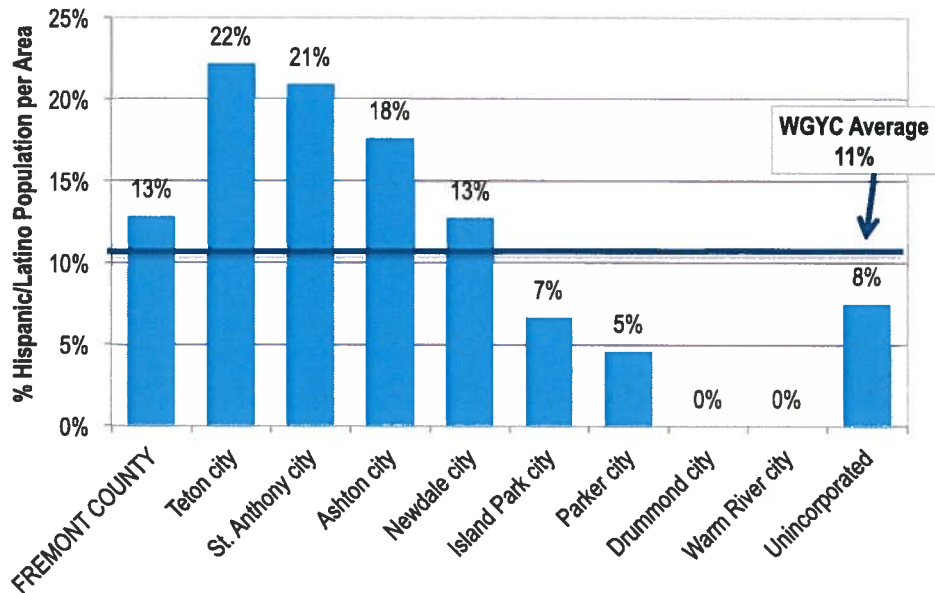
- Two communities in Fremont County – St. Anthony and Teton City;
- Two cities in Teton County, Idaho - Driggs and Victor; and
- The town of Jackson in Teton County, Wyoming.

Together, these areas of concentration represent 51% of the Hispanic/Latino population in the region. About 30% reside in the town of Jackson.

In all but Madison County, persons of Hispanic/Latino descent are more likely to be living in city, town and CDP areas than the unincorporated county. This is shown below, where a lower percentage of the population in unincorporated areas is Hispanic/Latino than in the county overall. This is the reverse of population trends in total. For example, in both Fremont County and Teton County, Idaho, only 28% of the Hispanic/Latino population lives in the unincorporated county compared to 56% of the population in total. One contributing factor is the lack of housing

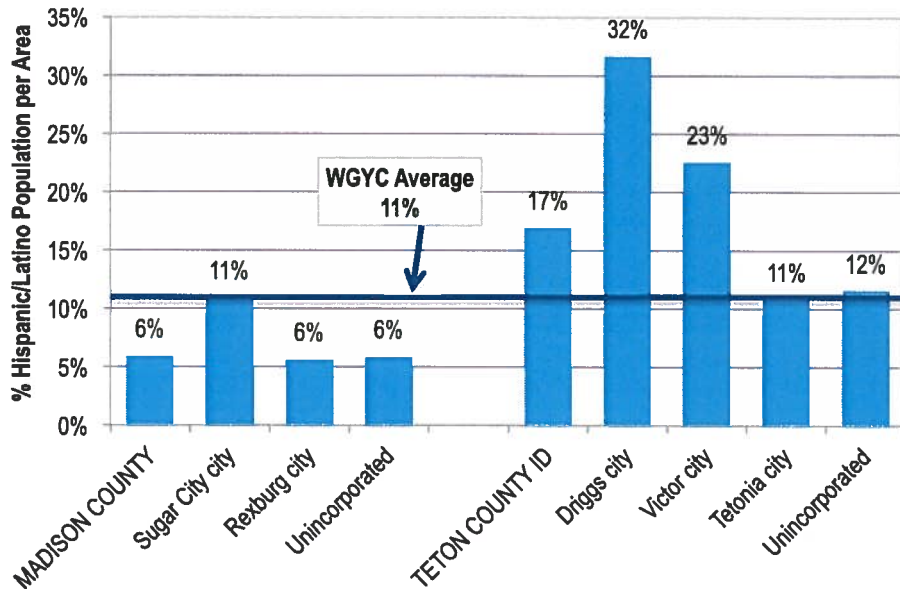
diversity in unincorporated and non-CDP areas, which are predominately large lot single-family homes.

**Percent Hispanic/Latino Descent by City/Town/CDP: 2010**  
**Fremont County**

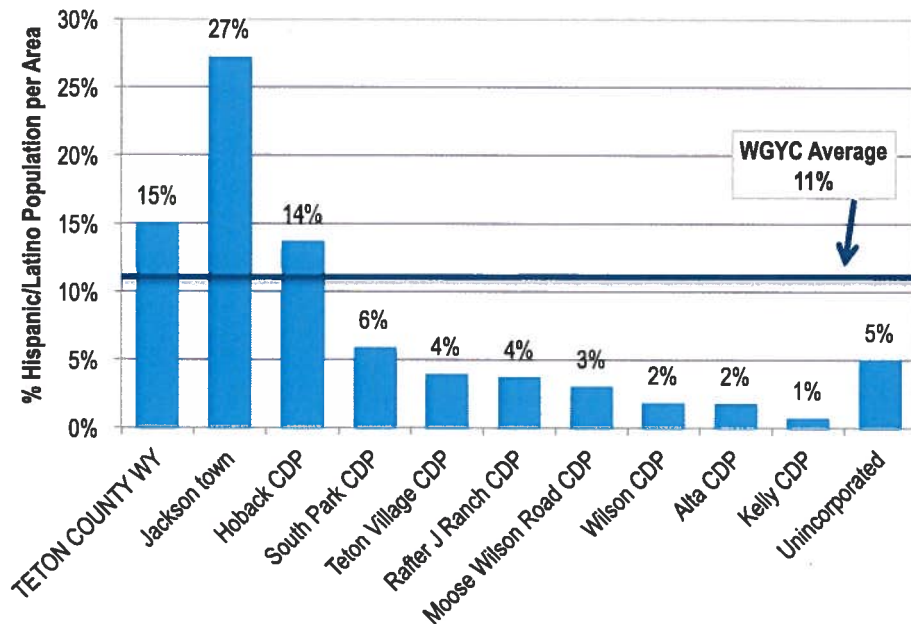


NOTE: Drummond and Warm River are very small; less than 20 persons combined.

### Madison and Teton Counties, Idaho



### Teton County, Wyoming



Source: 2010 US Census

## Gender

The Fair Housing Act prohibits discrimination in housing based on sex. The percentage of the population that is female in the WGYA dropped slightly in 2010 to 49%. All counties except Madison have a higher proportion of males than females. Mountain resort communities tend to attract more males. The outdoor recreation community in northern Fremont County and the older population also support higher male populations. BYI-I has a higher percentage of female than male students, supporting the larger female population in Madison.

	2000			2010		
	Male	Female	% Female	Male	Female	% Female
<b>WGYC Region</b>	32,064	31,472	50%	41,661	40,581	49%
<b>Fremont County, ID</b>	6,076	5,743	49%	6,963	6,279	47%
<b>Ashton</b>	542	587	52%	553	574	51%
<b>Island Park</b>	114	101	47%	153	133	47%
<b>St. Anthony</b>	1,732	1,610	48%	1,929	1,613	46%
<b>Madison County, ID</b>	13,077	14,390	52%	18,186	19,350	52%
<b>Rexburg</b>	7,795	9,462	55%	12,057	13,427	53%
<b>Teton County, ID</b>	3,178	2,821	47%	5,321	4,849	48%
<b>Driggs</b>	582	518	47%	854	806	49%
<b>Victor</b>	432	408	49%	1,011	917	48%
<b>Teton County, WY</b>	9,733	8,518	47%	11,191	10,103	47%
<b>Jackson</b>	4,671	3,976	46%	5,185	4,392	46%

Source: 2000 and 2010 US Census

## Disabilities (2000, 2010)

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided reasonable accommodation can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). Persons with disabilities are also at greater risk of experiencing housing discrimination, oftentimes due to a lack of knowledge about laws governing accommodations for the disabled.

The Census defines a disability as a long-lasting physical, mental or emotional condition that can make it difficult for a person to certain activities, such as walk,



climb stairs, dress, bathe, learn or remember. This condition can also impede a person from being able to go outside the home alone or to work.

It is estimated that between about 9% and 11% of persons in the WGYA have a disability – or between 6,600 and 8,200 persons.<sup>7</sup> Of persons age 65 and over, 42% have at least one disability.

**WGYC Region  
Persons With Disabilities by Type: 2010 (est)**

2000	2010 Population Age 5+	
	# (2010)	% (2000)
Persons age 5+	75,216	100%
With a disability	8,186	11%
With one type of disability:	5,007	7%
Sensory disability	1,107	1%
Physical disability	1,338	2%
Mental disability	1,059	1%
Self-care disability	21	0%
Go-outside-home disability	401	1%
Employment disability	1,081	1%
With two or more types of disability:	3,178	4%
<b>2008-2012</b>	<b># (2010)</b>	<b>% (ACS)</b>
Persons age 5+	75,216	100%
Persons with disability	6,735	9%

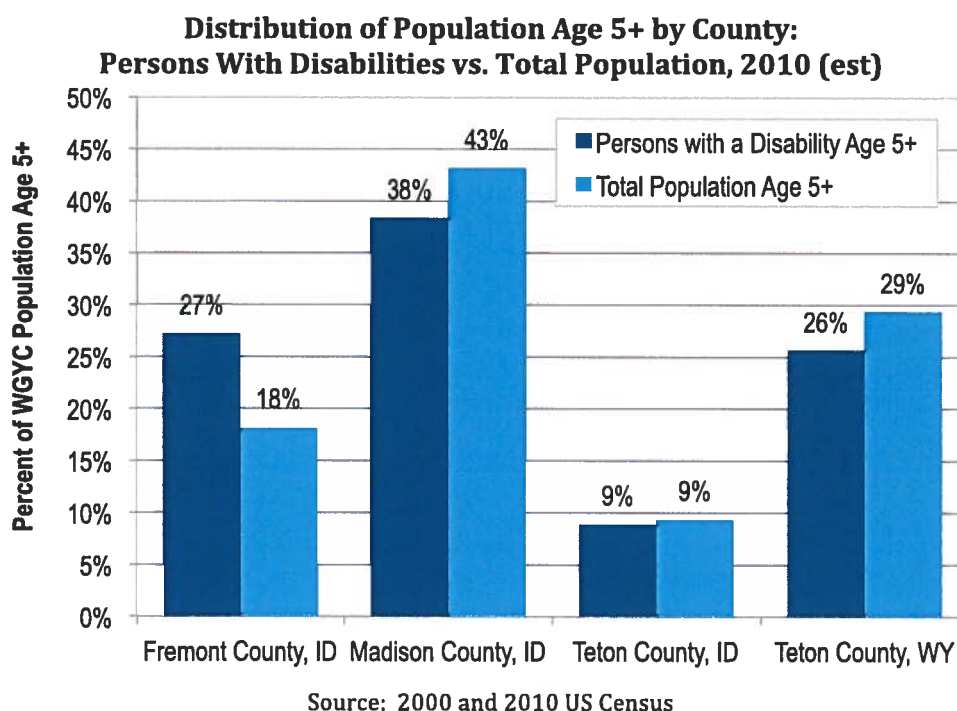
Sources: 2000 US Census; 2008-2012 ACS 5-year

The proportion of the population with disabilities living in each county was compared to the general distribution of the population overall to understand where higher concentrations of this population may reside.

- A greater percentage of persons with disabilities reside in Fremont County than the population as a whole. This is a factor of the higher senior population in this county compared to others in the region.
- Madison County, with the youngest population on average, has the lowest proportion of persons with disabilities compared to its share of the total population.

<sup>7</sup> The 2000 Census is the most recent complete data on persons with disabilities over age 5. The 2008-2012 ACS 5-year estimates are also available, though has a higher margin of error of up to 4% at the county level and up to 15% at the city/town/CDP level in the WGYA.





More specifically, in the WGYA:

- Fremont County has the highest percentage of persons with disabilities (16%). This county also has the highest percentage of seniors (14%).
- Rexburg, with the youngest population, has the lowest proportion of persons with disabilities (8%); and
- Only St. Anthony is an area of concentration for persons with disabilities, at 22%. The city has at least two (2) senior assisted living centers and 13 affordable rental units for seniors, which accounts for some of this concentration.

**Persons with Disabilities by County and City/Town: 2010 (est)**

	2010 Population age 5+	Persons age 5+ with disabilities	% with disabilities (2000)
<b>Fremont County, ID</b>	12,076	1,970	16%
<b>Ashton</b>	1,030	184	18%
<b>Island Park</b>	269	33	12%
<b>St. Anthony</b>	3,165	697	22%
<b>Madison County, ID</b>	33,942	3,280	10%
<b>Rexburg</b>	23,032	1,938	8%
<b>Teton County, ID</b>	9,187	950	10%
<b>Driggs</b>	1,499	202	13%
<b>Victor</b>	1,684	200	12%
<b>Teton County, WY</b>	20,011	1,900	9%
<b>Jackson</b>	8,953	1,083	12%

Source: 2000 and 2010 US Census; Consultant team

**Household Characteristics**

Households increased by 33% in the WGYA, slightly faster than the population (29%).

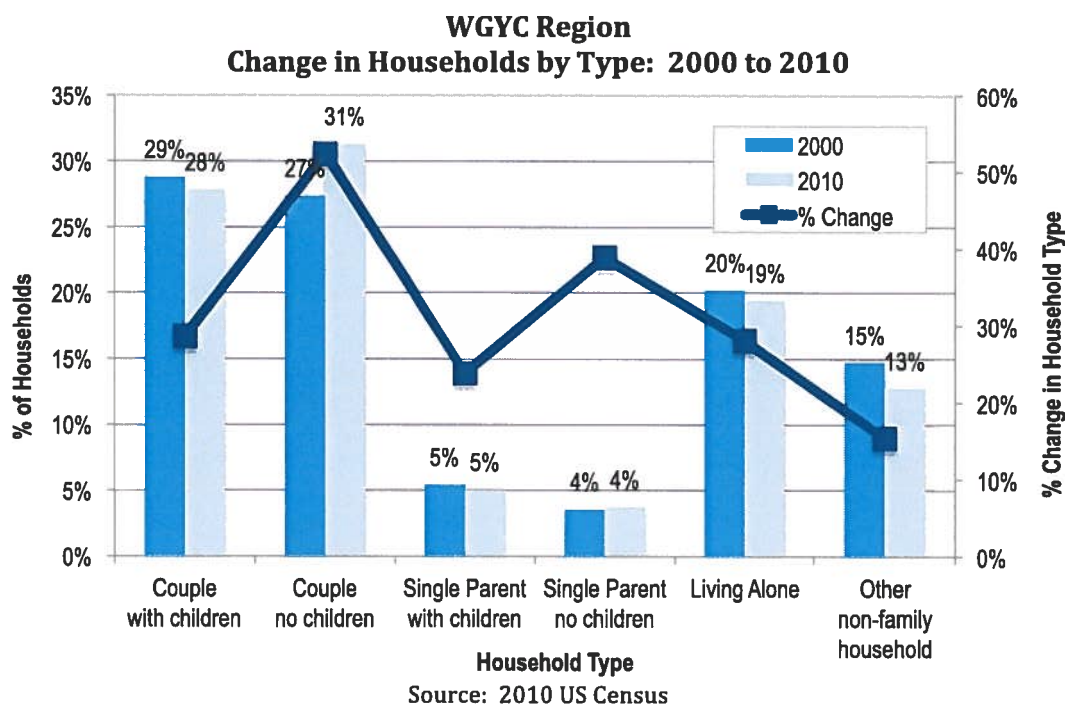
- Teton County, Idaho, showed the most growth, with the city of Victor more than doubling in size in the 2000's (133% increase).
- Madison County grew at the second fastest rate (49%), primarily driven by growth in Rexburg; and
- Fremont County and Teton County, Wyoming, grew at similar rates (14% and 17%, respectively). Only the town of Jackson and city of St. Anthony showed slower growth in households than the population.

**Total Households: 2000 and 2010**

	2000	2010	% Change 2000-10
<b>Region</b>	20,780	27,671	33%
<b>Fremont County</b>	3,885	4,436	14%
<b>Ashton</b>	395	397	1%
<b>Island Park</b>	90	122	36%
<b>St. Anthony</b>	1,091	1,118	2%
<b>Madison County</b>	7,129	10,611	49%
<b>Rexburg</b>	4,274	7,179	68%
<b>Teton County ID</b>	2,078	3,651	76%
<b>Driggs</b>	386	587	52%
<b>Victor</b>	293	683	133%
<b>Teton County WY</b>	7,688	8,973	17%
<b>Jackson</b>	3,631	3,964	9%

Source: 2000 and 2010 US Census

About two-thirds of households in the regions are family households, which include related persons living together. Households comprised of couples without children showed the largest percentage increase in the region between 2000 and 2010 (52%). These were the only households to increase as a percentage share of households in the region (from 27% in 2000 to 31% in 2010).



Regarding changes in specific areas of the region since 2000:

- Couples with children grew fastest in Victor and Rexburg, showed slow growth in Teton County, Wyoming, and Jackson, and had no growth in Fremont County overall;
- Single parents with children increased 24% in the WGYA, with the fastest growth in Teton County, Idaho (104%). Rexburg lost about 5% of their single parent households;
- Victor had the fastest growth in non-family households. These households comprise the highest percentage of households in Rexburg (22%) and Jackson (21%) than in other areas in the region;
- Persons living alone comprise the highest percentage of households of all household types in Island Park (34%), Jackson (32%) and Teton County, Wyoming (29%). At the other extreme is Rexburg, with only 9% of households consisting of only one person living alone; and
- In Ashton, only single parent and other non-family households (i.e., roommate households) increased between 2000 and 2010 – all other household types declined.

**Households by Type by County and City/Town: 2000 to 2010**

Type of Household	Married couple		Single parent		Non-family	
# 2010	With Children	No Children	With Children	No Children	Living Alone	Other
<b>Fremont County, ID</b>	1,304	1,621	295	216	876	124
<b>Ashton</b>	116	114	37	19	99	12
<b>Island Park</b>	18	50	4	2	41	7
<b>St. Anthony</b>	336	321	129	71	227	34
<b>Madison County, ID</b>	3,566	3,606	361	354	1,077	1,647
<b>Rexburg</b>	2,106	2,391	208	220	659	1,595
<b>Teton County, ID</b>	1,130	1,021	241	117	800	342
<b>Driggs</b>	167	130	60	28	132	70
<b>Victor</b>	232	135	43	23	164	86
<b>Teton County, WY</b>	1,693	2,409	494	342	2,621	1,414
<b>Jackson</b>	670	726	250	212	1,264	842
% 2010	Married couple		Single parent		Non-family	
	Children	None	Children	None	Alone	Other
<b>Fremont County, ID</b>	29%	37%	7%	5%	20%	3%
<b>Ashton</b>	29%	29%	9%	5%	25%	3%
<b>Island Park</b>	15%	41%	3%	2%	34%	6%
<b>St. Anthony</b>	30%	29%	12%	6%	20%	3%
<b>Madison County, ID</b>	34%	34%	3%	3%	10%	16%
<b>Rexburg</b>	29%	33%	3%	3%	9%	22%
<b>Teton County, ID</b>	31%	28%	7%	3%	22%	9%
<b>Driggs</b>	28%	22%	10%	5%	22%	12%
<b>Victor</b>	34%	20%	6%	3%	24%	13%
<b>Teton County, WY</b>	19%	27%	6%	4%	29%	16%
<b>Jackson</b>	17%	18%	6%	5%	32%	21%
% Change 2000-2010	Married couple		Single parent		Non-family	
	Children	None	Children	None	Alone	Other
<b>Fremont County, ID</b>	0%	21%	27%	36%	16%	24%
<b>Ashton</b>	-4%	-3%	28%	0%	-5%	140%
<b>Island Park</b>	20%	43%	-20%	-33%	64%	0%
<b>St. Anthony</b>	0%	1%	28%	11%	-6%	10%
<b>Madison County, ID</b>	47%	94%	3%	62%	19%	20%
<b>Rexburg</b>	94%	151%	-5%	58%	21%	19%
<b>Teton County, ID</b>	60%	86%	104%	26%	81%	101%
<b>Driggs</b>	42%	60%	107%	12%	47%	63%
<b>Victor</b>	144%	85%	105%	35%	152%	291%
<b>Teton County, WY</b>	10%	24%	17%	27%	25%	0%
<b>Jackson</b>	9%	15%	5%	17%	17%	-4%

Source: 2000 and 2010 US Census

Protection against discrimination in housing for families with children was added in the 1988 amendments to Title VIII of the Civil Rights Act. It is unlawful to refuse to rent or sell to families with children, except in limited circumstances, such as for elderly housing. Single parents are particularly susceptible to discrimination due to lower incomes, fewer housing options and the unwillingness of landlords to rent their units to families with children.

About 5% of households in the WGYA are single parent households with children; 28% are couples with children. There are no areas of concentrations for either single parent households or households with children in the WGYA, although there are some notable differences:

- St. Anthony has the highest percentage of single parents with children in the region (12%), followed by Tetonia (11%) and Driggs (10%);
- Madison County has the lowest percentage of single parent households with children (3%), but the second highest number of such households (about 360 total), next to Teton County, Wyoming (about 490 total); and
- Couples with children comprise the highest percentage of households in Teton County, Idaho, and each of its cities. Teton County, Wyoming, has the lowest percentage of couples with children (19%).

### **Income**

HUD publishes median family income figures for the counties in the WGYA each year. The MFI varies by household size, but HUD also provides the overall median (or middle) income for each area. Many federal housing programs, including low-income tax credit and USDA subsidized units, use HUD MFI's as the standard that households must meet to be able to income-qualify for units. For example, units affordable for extremely low-income households would be limited to households earning 30% or less of the MFI for the area.

The below table shows the variation in HUD MFI for each county in the WGYA. Family incomes are highest in Teton County, Wyoming, followed by Teton County, Idaho, and Fremont County. Incomes are lowest in Madison County.

**HUD Median Family Incomes by County: 2014**

Household size	30% MFI	50% MFI	80% MFI	100% MFI	120% MFI
<b>Fremont County, ID (2.9 persons per household on average)</b>					
1-person	\$11,200	\$18,600	\$29,750	\$37,200	\$44,640
2	\$12,800	\$21,250	\$34,000	\$42,500	\$51,000
3	\$14,400	\$23,900	\$38,250	\$47,800	\$57,360
4	\$15,950	\$26,550	\$42,500	\$53,100	\$63,720
<b>Madison County, ID (3.4 persons per household on average)</b>					
1-person	\$11,000	\$18,350	\$29,300	\$36,700	\$44,040
2	\$12,600	\$20,950	\$33,500	\$41,900	\$50,280
3	\$14,150	\$23,550	\$37,700	\$47,100	\$56,520
4	\$15,700	\$26,150	\$41,850	\$52,300	\$62,760
<b>Teton County, ID (2.8 persons per household on average)</b>					
1-person	\$12,500	\$20,800	\$33,250	\$41,600	\$49,920
2	\$14,250	\$23,800	\$38,000	\$47,600	\$57,120
3	\$16,050	\$26,750	\$42,750	\$53,500	\$64,200
4	\$17,800	\$29,700	\$47,500	\$59,400	\$71,280
<b>Teton County, WY (2.3 persons per household on average)</b>					
1-person	\$20,350	\$33,900	\$44,750	\$67,800	\$81,360
2	\$23,250	\$38,750	\$51,150	\$77,500	\$93,000
3	\$26,150	\$43,600	\$57,550	\$87,200	\$104,640
4	\$29,050	\$48,400	\$63,900	\$96,800	\$116,160

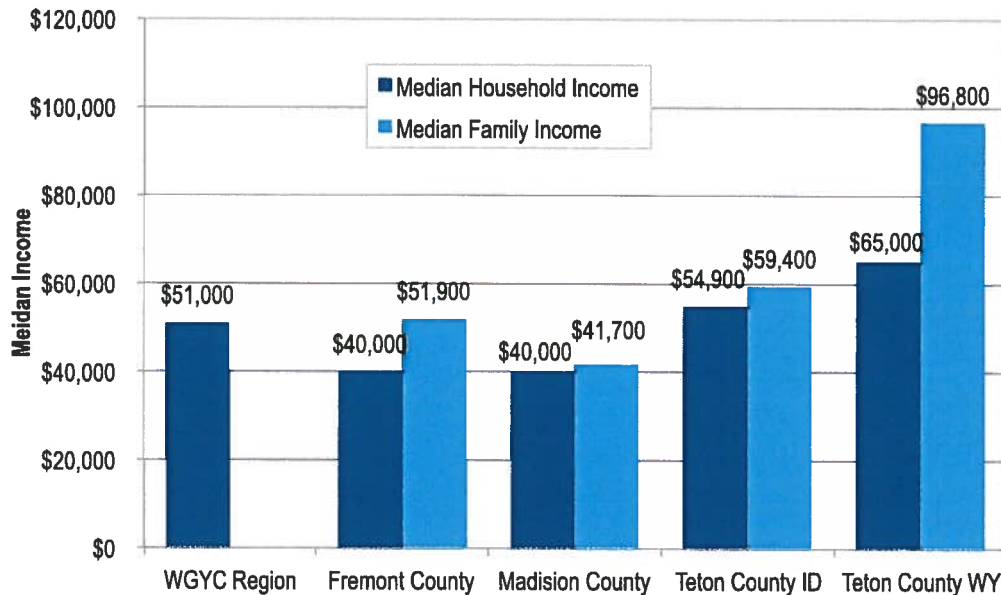
Source: HUD; 2010 Census (average household size)

The median family income (MFI) is typically higher than the income of all households in a county because non-family household incomes (single persons and roommate households) are not included in HUD's calculation. The below chart compares the MFI to median incomes of all households in each county. As shown:

- The median household income of households in the WGYA is \$51,000. This ranges from a high of \$65,000 in Teton County, Wyoming, to a low of \$40,000 in both Fremont and Madison Counties.
- Madison County shows the least variation in median household and family incomes. This is because non-family student households, which are not included in HUD's estimates, and student family households, which are included in HUD's estimates, have similarly low incomes; and
- Teton County, Wyoming, shows the largest difference between household and median family incomes. The county also has the highest percentage of non-family households of all counties in the region.



### Median Household and Family Incomes: 2014 Region and Counties



Sources: Household Income and 50% MFI Households, 2014 Housing Survey;  
Family Income, 2014 HUD (not available for the region)

### Very-Low-Income Households (50% MFI)

This section analyzes the concentration of households that earn 50% or less MFI in the region, rather than the typical measure of the federal poverty level.

A WGYA family of four earning under \$23,850 in 2014 falls within the federal poverty level, defined as the minimum amount of gross income that a family needs for food, clothing, transportation, shelter and other necessities. As illustrated by HUD's MFI figures, \$23,850 goes further in Fremont and Madison Counties than in Teton County, Wyoming, in terms of meeting family expenses. The federal poverty level equates to a 3-person family household earning 50% or less MFI in Fremont and Madison Counties; a 2-person family in Teton County, Idaho, earning less than 50% MFI; and a 2-person family earning less than 30% MFI in Teton County, Wyoming.

Although a 4-person family earning 50% MFI earns significantly more in Teton County, Wyoming, (\$48,400) than in Madison County (\$26,150), the comparative cost of living in the respective areas means that these households face similar challenges in meeting their household needs. As a result, HUD's MFI for very-low-



income households (i.e., earning 50% or less MFI) provides a more uniform measure of households struggling to meet expenses.

About 25% of households in the WGYA earn under 50% MFI.<sup>8</sup> Comparing concentrations by area, we find that:

- Households earning under 50% MFI range from a low of 15% of households in Victor to a high of 38% in Rexburg.
- Rexburg is the only notable area of concentration for very low-income households. Again, this is related to the student population, where 90% of these households have at least one adult student and are mostly couples without children and roommate households.
- Teton County, Idaho, has the lowest percentage of very low-income households of all counties. This is due in part to the fact that 53% of households (72% in Victor) have at least one worker that commutes to higher wage jobs in Teton County, Wyoming.

#### Very Low-Income Households by Area: 2014

	Households Earning 50% MFI or Less	Median Household Income
<b>WGYC Region</b>	25%	\$51,000
<b>Fremont County, ID</b>	27%	\$40,000
<b>Ashton</b>	29%	\$38,000
<b>Island Park region</b>	25%	\$50,000
<b>St. Anthony</b>	30%	\$40,000
<b>Madison County, ID</b>	32%	\$40,000
<b>Rexburg</b>	38%	\$34,000
<b>Teton County, ID</b>	16%	\$54,900
<b>Driggs</b>	20%	\$49,800
<b>Victor</b>	15%	\$60,000
<b>Teton County, WY</b>	22%	\$65,000
<b>Jackson</b>	26%	\$55,000

Source: 2014 Housing Survey

<sup>8</sup> This data is based on the 2014 Housing Survey rather than the ACS. The survey and 2008-2012 ACS reported similar figures for the counties and larger communities; but the ACS has up to a 20% margin of error for some of the smaller communities.

2008-2012 ACS 5-year data was used to understand the general relationship of incomes of households with persons in protected classes compared to the average household in each county. As shown below:

- Single-parent households with a female householder consistently earn the lowest median incomes in each county – at least 50% less than households in total;
- Households with a Hispanic/Latino householder are the second lowest income earners, with median incomes between about 20% and 30% less than households in total in the Idaho counties and near 80% less than total households in Teton County, Wyoming; and
- Senior-headed households have median incomes nearer to the overall median for each county.

**Income Comparison by Protected Class: 2008-2012 ACS**

	Fremont County Median Income	Madison County Median Income	Teton County ID Median Income	Teton County WY Median Income
<b>All Households</b>	\$43,053	\$33,776	\$56,532	\$69,020
<b>65+ Householder</b>	\$35,413	\$43,125	\$56,414	\$57,344
<b>Single Parent</b>				
<b>Female Householder</b>	\$28,214	\$22,069	\$37,583	\$35,577
<b>Male Householder</b>	\$33,750	\$42,813	\$40,372	\$93,071
<b>Hispanic/Latino</b>	\$33,288	\$28,000	\$41,029	\$38,235

Source: 2008-2012 ACS 5-year estimates

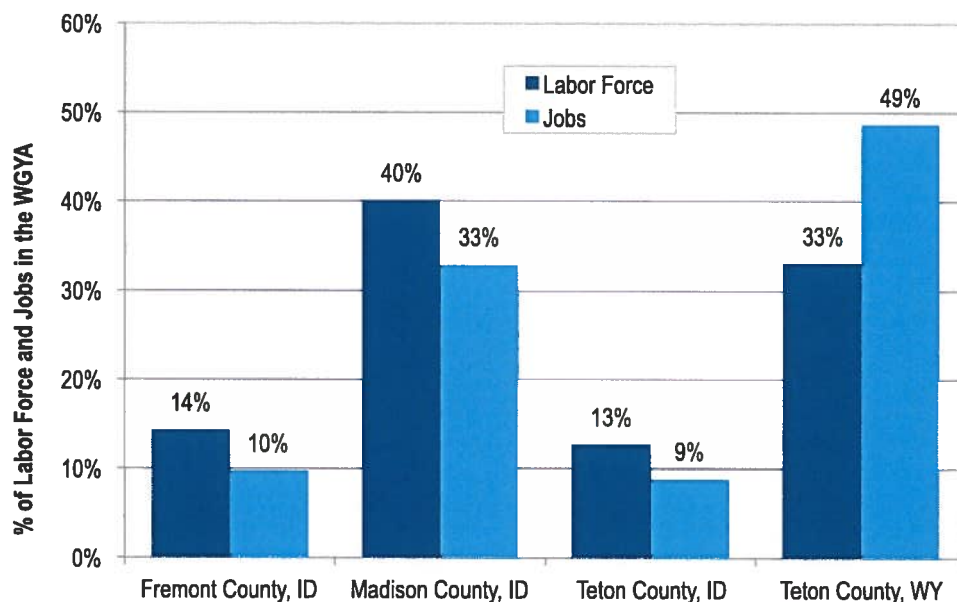
## EMPLOYMENT

### Job Growth

There are about 57,900 jobs in the WGYA. Almost one-half of these jobs are located in Teton County, Wyoming. Another third are in Madison County and Fremont and Teton Counties, Idaho, each have less than 10% of jobs in the region.

Only Teton County, Wyoming, has a lower percentage of the labor force living in the county than regional jobs, meaning the county relies on in-commuters to fill some jobs. Only Teton County, Idaho, has fewer jobs than persons in the local labor force – may of whom commute to Teton County, Wyoming for work, as further discussed below.

**Distribution of Jobs Vs. Local Labor Force by County: WGYA 2013**



Source: Bureau of Labor Statistics, LAUS data; Bureau of Economic Analysis (BEA) Jobs estimates; Consultant team

The number of jobs in all counties in the WGYA peaked in 2008 and reached their lowest point in 2010. About 4,000 jobs were lost during this period. Jobs have been growing at an average rate of 2.6% since 2010. As of 2013, the number of jobs in Fremont County and Teton County, Wyoming, has fully recovered. Despite this, the rate of growth in the WGYA is slower post-recession than pre-recession – jobs were growing at an average rate of 4.8% per year between 2005 and 2008.

**Jobs by County: WGYA, 2005 - 2013**

	REGION	Fremont County	Madison County	Teton County ID	Teton County WY
2005	50,395	4,892	17,312	3,765	24,426
2006	53,079	5,087	18,082	4,335	25,575
2007	56,417	5,300	19,051	5,126	26,940
2008	57,701	5,359	19,155	5,237	27,950
2009	54,493	5,309	17,908	4,628	26,648
2010	53,667	5,278	17,766	4,580	26,043
2011	54,759	5,350	18,273	4,753	26,383
2012	56,224	5,332	18,969	4,812	27,111
2013*	57,907	5,617	19,040	5,083	28,168
% change (2008-2013)	0%	5%	-1%	-3%	1%
% change (2010-13)	8%	6%	7%	11%	8%

Source: BEA; Quarterly Census of Employment and Wages (QCEW); Consultant team

Employment in the region is dominated by accommodation and food services (primarily led by jobs in Teton County, Wyoming), education and health services (led by jobs in Madison County), and government (which plays the largest role in Fremont County jobs, but is prominent in all counties). Dominant employment sectors vary by county, as has their economic evolution:

- **Fremont County:** In Fremont County, government (21%), farm employment (13%) and retail (9%) are the dominant sectors. Since 1970, agricultural and natural resource employment has been declining as a share of jobs in exchange for growth in construction and services and professional jobs. In 1970, farm employment constituted about 30% of jobs, dropping to 23% in 2000 and only 13% in 2013.<sup>9</sup> It should be noted that the Island Park area has been less affected by this shift given that the area is much more of a tourism and recreational based economy than southern Fremont County.
- **Madison County:** In Madison County, education and health (20%), government (11%) and retail (11%) are the dominant sectors. BYU-Idaho is the largest employer in the county. Compared to the state, this county has a significantly higher percentage of workers in educational and health services, as well as professional and business services and trade/utilities/transportation. Given its location among the recreational attractions in the WGYA, the area has surprisingly few jobs in leisure and hospitality industries (which include arts and recreation, accommodation and food services and real estate).<sup>10</sup>

<sup>9</sup> For more information see the Fremont County Comprehensive Plan 2009.

<sup>10</sup> See the Madison County "2020" Comprehensive Plan for more information.

- **Teton County, Idaho:** In Teton County, Idaho, government (13%), real estate (11%) and accommodation and food, farm employment and construction (all at 9%) are the largest employment sectors. This county's economy is tied in many ways to Teton County, Wyoming, through providing workers to fill jobs in Wyoming, increased real estate and construction activity due to demand for housing from these workers, and Grand Targhee Resort, a significant employer, which is located in Wyoming, yet only accessed through Teton County, Idaho. The transition of this county's economy to an outdoor recreation and tourism began in 1969 with the establishment of Grand Targhee Resort. Despite this, the county still retains a significant farm economy in the primarily northern and western parts of the county.<sup>11</sup>
- **Teton County, Wyoming:** In Teton County, Wyoming, dominant employment sectors include accommodation and food services (24%), real estate (10%), and government (9%). Tourism and real estate development has been the historic base of this county's economy, driven by visitors to Grand Teton National Park, Jackson Hole Mountain Resort, and Yellowstone National Park (of which 40% is within Teton County).

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<sup>11</sup> See the Teton County, Idaho, 2012-2030 Comprehensive Plan for more information.

**Jobs by Industry: WGYA and Counties, 2012**

	REGION	Fremont County	Madison County	Teton County ID	Teton County WY
<b>TOTAL 2012 jobs</b>	56,224	5,332	18,969	4,812	27,111
% of jobs in Region	100%	9%	34%	9%	48%
Farm employment	4%	13%	4%	9%	1%
Forestry, fishing, and related	0%	(ND)	(ND)	1%	(ND)
Mining	0%	(ND)	(ND)	1%	(ND)
Utilities	(ND)	(ND)	(ND)	(ND)	(ND)
Construction	7%	7%	4%	9%	8%
Manufacturing	2%	2%	4%	3%	1%
Wholesale trade	3%	(ND)	8%	2%	(ND)
Retail trade	9%	9%	11%	8%	8%
Transportation and warehousing	1%	5%	(ND)	(ND)	2%
Information	1%	(ND)	1%	2%	1%
Finance and insurance	5%	3%	3%	2%	7%
Real estate, rental and leasing	8%	6%	5%	11%	10%
Prof, scientific, and tech services	6%	(ND)	8%	(ND)	7%
Mgt of companies and enterprises	0%	(ND)	(ND)	(ND)	0%
Admin and waste mgt services	3%	2%	(ND)	7%	4%
Educational services	1%	0%	(ND)*	1%	1%
Health care and social assistance	3%	5%	(ND)*	3%	4%
Arts, entertainment, and recreation	4%	1%	2%	6%	5%
Accommodation and food services	15%	6%	5%	9%	24%
Other services	5%	7%	4%	5%	4%
Government	11%	21%	11%	13%	9%
<b>TOTAL % Disclosed</b>	87%	88%	71%	91%	98%

Source: BEA

\*Though not disclosed in BEA data, Education and Health services comprises about 20% of jobs in Madison County based on QCEW analysis presented by Idaho Dept. of Labor, Jan. 2014, workforce trends profiles. Incorporating this data, education and health services would comprise about 10% of jobs in the region as a whole.

**Wages**

The highest average wage in the WGYA is paid in Teton County, Wyoming (\$40,484). This area also has the highest housing costs. Each of the Idaho counties average about 25% less – between \$29,000 and \$30,000 – or about \$15 per hour.

**Average Wage: 2013**

	Fremont County	Madison County	Teton County ID	Teton County WY
Annual Wage	\$29,576	\$29,385	\$30,271	\$40,484
Hourly Wage*	\$14.79	\$14.69	\$15.14	\$20.24

Source: QCEW

\* Hourly wage is based on 2,000 hours of paid time

Wages vary significantly by industry:

- In all counties, except Teton County, Wyoming, about 40% of jobs pay less than the average annual wage.
- In Teton County, Wyoming, 58% of jobs pay under the average wage. This is also the only county in which government jobs pay less than the average wage. Management of companies and enterprises pay very high wages, but include only about 20 establishments, affecting few workers and skewing the average wage upward.
- Accommodation and food services pay the lowest average wages in all counties. In Teton County, Wyoming, where this sector constitutes 24% of jobs, wages average about \$25,700 per year, or just under \$13 per hour. A one-person household making this wage earns just over 30% MFI in the county.<sup>12</sup>
- In Madison County, education and health pays the highest wage (\$44,804) and constitutes the largest percentage of employment in the county (20%). This would place a 3-person household with one wage earner at near 100% MFI in the county.

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<sup>12</sup> HUD median family income (MFI) figures are provided in the Population and Household Demographics section of this report.



**Average Wage by Industry: 2013**  
(Sorted by amount of wage paid from lowest to highest)

**Fremont County**

	Average annual wage	Hourly equivalent wage	% of jobs
<b>Overall Average Wage</b>	<b>\$29,576</b>	<b>\$14.79</b>	<b>-</b>
Accommodation and food services	\$11,823	\$5.91	6%
Real estate and rental and leasing	\$17,942	\$8.97	6%
Arts, entertainment, and recreation	\$18,562	\$9.28	1%
Retail trade	\$20,879	\$10.44	9%
Health care and social assistance	\$23,856	\$11.93	5%
Agriculture, forestry and related (% farm est.)	\$24,927*	\$12.46	13%
Information	\$25,557	\$12.78	(ND)
Finance and insurance	\$26,962	\$13.48	3%
Other services, except public administration	\$30,154	\$15.08	7%
Administrative and waste management services	\$30,679	\$15.34	2%
Government and government enterprises	\$33,727	\$16.86	21%
Transportation and warehousing	\$36,058	\$18.03	5%
Construction	\$37,716	\$18.86	7%
Manufacturing	\$38,047	\$19.02	2%
Educational services	(ND)	(ND)	0%

Source: QCEW (wages), BEA (% employment), Idaho Department of Labor County profiles  
Mining, Utilities, Wholesale, Prof/Tech and Mgt of Companies excluded – information not disclosed.

\*Agriculture wage from Id. Dept. of Labor County profile, Jan. 2014



**Madison County**

	Average annual wage	Hourly equivalent wage	% of jobs
<b>Overall Average Wage</b>	<b>\$29,385</b>	<b>\$14.69</b>	<b>-</b>
Accommodation and food services	\$10,535	\$5.27	5%
Arts, entertainment, and recreation	\$11,257	\$5.63	2%
Real estate and rental and leasing	\$19,235	\$9.62	5%
Management of companies and enterprises	\$19,256	\$9.63	(ND)
Administrative and waste management services	\$19,455	\$9.73	(ND)
Other services, except public administration	\$19,880	\$9.94	4%
Retail trade	\$21,606	\$10.80	11%
Wholesale trade	\$22,774	\$11.39	8%
Information	\$22,986	\$11.49	1%
Construction	\$27,443	\$13.72	4%
Agriculture, forestry and related	\$27,524*	\$13.76	(ND)
Government and government enterprises	\$31,039	\$15.52	11%
Manufacturing	\$31,903	\$15.95	4%
Professional, scientific, and technical services	\$32,649	\$16.32	8%
Finance and insurance	\$35,990	\$18.00	3%
Educational services	(ND)**	(ND)	(ND)
Health care and social assistance	(ND)**	(ND)	(ND)

Source: QCEW (wages), BEA (% employment), Idaho Department of Labor County profiles

Mining, Utilities, and Transportation/Warehousing excluded above due to non-disclosure of information.

\*Agriculture wage from Id. Dept. of Labor County profile, Jan. 2014

\*\*Though not disclosed in publically available QCEW data, Education and Health services paid an average wage of \$44,804 in Madison County based on QCEW analysis presented by Idaho Dept. of Labor, Jan. 2014, workforce trends profiles – highest paying sector!

### Teton County, Idaho

	Average annual wage	Hourly equivalent wage	% of jobs
<b>Overall Average Wage</b>	<b>\$30,271</b>	<b>\$15.14</b>	<b>-</b>
Accommodation and food services	\$13,784	\$6.89	9%
Agriculture, forestry and related	\$20,923	\$10.46	1%
Retail trade	\$21,415	\$10.71	8%
Real estate and rental and leasing	\$23,608	\$11.80	11%
Educational services	\$23,944	\$11.97	1%
Manufacturing	\$27,085	\$13.54	3%
Arts, entertainment, and recreation	\$30,197	\$15.10	6%
Other services, except public administration	\$32,676	\$16.34	5%
Government and government enterprises	\$33,433	\$16.72	13%
Construction	\$34,993	\$17.50	9%
Finance and insurance	\$35,873	\$17.94	2%
Health care and social assistance	\$37,145	\$18.57	3%
Transportation and warehousing	\$38,408	\$19.20	(ND)
Information	\$41,232	\$20.62	2%
Administrative and waste management services	\$41,863	\$20.93	7%
Mining	(ND)	(ND)	1%
Wholesale trade	(ND)	(ND)	2%

Source: QCEW (wages), BEA (% employment), Idaho Department of Labor County profiles  
Utilities, Prof/Tech and Mgt of Companies excluded above due to non-disclosure of information.

### Teton County, Wyoming

	Average annual wage	Hourly equivalent wage	% of jobs
<b>Overall Average Wage</b>	<b>\$40,484</b>	<b>\$20.24</b>	<b>-</b>
Accommodation and food services	\$25,772	\$12.89	24%
Arts, entertainment, and recreation	\$28,750	\$14.38	5%
Retail trade	\$30,417	\$15.21	8%
Educational services	\$32,056	\$16.03	1%
Administrative and waste management services	\$36,212	\$18.11	4%
Manufacturing	\$36,804	\$18.40	1%
Other services, except public administration	\$36,820	\$18.41	4%
Transportation and warehousing	\$37,188	\$18.59	2%
Government and government enterprises	\$39,475	\$19.74	9%
Construction	\$45,409	\$22.70	8%
Health care and social assistance	\$49,482	\$24.74	4%
Real estate and rental and leasing	\$54,106	\$27.05	10%
Information	\$57,186	\$28.59	1%
Professional, scientific, and technical services	\$77,831	\$38.92	7%
Finance and insurance	\$87,598	\$43.80	7%
Management of companies and enterprises	\$556,809	\$278.40	0%

Source: QCEW (wages), BEA (% employment)  
Agriculture, mining, utilities and wholesale excluded above due to non-disclosure of information.

The 2014 Housing Survey asked the primarily Spanish-speaking respondents what type of jobs they held to better understand their employment opportunities in the region. As economies in the region have diversified from predominately agricultural jobs, this has permitted many previously seasonal workers to move to the area on a year-round basis.<sup>13</sup> The survey was conducted in the summer so reflects the job mix of respondents during summer seasonal months, when, for example, agricultural jobs in Idaho and tourism related jobs in Teton County, Wyoming, are near their peak.

As shown below, the largest percentage of Spanish survey respondents are employed in construction and landscaping jobs (36%) and service sector jobs, including janitorial/housekeeping (29%), food service (24%) and lodging (21%). Agricultural jobs constitute 19% of jobs held. This varies by county:

- Workers in Fremont County held primarily agricultural jobs (62%). Construction and landscaping is also a significant sector of employment (38%).
- Madison County jobs were also primarily agricultural (77%), with construction/landscaping (19%) and food service/restaurant (11%) distant seconds;
- Workers in both Teton County, Idaho, and Teton County, Wyoming, held tourism- and resort-based jobs: construction and landscaping, housekeeping/janitorial, food service/restaurant and lodging. Only 2% of workers in Teton County, Idaho, held an agricultural job.

#### Type of Jobs Held: Spanish Survey Respondents, 2014

	WGYA	Fremont County	Madison County	Teton County ID	Teton County WY
Construction/Landscaping	36%	38%	19%	42%	36%
Housekeeping/Janitorial	29%	8%	4%	30%	41%
Food service/Restaurant	24%	7%	11%	25%	32%
Lodging	21%	2%	8%	21%	31%
Agricultural	19%	62%	77%	2%	-
Ski area/Recreation	1%	-	-	3%	-
*TOTAL %	130%	116%	119%	123%	140%

Source: 2014 Housing Survey, Spanish survey respondents

\*Percentages add to over 100% due to multiple job holding

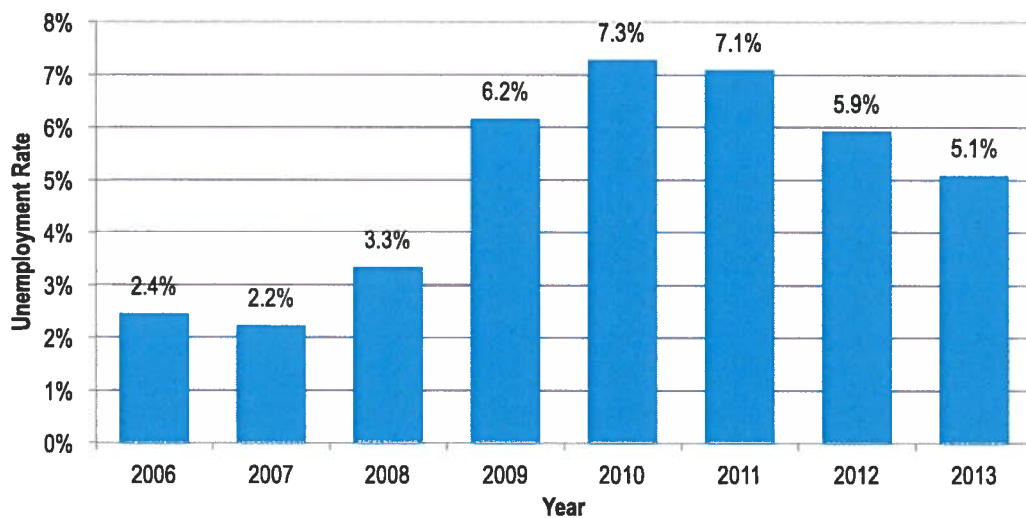
<sup>13</sup> This trend was noted in particular in the 2009 Fremont County Comprehensive Plan, but has been occurring throughout Idaho and the region.

## Unemployment

Unemployment in the WGYA was at its lowest rate in 2007. Unemployment peaked in 2010 at 7.3% and has since dropped to 5.1% – but is still more than double the rate in 2007. This equates to about 2,200 unemployed residents at the end of 2013. Trends are similar across all counties, although unemployment rates differ:

- Each county reached its lowest unemployment rate in 2007 – varying from 3.2% in Fremont County down to 1.7% in Teton County, Idaho;
- Each county also reached peak unemployment in 2010 – ranging between 9.1% in Fremont County and 5.1% in Madison County;
- 2013 unemployment rates are highest in Fremont County and lowest in Madison County. Madison County, however, has the highest number of unemployed persons (800 total) in the region.

**WGYA Unemployment Rate: 2006 – 2013**



Source: BLS, LAUS data

**Unemployment Rates by County: 2006 – 2013**

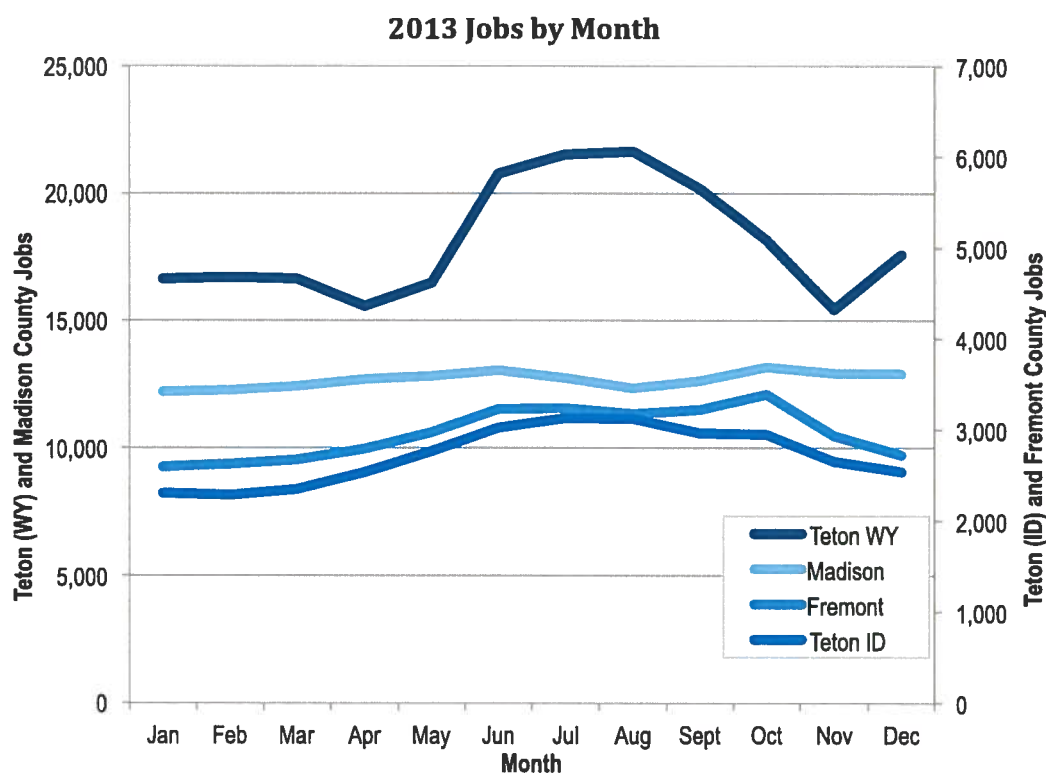
	Fremont County	Madison County	Teton County ID	Teton County WY
<b>2006</b>	3.2%	2.3%	1.7%	2.5%
<b>2007</b>	3.2%	2.1%	1.6%	2.2%
<b>2008</b>	4.7%	3.3%	2.7%	3.0%
<b>2009</b>	7.6%	5.1%	5.9%	6.9%
<b>2010</b>	9.1%	5.8%	7.2%	8.3%
<b>2011</b>	7.9%	6.4%	6.6%	7.8%
<b>2012</b>	6.7%	5.1%	6.0%	6.6%
<b>2013</b>	5.9%	4.6%	5.0%	5.3%

Source: BLS, LAUS data

**Seasonality in employment**

- Teton County, Wyoming, has the greatest seasonal change in jobs – with about 6,000 more jobs in the summer months than during the low-employment months of April and November. Summer jobs increase in construction and tourism-related positions, including retail, accommodation/food service, arts/entertainment and recreation, federal government/national parks; and administrative/waste services, which includes janitorial, landscaping, security systems and travel planning.
- Madison County shows very little change in jobs throughout the year. Unlike the other Idaho counties in the WGYA, Madison County only adds about 7% more jobs in June from its low employment month of January – Fremont and Teton counties add almost one-third more jobs in the summer. The decline in jobs in August coincides with the change-over in students and semesters at BYU-I.<sup>14</sup>
- Fremont and Teton Counties, Idaho, show a combined 30% boost in the summer months, mostly from farming, construction, accommodations/food, federal government and retail. Teton County, Idaho, also shows an increase in arts/entertainment jobs and accommodations/food service. Combined, both counties add close to 1,500 jobs to the region in the summer. Fremont County jobs actually peak in October, when it has 800 more jobs compared to its low employment month in January.

<sup>14</sup> Spring semester ends June 30<sup>th</sup> and Fall semester does not begin until mid-September. See <http://www.byui.edu/student-records/academic-deadlines> for more information on course scheduling.



## Commuting

As noted earlier, Teton County, Idaho, supplies workers to Teton County, Wyoming, to help fill jobs. Fremont County also supplies workers to Madison County. There is little cross-commuting among the other counties. More specifically:

- Over 50% of employed households in Teton County, Idaho, have at least one person employed in Teton County, Wyoming. In contrast, 97% of households in Teton County, Wyoming, work locally, with only 6% with a worker that travels to Idaho for employment. Jobs in Teton County, Wyoming, have been growing faster than the local labor force in recent years, increasing the need for out-of-county residents to fill jobs.
- Over one-third of employed households in Fremont County have at least one person that travels to Madison County for work. Only 9% of households in Madison County have at least one person employed in Fremont County.
- Teton County, Idaho, has the lowest incidence of employed households that work locally (70%) compared to the other counties (between 82% and 97%).



- About 10% of employed households in the WGYA have persons that work outside the region. This ranges from 15% of employed households in Fremont and Madison Counties down to 5% residing in Teton County, Wyoming.

#### Where County Residents Work: 2014

Where Work	REGION	Where Workers Live:			
		Fremont County	Madison County	Teton County ID	Teton County WY
Teton County WY	45%	2%	0%	53%	97%
Madison County	37%	37%	95%	2%	-
Fremont County	15%	82%	9%	2%	1%
Teton County ID	14%	4%	1%	70%	5%
Other County	10%	15%	15%	7%	5%
TOTAL	120%	139%	121%	132%	107%

Source: 2014 Housing Survey

\*Percentages add to over 100% due to multiple job holding/multiple workers per household

Regarding their method of travel:

- The majority of commuters travel by car (84%).
- Bike/walk is the second most common mode of transportation (12%) – with local workers residing in Teton County, Wyoming, and Madison County, most likely to use this method compared to other WGYA counties.
- Very few either take a bus or carpool (2% each). Only 4% carpool over the pass from Teton County, Idaho, to Teton County, Wyoming.
- Bus usage varied little by community. Even in Teton County, Wyoming, which has the most extensive bus service, only 3% of commuters used this mode of travel. Almost no household in Madison County uses bus service, but then the county also has no fixed public transportation routes. This is discussed further in the Policies and Resources section of this report.

#### Method of Commuting: WGYA, 2014

	REGION	Where Workers Live:			
		Fremont County	Madison County	Teton County ID	Teton County WY
Car	84%	95%	81%	89%	79%
Bike/Walk	12%	1%	18%	5%	16%
Carpool/Vanpool	2%	3%	1%	4%	2%
Bus	2%	1%	0%	1%	3%
TOTAL	100%	100%	100%	100%	100%

Source: 2014 Housing Survey



Commuting to another county for work can significantly increase monthly household costs. The below table presents the average miles traveled, one-way, by workers in households that have at least one member commuting to another county for a job. This shows that households that move to areas with more affordable rents and home purchase prices can quickly make up that difference when they then have to commute for work.

On average, commuting households in the WGYA increase their monthly housing payment by 78% each month to cover the cost of getting to their job. This can adversely affect lower income households in particular. When other costs are added, such as longer day care hours due to time spent commuting, household expenses quickly add up. Beyond providing transportation options for these households, this also illustrates the importance of providing affordable housing for these households near their place of work.

**Cost of Commuting: WGYA and Counties, 2014**

	WGYA	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>Average One-Way Commute per Household (miles)</b>	34.362 3666	27.6	30.9	43.6	17.9
<b>Monthly Commute Cost (\$0.56 per mile)</b>	\$802	\$645	\$722	\$1,017	\$417
<b>Average rent/mortgage payment</b>	\$1,029	\$636	\$792	\$1,006	\$1,398
<b>Increase in payment</b>	78%	101%	91%	101%	30%

Source: 2014 Housing Survey

## HOUSING PROFILE

The WGYA had about 39,000 housing units at the end of 2013. The comparative rural and resort nature of this area is apparent when comparing occupancy rates and housing unit locations by county and city or town in the region. As shown below:

- Over one-half of the housing units are in the unincorporated county in all counties, except Madison County. The majority of homes in Madison County are located in Rexburg (69%). Homes in the unincorporated areas are dominated by single-family homes, many on large lots or agricultural parcels.
- About 73% of WGYA housing units are occupied. About 72% of the 10,500 vacant units are vacant for seasonal or recreational use (i.e., used as second homes), meaning they are not available for occupancy by local households.
- Occupancy rates vary from a low of 18% in Island Park to a high of 94% in Rexburg and Madison Counties. Vacant units due to second homes tend to be higher in tourism-driven resort areas than those with more economic diversity and year-round economies. The town of Jackson, however, has an occupancy rate of 84%, which is relatively high for mountain resort communities with an active tourism base.

### Housing Units: 2013

	Total Housing Units (2013)	% in Unincorporated County (2010)	% Occupied (2010)
<b>WGYC Region</b>	39,332	54%	73%
<b>Fremont County, ID</b>	8,718	66%	52%
<b>Ashton</b>	452	-	88%
<b>Island Park</b>	697	-	18%
<b>St. Anthony</b>	1,265	-	89%
<b>Madison County, ID</b>	11,805	27%	94%
<b>Rexburg</b>	8,088	-	94%
<b>Teton County, ID</b>	5,536	66%	67%
<b>Driggs</b>	875	-	67%
<b>Victor</b>	857	-	80%
<b>Teton County, WY</b>	13,273	63%	70%
<b>Jackson</b>	4,955	-	84%

Source: 2000 and 2010 US Census; Census Building Permits survey

## Age of Housing

Evaluating housing units by their year of construction shows when development has been active in an area and can provide an indication of the condition of the housing stock. Older homes may be in need of substantial repairs.

- Fremont County has the oldest housing stock, with almost one-third of units having been built prior to 1970. This county has also had the least development activity after 1990 in the region.
- Development in Madison County picked up significantly in the 2000's, largely fueled by BYU-Idaho. Over 85% of the development in the county since 2000 has been in Rexburg.
- Teton County, Idaho, has the newest housing stock in the region. Over 50% of homes have been built since 2000. There are over 7,000 undeveloped platted lots in unincorporated Teton County and 1,600 in Victor and Driggs combined.
- Development in Teton County, Wyoming, was strongest in the 1980's and 1990's, when about 44% of homes were built. Activity declined in the 2000's, impacted in part by increased development regulation and decreased availability of developable land.
- Since March 2010, 1,230 units have been added in the region – predominately in Madison County (43%) and Teton County, Wyoming (37%).

### Housing Units by Year Built: 2013

	WGYC Region	Fremont County, Idaho	Madison County, Idaho	Teton County, Idaho	Teton County, Wyoming
<b>TOTAL Units (2013)</b>	39,332	8,718	11,805	5,536	13,273
<b>April 2010 or later</b>	3%	2%	4%	1%	3%
<b>April 2000 to March 2010</b>	27%	19%	31%	51%	19%
<b>1990 to March 2000</b>	19%	15%	14%	22%	24%
<b>1980 to 1989</b>	13%	11%	10%	6%	20%
<b>1970 to 1979</b>	19%	21%	23%	7%	18%
<b>1960 to 1969</b>	6%	9%	6%	2%	6%
<b>Before 1960</b>	13%	23%	11%	11%	8%

Source: 2000 and 2010 US Census; Census Building Permits survey

## Type of Homes Occupied

The availability of homes for various housing needs is affected by the diversity of housing types in a community.

- Teton County, Wyoming, has among the most diversity of housing types available. This county also has the largest inventory of affordable housing units for residents, as discussed later in this section;
- Madison County also offers a good mix of single family and multi-family units for households, with significant growth in multi-family homes in the 2000's. Over 50% of households occupied single family homes in 2000, compared to only 43% today. As described in more detail below, many of the multi-family units may not be available for all members of the community;
- Fremont County is dominated by single-family homes (76%). This county does, however, have the largest inventory of mobile homes, which can provide more affordable options for residents, depending upon their age and condition; and
- Teton County, Idaho, is also dominated by single-family homes (73%). Many of the multi-family units have been developed since 2000, indicating recent activity in diversifying the housing stock.

**Occupied Housing Units by Type: 2013**

	REGION	Fremont	Madison	Teton ID	Teton WY
<b>Single family</b>	54%	76%	43%	73%	44%
<b>Multi-family</b>	35%	7%	50%	15%	46%
<b>Mobile homes</b>	6%	14%	4%	9%	3%
<b>Other</b>	5%	3%	3%	4%	8%
<b>TOTAL (2013)</b>	28,623	4,533	11,105	3,690	9,295

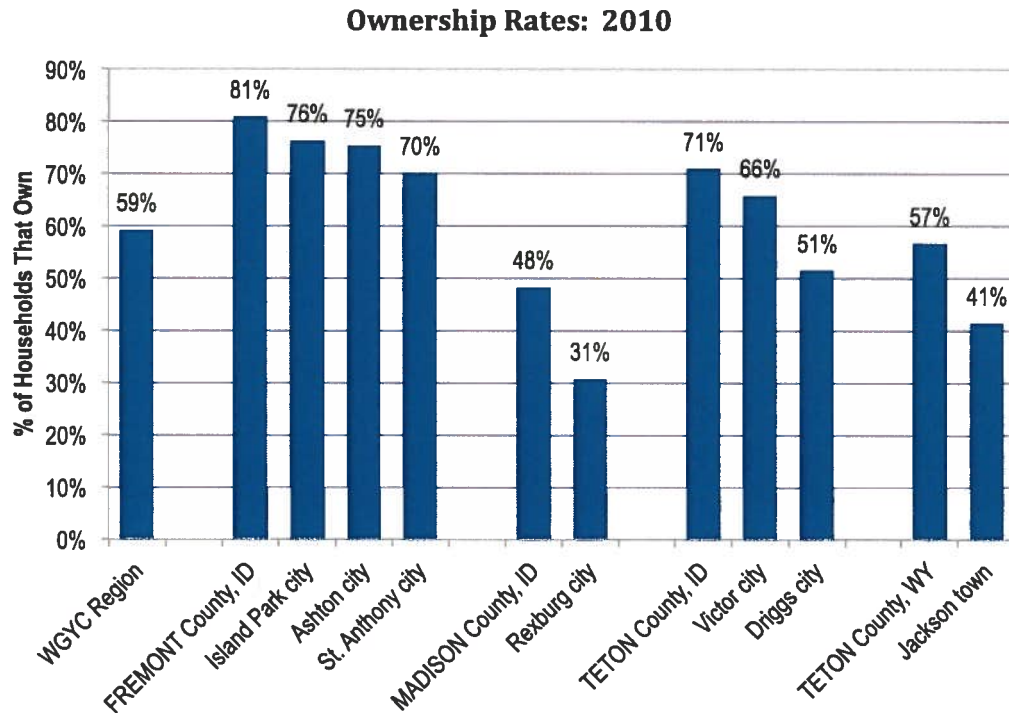
Source: 2014 Housing Survey

## Ownership Rates

The homeownership rate in the WGYA falls below state averages, but shows significant variation by county and city/town.

- About 59% of households in the WGYA own their homes, which is low compared to the state of Idaho and Wyoming (71% each). These rates, however, range from a high of 81% in Fremont County to a low of 48% in Madison County. The ownership rate in Madison County dropped 11 percentage points between 2000 and 2010.

- The city of Rexburg (31% own) and the town of Jackson (41% own) have the lowest ownership rates of all communities in the region. The low ownership rate in Rexburg is a factor of the high student population. The low ownership rate among residents in Jackson, however, is related to the high cost of housing compared to incomes. Many households who work in Jackson and that want to buy homes venture into neighboring counties, including Teton County, Idaho, where homes are priced lower.



Source: 2010 US Census

Ownership among certain protected populations is lower than overall averages.

- Households with a Hispanic/Latino householder average about 39% ownership in the region. About 68% own homes in Fremont County, many of which are mobile homes. This drops significantly to 18% in Teton County, Wyoming.
- Single parent households average about 52% ownership in the region. The highest ownership rate is again in Fremont County and the lowest is in Teton County, Wyoming; although the difference is not as drastic as for Hispanic/Latino households.

**Ownership Rate for Households of Protected Classes: 2010**

	WGYC Region	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>Hispanic/Latino Householder</b>	39%	68%	39%	54%	18%
<b>Single Parent Household (with or without children)</b>	52%	59%	50%	54%	48%

Source: 2010 Census

**Affordable Housing Inventory**

There are about 2,112 price or deed-restricted ownership or rental housing units in the WGYA, totaling about 8% of occupied units in the area. These include:

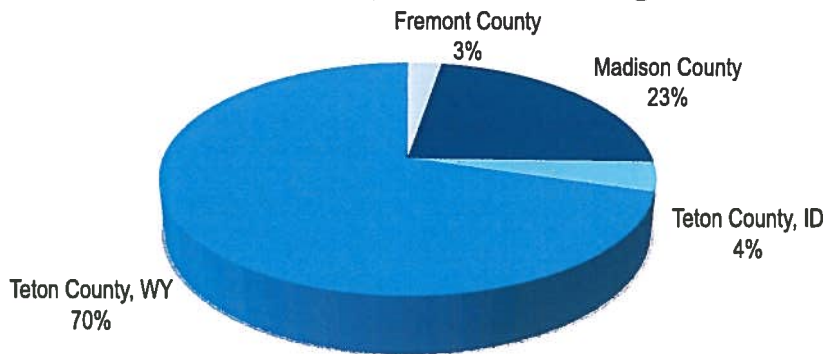
- Units subsidized under federal housing programs, such as LIHTC, RD, HOME and Section 8;
- Homes developed by local non-profit organizations, such as Habitat for Humanity and the Jackson Hole Community Housing Trust (JHCHT);
- Employment and income restrictions placed on units by the Teton County Housing Authority (TCHA);
- Units provided by major employers for their employees; and
- Units with employment requirements imposed by the Town of Jackson or Teton County on units developed as the result of county and town regulations or incentives.

A detailed inventory of these units by unit type and price point is provided in the 2014 WGYA Housing Needs Assessment.

The majority and greatest variety of these units are located in Teton County, Wyoming – the county with the highest housing costs in the WGYA and the one with the most housing programs in place. Madison County, which has the largest population, is a distant second, and solely offers affordable apartments.



### Distribution of Affordable/Restricted Housing Units: 2014



Source: Property manager interviews; HUD LIHTC database; County and non-profit interviews; Consultant team

- Of the affordable housing inventory in the WGYA, just under 40% (800 total) are restricted-income rentals produced with financing through federal programs, including LIHTC, RD, USDA and Section 8. Over 60% of these rentals are affordable to households earning very low incomes (50% MFI) or below. The rest are affordable for households earning under 80% MFI. Only 2% of these units were vacant as of August 2014 and most properties have a waitlist.
- Of other affordable rentals provided, about 60% do not have income restrictions for entry, but are instead tied to employment requirements. This includes units provided by Grand Teton National Park for their employees, for example. The inventory of these units is not complete as there are many smaller employers that provide assistance that are not captured in the below inventory.
- Teton County, Wyoming, is the only county with active homeownership programs. These homes range in affordability for households earning under 50% MFI (Habitat for Humanity homes) through greater than 120% MFI. In a county where the median list price of market-rate housing was nearly \$2.1 million in July 2014, these programs provide much needed ownership housing for residents.
- Habitat for Humanity, which provides affordable homes for ownership, started serving residents in the Fremont County area in 2012. They have renovated one home and are developing a second in the city of Ashton and are working on expanding their program to Madison and Teton Counties in Idaho (please see the "Policies and Resources" section of this RAI for more information).



**Affordable/Restricted Housing Inventory: 2014**

	WGYC	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>TOTAL</b>	2,112	56	480	88	1,488
<b>Rentals: LIHTC, RD, Sec 8</b>	800	54	480	88	178
<b>Rentals: Other</b>	787	0	0	0	787
<b>Ownership</b>	525	2	0	0	523

Source: Property manager interviews; HUD LIHTC database;  
County and non-profit interviews; Consultant team

- Most of the affordable rental units in Madison County are located in close proximity to BYU-I, southwest of campus. The grouped location has been primarily market-driven – comparatively cheap and available land was located in that area of town.

**Affordable Senior Rentals**

Included in the above inventory are 261 affordable rentals for seniors. These projects are a combination of LIHTC, RD and Section 8. Only two (2) units were vacant as of interviews conducted in August 2014 and most projects had a waitlist.

**Affordable Senior Rentals (LIHTC, RD, Section 8): 2014**

	WGYC	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>TOTAL Units</b>	261	22	111	50	78
<b># Projects</b>	8	2	3	2	1

Source: Property manager interviews; HUD LIHTC database

**Hispanic/Latino Occupancy**

In the WGYA, about 13% of affordable LIHTC/RD/Section 8 rentals are occupied by persons of Hispanic/Latino descent, as estimated from interviews with property managers (NOTE: not all properties reported this information). This varied by county, from a low of 4% of units in Fremont County to a high of about 35% in Teton County, Idaho. This shows that:

- Low-income rental housing is a significant source of housing for Hispanic/Latino households in Teton County, Idaho.
- Units in both Teton County, Idaho, and Madison County house a higher percentage of Hispanic/Latino households than reside in the county in total.

**Occupancy by Hispanic/Latino Households (LIHTC, RD, Section 8): 2014**

	WGYC	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>% Occupied</b>	13%	4%	11%	35%	7%

Source: August 2014 property manager interviews; consultant team

***Persons With Disabilities***

All LIHTC, RD, and Section 8 rental projects in the WGYA, except one in Fremont County, had fully accessible and/or adaptable units to accommodate persons with disabilities.

- About 9% of units (70 total) are accessible and 44% (370 total) are adaptable.
- Of those units, about 15% (65 to 70 total) were occupied by persons with disabilities. In other words, these properties have additional capacity to meet the housing needs of persons with disabilities as units become available.

***Section 8 Vouchers***

The Idaho Housing and Finance Agency (IHFA) administers the U.S. Department of Housing and Urban Development's (HUD) Section 8 Housing Choice Voucher program in 34 of the 44 counties in Idaho – including Fremont, Teton and Madison Counties. IHFA manages 1,200 Vouchers in the area, holders of which may live in any one of 16 counties. Presently, only 34 Voucher holders reside in the Idaho study area: 24 in Madison County, 5 in Fremont County and 5 in Teton County. IHFA has a 32-month waitlist for Vouchers.

No Voucher holders reside in Teton County, Wyoming. A program was attempted in the 1990's. Difficulties were encountered due to the scarcity of rentals available, high cost of development, high rents and landlords being either unable or unwilling to keep up with necessary repairs.

**Section 8 Voucher Participants by County: 2014**

Location	# Voucher Holders
<b>WGYA</b>	<b>34</b>
<b>FREMONT COUNTY, ID</b>	<b>5</b>
Ashton	0
Island Park	0
St. Anthony	5
<b>MADISON COUNTY, ID</b>	<b>24</b>
Rexburg	22
Sugar City	2
<b>TETON COUNTY, ID</b>	<b>5</b>
Driggs	3
Victor	2
<b>TETON COUNTY, WY</b>	<b>0</b>
Jackson	0

Source: Idaho Housing and Finance Agency (IHFA);  
Community Resource Center, Jackson, Wyoming.

***Employer Assisted Housing***

About 4% of regional households indicated on the 2014 Housing Survey that they receive housing assistance from their employer, equating to about 1,000 households. Just over one-half of these households are in Teton County, Wyoming (about 580 total). This assistance may be in the form of down payment or mortgage assistance, free housing or supplying a place for workers to rent.

Major employers in Jackson Hole, primarily public sector, have provided over 360 units of housing for their employees. Many smaller employers also provide housing for their employees. According to a 2012 employer survey, approximately 1,400 peak season employees in Jackson Hole reside in housing provided by employers.

Prior to 1980, the provision of farmworker housing for seasonal workers was also more prevalent. While all counties maintain provisions in their land development codes that permit farmers to provide such housing, few if any applications have been made in recent years. The combination of seasonal workers moving into the region on a more permanent basis, increased consolidation and automation of agricultural operations and increased diversity of employment opportunities has decreased the need for this type of housing.<sup>15</sup> This is discussed further in the Policies and Resources section of this report.

<sup>15</sup> The Fremont County Comprehensive Plan notes that this shift began in the 1980's and 1990's, as Hispanic/Latino households that previously came to the area each season began taking up permanent residence in the county. Increased diversity of employment options in non-agricultural seasons assisted this shift. Interviews with local agricultural employers confirm this trend, where most of their seasonal workers are now permanent residents in the area.

**BYU-Idaho Student Enrollment and Housing**

BYU-I had 12,800 students in the fall of 2007 and is expected to have 16,200 students in the fall of 2014. BYU-I projects enrollment to increase by about 1,000 students per year on average, reaching about 20,600 in the fall of 2018. Based on the historic mix of single and married students at BYU-I, this means that the single student body will increase from about 11,700 in 2014 to 14,800 in 2018 and married students will increase from about 4,500 to 5,800. As explained below, this is important because, as student enrollment increases, so will the demand and need for housing in Rexburg and neighboring areas.

**Student Enrollment at BYU-I: 2007 – 2020**

	Fall 2007	Fall 2014	Fall 2015	Fall 2016	Fall 2017	Fall 2018
<b># Students</b>	12,800	16,200	17,400	18,200	19,400	20,600
<b>Single</b>	9,200	11,700	12,500	13,100	14,000	14,800
<b>Married/other</b>	3,600	4,500	4,900	5,100	5,400	5,800

Source: Madison County "2020" Comprehensive Plan; BYU-I interview

All single students under the age of 30 are required to live in BYU-I approved housing, with limited exceptions. This includes housing that maintains separate buildings for male and female occupancy, are occupied solely by BYU-I students, and support BYU-I's apartment living standards.<sup>16</sup> BYU-I may approve such housing for students even if it is provided by another agency or organization or whether it is located on- or off-campus.

As of September 2014, BYU-I had 191 on-campus and 2,253 off-campus approved housing units, with a combined total of 14,366 beds. This should accommodate expected growth in single students over the next several years. In addition:

- An additional 52 units are under development for occupancy in the winter 2015 semester.
- The existing 828 on-campus beds will be replaced with 850 newly-constructed beds for the fall 2015 class of students.

<sup>16</sup> This is a very general summary. Please see BYU-I's Approved Housing Guidebook for more information. Approved units are exempt from the gender discrimination provisions of the Fair Housing Law under the Title IX Higher Education Act of 1972, as further described in the "Introduction" and "Fair Housing Legal Status" sections of this report.

**BYU-Idaho Approved Housing: 2014**

Location	# Units <sup>17</sup>	# Beds
On-campus	191	828
Off-campus	2,253	13,538
<b>TOTAL</b>	<b>2,444</b>	<b>14,366</b>

Source: BYU-I interviews; Consultant team

In general, married students, divorced students, widows or widowers and students with children do not qualify to live in BYU-I approved housing. These students search for other housing in Rexburg, Madison County, Fremont County, and, to a lesser extent, Teton County, Idaho. In the fall of 2014, this equates to about 4,500 students needing housing.

One affordable source of housing for these households are the 529 LIHTC, RD, and Section 8 units in Madison County. Full-time students can occupy LIHTC units if they meet one of five exceptions, including being married and eligible to file a joint tax return or being a single parent with dependent children.<sup>18</sup> Based on the 2014 Housing Survey and property manager interviews, upwards of 50% of affordable rental units in Madison County are occupied by a household with at least one adult student.

**Pending Development**

There are 1,334 residential units presently approved for or under development in the WGYA.

- The majority of this activity is in Rexburg (71%). Just under one-half of WGYA units under development are BYU-I approved housing;
- The 48-unit LIHTC in Rexburg will be located north of campus, near K-mart, instead of southwest of campus like the majority of other affordable rentals;
- Teton County, Wyoming, constitutes about 24% of this activity. The only affordable ownership units are under development in this county and, combined with the town of Jackson, 114 units of affordable rentals are being developed;
- The one unit under construction in Ashton is a Habitat for Humanity home; and

<sup>17</sup>Unit and bedroom counts include 315 units that are presently under development (North Point and Mountain Lofts).

<sup>18</sup> Full-time students generally cannot qualify for LIHTC housing unless they meet at least one of five exemptions: at least one member of the household must receive assistance under Title IV of the Social Security Act; at least one member must be enrolled in a job training program receiving assistance under the Work Force Investment Act or another similar federal, state, or local program; the household must include at least one single parent with minor children; all members are the household are married and can file joint tax returns; or at least one member of the household has exited the foster care system. See IRC § 42(i)(3)(D).

- The mobile home activity in Madison County constitutes a redevelopment of a 13-unit mobile home park in Rexburg's area of city impact. The development will replace the existing units and add 31 more homes.

### Approved or Under Development Projects: 2014

	Total Units	Market Units			Restricted/ Affordable Units	
		Single Family	Multi-Family	Mobile Homes	Single Family	Multi-Family
<b>WGYA</b>	1,334	237	922	49	12	114+
<b>FREMONT COUNTY, ID</b>	1+	Handful	0	0	1	0
<b>Ashton</b>	1	0	0	0	1	0
<b>Island Park</b>	0	0	0	0	0	0
<b>St. Anthony</b>	0	0	0	0	0	0
<b>MADISON COUNTY, ID</b>	987	45	898	44	0	48 LIHTC
<b>Rexburg</b>	943	45	898	0	0	
<i>BYU-I approved</i>	649	0	649	0	0	0
<i>Other</i>	294	45	249 <sup>a</sup>	0	0	48 LIHTC <sup>b</sup>
<b>TETON COUNTY, ID</b>	25	20 <sup>c</sup>	0	5	0	0
<b>Driggs</b>	0	0	0	0	0	0
<b>Victor</b>	5	5 <sup>d</sup>	0	0	0	0
<b>TETON COUNTY, WY</b>	321	172	24	0	11	114
<b>Jackson</b>	171	37	24	0	0	110

Sources: City/Town/County Interviews; Consultant team

<sup>a</sup> 216 of these units are apartments; the remainder are townhomes/duplexes

<sup>b</sup> These units are currently going through the approval process

<sup>c</sup> 2 to 3 of these units are accessory dwellings

<sup>d</sup> 2 of these units are accessory dwellings

### Cost of Housing and Availability

This section briefly describes the differences in the cost of housing and availability in the counties and cities and towns in the WGYA. A detailed analysis of housing market trends and current conditions is provided in the WGYA Housing Needs Assessment also conducted by our team and should be referenced for more information.

#### Rental Housing

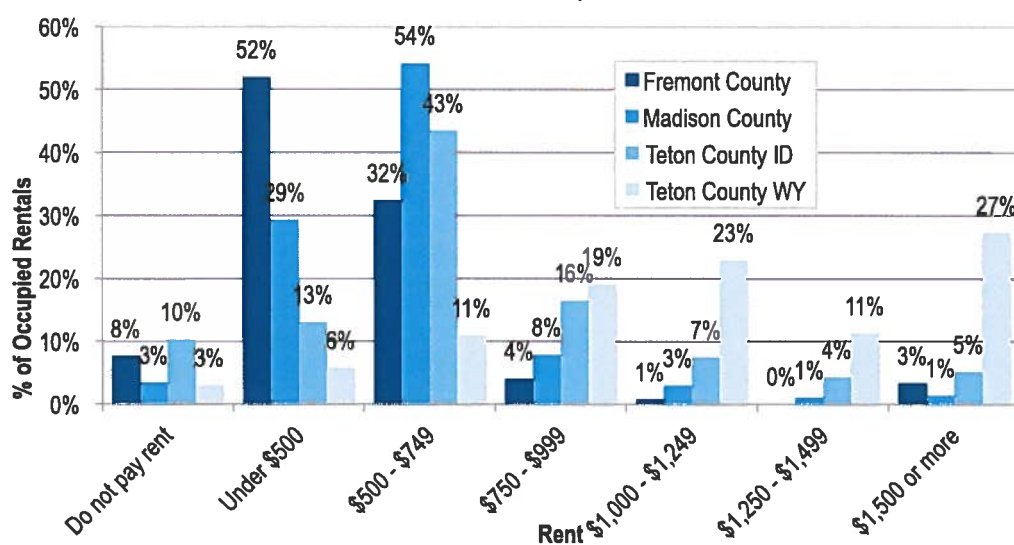
The distribution of rental units by rent shows significant differences by county:

- Most of Fremont County rentals are concentrated in the under \$500 range;
- Madison County ranges up to \$750, with few rentals priced over that value;



- Teton County, Idaho, ranges slightly higher – with one third of units priced over \$750 per month; and
- Teton County, Wyoming, has the most high priced rentals – 27% over \$1,500. Some renters were paying over \$3,000 per month.

**Distribution of Rents: Occupied Rentals  
WGYA Counties, 2014**



Source: 2014 Housing Survey

Rents for occupied units range from a low of \$490 in Fremont County to a high of \$1,200 in Jackson Hole. These medians include both market and subsidized/income restricted units. The market rates for units listed for rent are affordable at 43% AMI in Fremont County, but would require an income of 145% AMI in Jackson Hole.

The median rent for units listed in Teton County, Idaho, are about 40% higher than the rent paid for occupied units and, in Wyoming, about 145% higher. This confirms what property managers indicated – rents are rising and higher priced units are the ones available.



**Median Rents Vs. Units for Rent: WGYA Counties, 2014**

	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>Median Rent – Occupied Units</b>	\$491	\$560	\$675	\$1,200
<b>Median Rent –Units for Rent</b>	\$513	-	\$950	\$2,825
<b>MFI Required to Afford Median Unit for Rent</b>	43% MFI	47% MFI*	70% MFI	145% MFI

Source: 2014 Housing Survey; interviews; rental ads; consultant team

\*47% MFI affords the occupied unit rent in Madison County

By city and town, rents show little variation in Fremont County. Madison County and Rexburg and Teton County, Wyoming, and Jackson show little variation as well. Rents are higher in Victor than Driggs – Victor is more proximate to Wyoming for commuters.

**Median Rent Paid: WGYA 2014**

Location	Median Rent Paid
<b>FREMONT COUNTY, ID</b>	\$491
Ashton*	\$483
Island Park*	-
St. Anthony	\$495
<b>MADISON COUNTY, ID</b>	\$560
Rexburg	\$560
<b>TETON COUNTY, ID</b>	\$675
Driggs	\$650
Victor	\$700
<b>TETON COUNTY, WY</b>	\$1,200
Jackson	\$1,200

Source: 2014 Housing Survey

\*Ashton has a small sample size – presented for reference only.  
Island Park was too small to report.

Rental availability also shows some differences by county:

**Fremont County.** A total of 14 units were identified as being available for rent in July.<sup>19</sup> Twelve were available in St. Anthony and one each in Ashton and Island Park.

Vacancy rates varied by property – from 3.6% for a restricted rental project, up to 17% in a market project in St. Anthony.

The rental market varies widely in Fremont County. St. Anthony attracts BYU-I students. Unlike the rest of the region, vacancies are highest in the St. Anthony area during the summer months because of decreased student enrollment. Ashton is

<sup>19</sup> This information was compiled from researching Craigslist and interviews with a property management company that manages 12 units in the county and managers of four subsidized/income restricted apartment properties with 55 units combined.

relatively stable year round, while rental availability for seasonal employees is very limited during the summer in the Island Park area.

Madison County. Madison County had the largest inventory of units available for rent. Of market rate apartments researched, 39 units were available; six subsidized units were available in researched properties; and 86 units were advertised on Craigslist. Vacancy rates rise significantly in the summer (August) when students leave. Given the seasonal fluctuation it is hard to pinpoint rental vacancies, but research suggests it is typically below 6% when averaged over the year.

Teton County, ID. A total of 18 units were identified as being available for rent in July.<sup>20</sup> Vacancy rates ranged from about 1.7% to 3.3%, indicating a tight rental market with little choice for renters.

Teton County, Wyoming. A total of 14 units were identified as being available for rent in July.<sup>21</sup> Vacancy rates ranged between about 0.3% to 0.9% - the tightest rental market in the region, with almost no units available.

### ***Ownership Housing***

In terms of price, there are sharp contrasts in the region.

- Madison County has the lowest priced homes in the region. They align well with household incomes - the median price is affordable at 103% MFI. In July, 50 homes or nearly one-third of homes for sale were listed at prices that would be affordable for purchase by low and very low income households.
- The median price of homes listed for sale in Fremont County is \$62,000 higher than in Madison County, affordable at 136% MFI. This is due to homes located in the Island Park area. Prices in St. Anthony are lower than in Rexburg. Prices in the Ashton area are similar to those in Madison County. Fremont County has almost twice as many homes listed for sale as Madison County and 84 available for low and very low income households.
- The median list price for homes in Teton Valley has recovered to \$395,000, which is affordable at 200% MFI. Very few homes (7 total) are affordable for low and very low income households. Three-fourths of listings require an income greater than 120% MFI.

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<sup>20</sup> Based on information from the two largest property management companies in the county that, combined, manage 210 long term rental units, managers of four apartment complexes, Craig's List, and newspaper classified ads

<sup>21</sup> Based on information from the two large property management companies that combined manage 325 long term rental units; three free market apartment complexes with 494 units total; all of the five subsidized/restricted apartment properties with 178 units combined; and Craigslist and newspaper classified ads.

- Homes in Jackson Hole are expensive, even by international resort standards. The median list price of housing units for sale now surpasses \$2 million. This price is affordable for households earning 727% MFI. No units are listed for sale that would be affordable for low and very low income households. Realtors report entry level, first time buyers seek homes priced around \$500,000.
- In all except Fremont County, homes in the balance of the county (excluding properties in the city or town areas) were higher priced on average than within the city and town areas.

**Owner-Housing Payment, Price and Availability Summary:  
WGYA Counties and Cities/Towns, July 2014**

	Fremont County	Ashton Area	St. Anthony Area	Island Park Area
<b>Median Monthly Mortgage Payment</b>	\$662	\$652	\$796	\$600
<b>Median List Price – Homes for Sale</b>	\$241,900	\$182,000	\$114,000	\$279,500
<b>MFI Required to Afford Median Price</b>	136%	<136%	<136%	>136%
<b># Homes Listed for Sale</b>	293	41	46	191
<b># Homes Listed and Affordable for Households earning under 80% MFI</b>	84	-	-	-

	Madison County	Rexburg
<b>Median Monthly Mortgage Payment</b>	\$860	\$900
<b>Median List Price – Homes for Sale</b>	\$179,900	\$179,900
<b>MFI Required to Afford Median Price</b>	103%	103%
<b># Homes Listed for Sale</b>	159	142
<b># Homes Listed and Affordable for Households earning under 80% MFI</b>	50	-

	Teton County, ID	Driggs Area	Victor Area
<b>Median Monthly Mortgage Payment</b>	\$1,100	\$900	\$1,200
<b>Median List Price – Homes for Sale</b>	\$395,000	\$291,750	\$427,500
<b>MFI Required to Afford Median Price</b>	200%	150%	217%
<b># Homes Listed for Sale</b>	192	58	86
<b># Homes Listed and Affordable for Households earning under 80% MFI</b>	9	-	-

	Teton County, WY	Town of Jackson
Median Monthly Mortgage Payment	\$1,500	\$1,400
Median List Price – Homes for Sale	\$2,092,500	\$867,000
MFI Required to Afford Median Price	727%	300%
# Homes Listed for Sale	408	54
# Homes Listed and Affordable for Households earning under 80% MFI	0	0

Source: See WGYA 2014 Housing Needs Assessment

## Housing Problems

Beyond the availability of housing, households may experience other housing problems related to the condition of their home, the affordability of payments, overcrowding and housing insecurity issues related to threats of eviction or foreclosure and poor credit. These issues were probed in the 2014 Housing Survey. Results vary by county and community, as shown below:

Condition of home. The largest percentage of households in Fremont County reported that their homes were in fair or poor condition (18%) – rising to 21% of households in St. Anthony. This county has the oldest housing stock. Island Park is the only exception, however, as this community is heavily occupied by second homeowners and the housing stock consists of more higher-end homes than the other cities.

Cost-burdened. About 30% of all households in the WGYA are cost-burdened, meaning that they pay more than 30% of their household income for housing. The problem is most significant among Madison County residents – again largely related to the student population. Second is the high-priced town of Jackson, where over one-third of households are cost-burdened. Fremont County is generally more affordable (again, with the exception of Island Park).

Over-crowded. Over-crowded households, meaning households with more than two persons per bedroom, are most prevalent in Teton County, Wyoming, (7%) and Fremont County (5%).

### Housing insecurity.

- With the housing market now recovering, foreclosure is not as significant of a problem in the area. Only 1% of households in the WGYA reported being at risk of eviction or foreclosure, with households in Driggs being at most risk (4%).
- Teton County, Wyoming, shows the largest percentage of households that have been evicted or forced to move in the past (5%). Interviews with service

agencies in this county confirm that evictions have been on the recent rise due to the extremely tight rental market and landlords looking to raise rents and rent to lower risk tenants.

- Poor credit issues have affected the largest percentage of households in Driggs (9%). This has been less of a problem in Madison County (3%).

**Percentage of Households Encountering Housing Problems:  
WGYA and Counties, 2014**

	Condition of Home Fair or Poor	Cost- burdened Pay over 30% of income for housing	Over- crowded More than 2- persons per bedroom	Housing Insecurity		
				At risk of foreclosure/ eviction	Been evicted /forced removal	Unable to rent/buy due to poor credit
<b>WGYA</b>	16%	30%	4%	1%	3%	5%
<b>Fremont County</b>	18%	17%	5%	2%	2%	6%
<b>Ashton</b>	20%	12%	2%	0%	0%	7%
<b>Island Park</b>	6%	27%	7%	0%	0%	4%
<b>St. Anthony</b>	21%	15%	7%	2%	2%	6%
<b>Madison County</b>	15%	36%	2%	1%	1%	3%
<b>Rexburg</b>	17%	44%	2%	1%	1%	3%
<b>Teton County, ID</b>	12%	26%	3%	2%	2%	6%
<b>Driggs</b>	12%	28%	4%	4%	4%	9%
<b>Victor</b>	8%	25%	1%	1%	2%	5%
<b>Teton County, WY</b>	17%	31%	7%	1%	5%	4%
<b>Jackson</b>	18%	34%	8%	1%	6%	5%

Source: 2014 Housing Survey

These same problems were also analyzed by whether households were very low income (50% or less MFI) or were occupied by persons of Hispanic ethnicity. These households are not mutually exclusive – many Hispanic households earn under 50% MFI, but not all. Not surprisingly, these households were more affected by all problems than households on average:

**Condition of Home.**

- About 22% of very low-income (VLI) and 42% of Hispanic/Latino households were residing in homes in fair or poor condition.
- VLI households in Teton County, Idaho, had fewer problems (6%) than others.
- Hispanic/Latino households in Fremont County were predominately in homes in need of repairs (72%) – the majority of these households reside in mobile homes in this county.

- Energy efficiency upgrades, heating/plumbing/electrical, roof repairs and flooring were the most commonly needed repairs.

Cost-Burdened.

- About 73% of VLI households were more likely to be cost-burdened (73%) than Hispanic/Latino households (51%). This was true in all counties except Teton County, Wyoming, in which 82% of Hispanic/Latino households were cost-burdened.
- Fremont County was the most affordable for both types of households.

Over-Crowded.

- Over-crowding was more of a problem for Hispanic/Latino households (20%) than VLI households (10%), except in Teton County, Idaho, where a similar 7% each were over-crowded.
- Over-crowding was most prevalent in Teton County, Wyoming. Nearly one-fourth of VLI households and one-third of Hispanic/Latino households were over-crowded – this is significantly higher than the county average of 7%.

Housing Insecurity.

- Risk of foreclosure/eviction was higher for both VLI and Hispanic/Latino Households in each county than households in total. Fremont County had the highest percentage of each type of household being at risk.
- Past evictions/forced removal of these households was most prevalent for those residing in Teton County, Wyoming (11% each) – a lower 6% of all households in this county faced this same problem.
- Poor credit was more of a problem for Hispanic/Latino households in buying or renting than for VLI households in all counties except Teton County, Wyoming.



**Percentage of Households Encountering Housing Problems:  
Very Low-Income and Hispanic/Latino Households, 2014**

	Condition of Home Fair or Poor	Cost-burdened Pay over 30% of income for housing	Over-crowded More than 2- persons per bedroom	Housing Insecurity		
				At risk of foreclosure/ eviction	Been evicted /forced removal	Unable to rent/buy due to poor credit
<b>Very Low-Income Household (50% MFI or less)</b>						
<b>WGYA</b>	22%	73%	10%	3%	4%	7%
<b>Fremont County</b>	30%	35%	14%	5%	2%	9%
<b>Madison County</b>	22%	83%	4%	2%	1%	4%
<b>Teton County, ID</b>	6%	77%	7%	3%	5%	8%
<b>Teton County, WY</b>	22%	77%	24%	4%	11%	10%
<b>Hispanic/Latino Household</b>						
<b>WGYA</b>	42%	51%	20%	3%	7%	8%
<b>Fremont County</b>	72%	21%	23%	7%	4%	13%
<b>Madison County</b>	39%	34%	7%	3%	1%	5%
<b>Teton County, ID</b>	39%	48%	7%	3%	6%	12%
<b>Teton County, WY</b>	34%	82%	33%	2%	11%	6%

Source: 2014 Housing Survey. NOTE: VLI and Hispanic/Latino households are not completely separate; many Hispanic households earn VLI.

### Accessible Units

All counties and communities incorporate the International Building Code standards for developing ADA accessible units. All affordable rental projects also noted that over 50% of their units are either accessible or adaptable. Despite this, a significant percentage of households with at least one person with a disability noted that their current housing does not accommodate their disability (21%). Madison County had the lowest percentage of households with this problem (13%); Teton County, Wyoming, had the highest percentage (30%).

**Households with at Least One Persons with a Disability and  
Suitability of Housing: WGYA and Counties, 2014**

	% of households with disability	% in housing that does not accommodate their disability
<b>WGYA</b>	7%	21%
<b>Fremont County</b>	16%	24%
<b>Madison County</b>	8%	13%
<b>Teton County, ID</b>	4%	25%
<b>Teton County, WY</b>	4%	30%

Source: 2014 Housing Survey



This indicates that persons with such problems are either not locating suitable housing or may occupy older homes that are in need of upgrades. Based on survey comments, the most common problem are stairs, either within or accessing units; non-wheel chair accessible entry-ways or bathrooms; inappropriate parking; and problems accessing drawers and cabinets.

### Language Barriers

Persons of Hispanic/Latino descent may have additional obstacles to locating housing in an area due to language and cultural barriers. In 2000, about 31% of this population in the WGYA spoke English either not well or not at all.<sup>22</sup> To assist these individuals, it is important that communities recognize their presence and the potential for discrimination, whether intentional or inadvertent, and establish policies and support to eliminate barriers.

Based on responses to the 2014 Housing Survey from persons who speak primarily Spanish, 60% reported that they had problems finding housing in the area. Of those, about 7% reported that they encountered language barriers when searching for housing. This varied from a low of 5% in Fremont to a high of 20% in Madison.

#### Incidence of Language Barriers in Finding Housing: 2014

	WGYA	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>Had difficulty finding housing in the area:</b>	60%	29%	30%	52%	85%
<b>Why did you have difficulty finding housing?</b>					
<b>Too expensive</b>	76%	68%	80%	72%	80%
<b>Language barrier</b>	7%	5%	20%	6%	6%

Source: 2014 Housing Survey; small sample size, interpret with caution

Based on interviews with property managers of both income-restricted and market-rate rental units, all counties have room for improvement in terms of communicating information to persons of limited English proficiency. Based on interviews:

- All rental advertisements, when provided, are provided only in English;
- Between 50% to 70% of leasing offices have either a bi-lingual person on staff or access to an on-call interpreter; and
- Over one-half of affordable rental managers and only one-fifth of market-rate rental managers have leases available in both English and Spanish.

<sup>22</sup> Source: 2000 US Census

## FAIR HOUSING LEGAL STATUS

This section examines private barriers to Fair Housing choice and violations of the Fair Housing Act in the WGYA. It presents data on discriminatory practices both from the perspective of local residents and as based on secondary data sources. This includes:

- An overview of housing discrimination faced by respondents to the 2014 Housing Survey when either buying or renting homes in the region;
- Analysis of Home Mortgage Disclosure Act (HMDA) data covering lending practices in the region in 2012;
- A summary of state fair housing laws affecting the region and analysis of complaints filed with HUD from WGYA residents over the past ten (10) years; and
- A summary of legal cases concerning Fair Housing issues that either occurred in or that concern to the region.

### Discrimination in Accessing Housing

About 1,150 households (4%) in the WGYA indicate that at least one person in their home has experienced some form of discrimination when buying, selling or renting a home. This varies slightly by county..

The largest percentage of households experiencing discrimination is in Teton County, Wyoming (6% or 550 households). Teton County, Wyoming, not only has the tightest and highest price ownership and rental market in the area, but it also has the most opportunity for Fair Housing education and assistance. It is likely this increase is due both to scarce housing conditions, as well as education on rights.

#### Have you or a household member experienced discrimination during the sale/rental of your housing in the area?

	WGYA	Fremont County	Madison County	Teton County, ID	Teton County, WY
Yes (%)	4%	2%	3%	4%	6%
Yes (#)	1,150	80	355	160	550

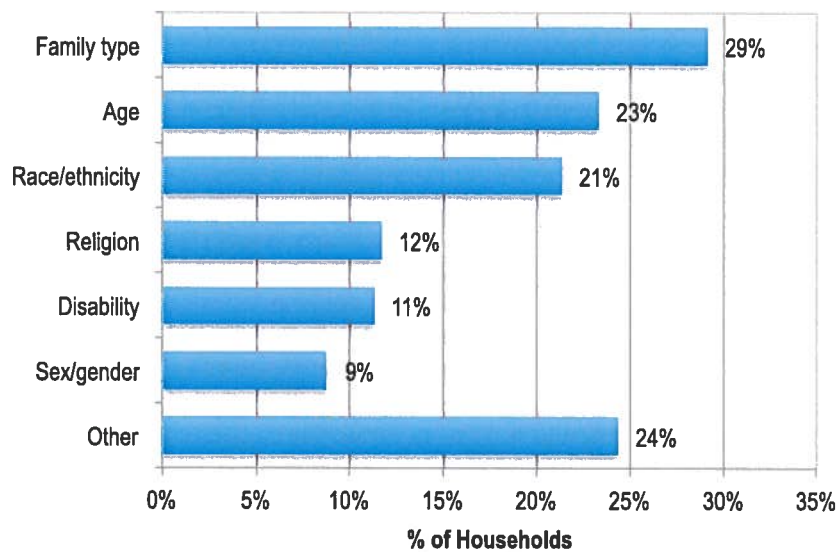
Source: 2014 Housing Survey

Households experiencing discrimination were asked what type of discrimination was involved. The largest percentage stated family type, followed by age, then race/ethnicity. "Other" types of discrimination primarily noted family type/size

problems, religion, income status and, although not covered by the FHA or ADA (unless it is an accommodation issue), pets. Comments indicated that:

- Family type discrimination ran the full range of household types – from young singles to single parents with children to couples with or without children.
- Age discrimination appeared to affect mostly young residents in their 20's.
- Religion affected the ability of some to rent homes, gain acceptance from neighbors after purchasing a home, and in realtor dealings while selling homes.

#### Type of Discrimination: WGYA, 2014



Source: 2014 Housing Survey

\*Totals over 100% due to multiple types experienced

Although sample sizes are small in Fremont and Teton counties in Idaho, the survey provides insight into varying degrees of discrimination around the region.

- Respondents in Wyoming were most likely to cite family type and age – households with kids and young singles (20's).
- Fremont County and Teton County, Idaho had problems more related to race/ethnicity and religion – including mixed race couples.
- Madison County residents cited family type and age – singles, roommate and unmarried households cited problems. One respondent indicated females were being charged more than males in her rental complex.

**What Was the Discrimination Related To:  
WGYA Counties, 2014**

	Fremont County	Madison County	Teton County, ID	Teton County, WY
<b>Family type</b>	26%	21%	10%	42%
<b>Age</b>	-	28%	25%	26%
<b>Race/ethnicity</b>	48%	16%	33%	15%
<b>Religion</b>	28%	17%	25%	-
<b>Disability</b>	28%	11%	6%	11%
<b>Sex/gender</b>	-	3%	3%	14%
<b>Other</b>	32%	26%	30%	20%
<b>TOTAL</b>	162%	123%	132%	127%

Source: 2014 Housing Survey

\*Small sample sizes in Fremont County and Teton County, ID, interpret with caution

\*Totals over 100% due to multiple types experienced

### **Mortgage Lending Practices**

This section analyzes Home Mortgage Disclosure Act (HMDA) data for loans made in 2012 (the most recent available). The purpose is to understand disparities in high-cost lending and loan denials across different racial and ethnic groups within the WGYA and by geographic area.

The data focus on homeowner mortgage applications received by lenders for first-lien, owner-occupied home purchases of one- to four-family dwellings and manufactured housing units in the region. HMDA data also reports on loans for various purposes, including loans used to purchase homes, loans to make home improvements and refinancing of existing mortgages. For purposes of the below:

- A home purchase loan is any loan made for the purpose of purchasing a housing unit;
- A home improvement loan is used, at least in part, for repairing or improving a home or the property on which it sits; and
- Refinancing is any dwelling-secured loan that replaces another dwelling-secured loan to the same borrower.

HMDA information helps to determine whether financial institutions are serving the housing needs of their communities and also helps to identify possible discriminatory lending practices and patterns.

**Number of Loans.** There were almost 3,000 loan applications made in the WGYA in 2012. The distribution of applications is roughly equivalent to the distribution of the population in the region, which would be expected. Loan applications were slightly higher in Teton County, Idaho, compared to the population; whereas Wyoming was lower.

**Number of Loan Applications: WGYA 2012**

	Loan Applications	% WGYA Loan Applications	% WGYA Population
<b>WGYA</b>	2,973	100%	100%
<b>Fremont County, ID</b>	503	17%	16%
<b>Ashton (CT 9702)</b>	92	3%	-
<b>Island Park (CT 9701)</b>	125	4%	-
<b>St. Anthony (CT 9703)</b>	278	9%	-
<b>Madison County, ID</b>	1306	44%	45%
<b>Rexburg*</b>	678	17%	-
<b>Teton County, ID</b>	548	18%	12%
<b>Teton County, WY</b>	616	21%	27%
<b>Jackson (CT 9677, 9678)</b>	506	17%	-

Source: HMDA 2012

\*Rexburg = CT 9502, 9503, 9504

**Purpose of Loans.** Nearly three-fourths of the home loans made in the WGYA were for the purpose of refinancing existing loans. The majority of others were for home purchase and only 3% were for home improvements. Minor differences are worth noting:

- Home improvement loans comprised the largest percentage of loans in Fremont County. This county has the oldest housing stock. The largest percentage was in Island Park, however, which has higher priced homes than the rest of the region.
- Teton County, Idaho, was the only county for which refinance fell below 70% of loans. Home purchase were more common than other areas.

### Purpose of Loan Applications: WGYA 2012

	Purchase Home	Home Improvement	Refinance
<b>WGYA</b>	23%	3%	73%
<b>Fremont County, ID</b>	21%	5%	73%
<b>Ashton (CT 9702)</b>	20%	5%	75%
<b>Island Park (CT 9701)</b>	15%	9%	76%
<b>St. Anthony (CT 9703)</b>	23%	4%	73%
<b>Madison County, ID</b>	24%	3%	74%
<b>Rexburg*</b>	24%	2%	74%
<b>Teton County, ID</b>	28%	3%	68%
<b>Teton County, WY</b>	19%	4%	77%
<b>Jackson (CT 9677, 9678)</b>	21%	4%	75%

Source: HMDA 2012

\*Rexburg = CT 9502, 9503, 9504

HMDA provides information on loan applications by race, ethnicity and gender of the applicant. In the WGYA, only 19 applicants were of a non-white race – less than 1%.

- The origination rate of loans by persons of Hispanic ethnic and by non-white races are much lower than non-Hispanic and white applicants.
- Denial rates are similar across all classes, except for Hispanic applicants. One-third of their loans were denied compared with only 15% of non-Hispanic applicants.
- There was little discrepancy based on the gender of the applicant.

### Mortgage Action Taken by Protected Class: WGYA 2012

	Total applications (#)	Originated (%)	Approved, not accepted (%)	Denied (%)	Withdrawn/incomplete (%)
<b>Race/Ethnicity</b>					
White	2,394	65%	3%	16%	8%
Other race	19	53%	21%	16%	11%
Hispanic	63	49%	8%	33%	3%
Not Hispanic	2336	66%	3%	15%	8%
<b>Sex</b>					
Male	1,997	65%	3%	16%	9%
Female	485	65%	4%	18%	6%

Source: HMDA 2012



## By county:

- The high denial rate of Hispanic applicants occurred in Fremont County (57%) and Madison County (32%). Applicants had similar denial rates in Teton County, Idaho, regardless of ethnicity, and Teton County, Wyoming, did not deny any of its seven (7) Hispanic applicants.
- Denials of female applicants occurred at twice the rate of male applicants in Fremont County. Teton County, Idaho, shows a slightly higher denial rate for females, whereas both Madison and Teton County, Wyoming, show almost no difference.

**Number and Percent of Mortgage Denials by Protected Class:  
WGYA Counties, 2012**

	Ethnicity				Sex			
	Hispanic		Not Hispanic		Male		Female	
	#	%	#	%	#	%	#	%
<b>Fremont County</b>	8	57%	88	23%	74	21%	27	40%
<b>Madison County</b>	10	32%	144	15%	139	16%	22	17%
<b>Teton County, ID</b>	3	27%	104	23%	85	23%	32	28%
<b>Teton County, WY</b>	0	0%	16	3%	12	3%	5	3%

Source: HMDA 2012

**Fair Housing Complaints**

HUD has the primary authority for enforcing the Fair Housing Act. Individuals who believe that they have been victims of an illegal housing practice, may file a complaint with HUD or file their own lawsuit in federal or state court. The U.S. Department of Justice brings suits on behalf of individuals based on referrals from HUD.<sup>23</sup> HUD's regional office in Seattle covers Fair Housing issues in Idaho; the Denver office covers Wyoming.

When HUD receives, investigates, then files a complaint, HUD must first try to reach a conciliation or settlement between the parties. If the complaint is not successfully conciliated, HUD investigates the complaint and determines if there is "reasonable cause" to believe that discrimination occurred. If reasonable cause is established, HUD will issue its determination and charge the respondent with violating the law. A HUD Administrative Law Judge will then hear the case, unless the parties elect to bring the case in federal civil court. If federal court is elected, the Department of Justice will bring the claim on behalf of the plaintiff in U.S. District Court.<sup>24</sup>

<sup>23</sup> See the US Department of Justice website for more information:  
[http://www.justice.gov/crt/about/hce/housing\\_coverage.php](http://www.justice.gov/crt/about/hce/housing_coverage.php)

<sup>24</sup> HUD's website has complete information on HUD's Fair Housing complaint process and may be referenced for more information at:



### ***State Fair Housing Laws***

**Wyoming.** The state of Wyoming does not have a Fair Housing statute. A Fair Housing bill was brought forth in 2005 and again in 2007, but never passed. The Wyoming Fair Housing Act would have set up Wyoming's own enforcement entity to carry out state-made housing laws governing lease terminations, sanitation conditions, discriminatory rental practices and similar issues. Wyoming residents within the WGYA with Fair Housing complaints can contact the national HUD Office of Fair Housing and Opportunity (FHEO), Denver regional office, or local field office in the city of Casper. Other options include:

- **Access to Justice** in Jackson for self-help legal assistance, attorney referrals and free legal services for those who qualify;
- **The Community Resource Center (CRC).** CRC in Jackson refers potential Fair Housing complaints to Access to Justice for legal assistance and referrals;
- **Wyoming Legal Services.** This organization works with Access to Justice to find attorney assistance for qualifying low-income residents in need. They provide legal services for most civil matters, including fair housing issues. The office in Rock Springs covers Teton County, Wyoming.

**Idaho.** Idaho's fair housing act prohibits discrimination on the basis of race, color, sex, religion, national origin and disability. It does not recognize familial status as a protected class. The law is also different from the Federal Fair Housing Act in that it covers providers with two or more units or properties. Idaho's Fair Housing law is enforced through the Idaho Human Rights Commission.

Idaho has a toll free 2-1-1 Idaho Care Line to provide residents who may have a Fair Housing complaint to receive information and referral assistance. Residents may also contact:

- HUD's Office of Fair Housing and Opportunity (FHEO);
- The Idaho Housing and Finance Association (IHFA), who will refer complaints or questions to the appropriate service provider;
- The Intermountain Fair Housing Council (IFHC);
- Idaho Legal Aid, who will refer complaints to HUD; and
- The Idaho Human Rights Commission, who will refer complaints to HUD.

More information on each of these organizations is provided in the "Policies and Resources" section of this report.

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[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/complaint-process](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/complaint-process)

### *Local Resolutions, Policies and Ordinances*

Teton County, Idaho: has a Fair Housing policy in its County Code § 1-8B-1, et al, declaring:

It is the policy of the county to implement programs to ensure equal opportunity in housing for all persons regardless of race, color, religion, sex, or national origin. The fair housing amendments act of 1988 expands coverage to include disabled persons and families with children.

The county will help residents who feel they have been discriminated against file a complaint with HUD.

Victor: just passed an anti-discrimination ordinance adding Fair Housing, among other, protections for LGBT residents. It requires a complaint to be filed within 180 days of the discriminatory conduct and establishes such discrimination as a misdemeanor, punishable by fine or possible imprisonment.

St. Anthony: has a Fair Housing ordinance in its City Code § 9.12.010 et seq. Its purpose is to:

[E]stablish fair housing practices by ordinance in the city and to avoid discrimination and segregation in housing on the basis of race, color, religion, national origin, or sex.

It also creates a Fair Housing Commission, consisting of each member of the city council with the mayor as chairman. The Commission will receive and investigate fair housing complaints from residents and attempt to resolve complaints with reasonable grounds through conciliation or a hearing. If a hearing is held and the Commission finds that an unfair housing practice has been committed, it shall issue an order directing the respondent to cease such discrimination. Violation of the order may constitute a misdemeanor punishable in the court of Fremont County.

The city also signed a proclamation, declaring April 2014 as Fair Housing Month.<sup>25</sup>

Rexburg: adopted Fair Housing Resolution 2014-03 declaring that:

[T]he City will assist all persons who feel they have been discriminated against because of race, color, religion, gender, national origin, disability or familial status to seek equity under federal and state laws by referring them to the U.S. Department of Housing and

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<sup>25</sup> St. Anthony Fair Housing Month Proclamation, at [http://www.cityofstanthony.org/archive/misc/April\\_2014\\_Fair\\_Housing\\_Month\\_Proclamation.pdf](http://www.cityofstanthony.org/archive/misc/April_2014_Fair_Housing_Month_Proclamation.pdf)

Urban Development, Office of Fair Housing and Equal Opportunity,  
Compliance Division.

**Jackson:** passed Resolution 06-17 in 2006 resolving that the town of Jackson makes a firm commitment to eliminate discrimination in housing based on race, color, religion, sex or national origin. It specifies complaints should be sent to HUD and that the town will assist with community education, outreach, and instruction on Fair Housing law.

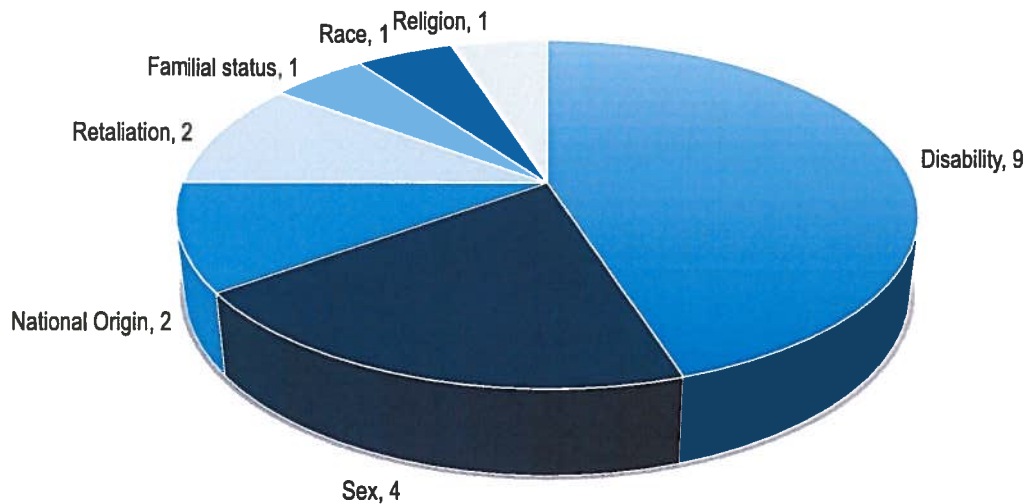
**WGYA Fair Housing Complaints**

Since 2004, a total of 17 Fair Housing complaints were filed with HUD from residents in the WGYA – just under 2 per year on average. Over one-half of the complaints are related to disability discrimination, with sex discrimination a distant second.

Complaints were brought for several issues related to these reasons, including:

- Landlords' refusal to rent
- Discriminatory housing advertising, statements or notices
- Discriminatory brokerage services
- Discriminatory terms, conditions, privileges or services and facilities
- Discrimination in terms, conditions or privileges relating to rental
- Discriminatory acts
- Not making reasonable modification
- Not making reasonable accommodation

**Number of Complaints by Reason: WGYA, 2004 - 2014**



Source: HUD's Seattle and Denver Regional Offices

Most complaints were filed by residents of Madison County (12), three were from Teton County, Wyoming, and two were from Fremont County. No complaints were filed in Teton County, Idaho.

- Over one-half of the complaints are related to disability discrimination, most of which were from residents of Madison County.
- Sex discrimination was second, all of which were from Madison County.
- Teton County, Wyoming, had the only complaints related to national origin discrimination and retaliation.

#### Reason for Complaint: WGYA Counties, 2004 - 2014

	Total #	National Origin	Disability	Sex	Familial status	Race	Religion	Retaliation
Fremont County	2	-	2	-	-	-	-	-
Madison County	12	-	6	4	1	1	1	-
Teton County, ID	0	-	-	-	-	-	-	-
Teton County, WY	3	2	1	-	-	-	-	2
<b>TOTAL</b>	<b>17</b>	<b>2</b>	<b>9</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>

Source: HUD's Seattle and Denver Regional Offices

NOTE: "Reason" totals exceed complaint totals because some complaints had more than one reason.

- Of the 17 complaints, three (3) are still open, all of which are disability complaints.
- Over one-half were resolved either through conciliated or withdrawn with resolution. These complaints concerned familial, disability, sex and religious discrimination.

#### Outcome of Filed Complaints: WGYA Counties, 2004 - 2014

	Total #	Open	Conciliated	Administrative closure	No Cause	Withdrawn with resolution
Fremont County	2	1	1	-	-	-
Madison County	12	2	4	2	3	1
Teton County, ID	0	-	-	-	-	-
Teton County, WY	3	-	-	-	-	3
<b>TOTAL</b>	<b>17</b>	<b>3</b>	<b>5</b>	<b>2</b>	<b>3</b>	<b>4</b>

Source: HUD's Seattle and Denver Regional Offices

### *Intermountain Fair Housing Council Intake*

IFHC provided a summary of the cases that they have worked on in Fremont, Madison and Teton counties in Idaho. Of 38 total intake records, 26 were related to Fair Housing issues:

- 21 were in Madison County;
- Almost one-half were related to service animal issues;
- Three (3) were referred to HUD; and
- One (1) resulted in an enforcement letter and five (5) were privately resolved.

#### **IFHC Intake Records and Fair Housing Issue: WGYA (Idaho)**

	Fremont County	Madison County	Teton County, ID
<b>Fair Housing Intake</b>	3	21	2
Disability - service animal	2	15	-
Disability - general	-	5	2
Landlord/tenant	1	-	-
Religion	-	1	-

Source: Intermountain Fair Housing Council, interview

### *Wyoming Legal Services Cases*

In the past year, Wyoming Legal Services has opened 32 cases on behalf of Teton County residents, 10 of which (or about 31%) were related to housing issues (including discrimination, foreclosure and mortgage issues, private landlord disputes, eviction, etc.). In comparison, only about 10% of all cases opened state-wide in the past year were related to housing issues.

#### **Legal Cases**

Recent legal cases were reviewed to determine significant Fair Housing issues and trends in the WGYA. Searches of the Department of Justice, the National Fair Housing Advocate case databases and a legal research tool, Casemaker, found only two cases involving the Fair Housing Act in the region: one arising out of Rexburg and the other from Jackson. A third case, from the U.S. District Court in Utah is discussed for its relevancy to BYU-I approved housing.

The major issues and outcomes of these cases are summarized below.

*U.S. v. Gardner (CIV 98-0455-E-BLW)*. The United States filed this case on November 16, 1998, after a determination by HUD that reasonable cause existed to believe that the owner of a four-unit building violated the Fair Housing Act by including the words "no children " in an advertisement for a vacancy in his building. Upon seeing the advertisement, two testers from the Idaho Fair Housing Council inquired about the vacancy. They were told by Mr. Gardner that occupancy by children was prohibited or restricted. The IFHC then filed a complaint with HUD alleging that Defendant discriminated in housing because of familial status.

The matter was resolved without trial. The consent order requires in part future compliance with the Fair Housing Act, including advertising in compliance with the Act, and that Mr. Gardner attend Fair Housing training and education.

*Dettmer v. Tonsager, 2:12-CV-00203-ABJ (D. Wy 2014)*. Plaintiff's rental application was denied by Aspen Creek Apartments in Jackson based on alleged Fair Housing Act and ADA violations. The court determined that Plaintiff's rental application was not denied based on discriminatory intent or purpose, but rather because he had been previously evicted and filed for bankruptcy. Defendant was not required to provide Plaintiff with a "reasonable accommodation" by ignoring his credit history because Plaintiff failed to provide sufficient evidence that the accommodations were necessary due to a disability. The court granted Defendant's motion for summary judgment, finding that Plaintiff failed to establish a *prima facie* case of FHA or ADA housing discrimination. Plaintiff also failed to prove "reasonable accommodation" discrimination under either the FHA or ADA.

*Wilson v. Glenwood Intermountain Properties, Inc., 876 F.Supp. 1231 (D. Utah 1995)*. Although not a case arising out of the WGYA, this case out of the District Court of Utah is relevant to BYU-I approved housing and Title IX exemptions. In *Wilson*, two unmarried Plaintiffs, one male and one female, neither of which have children filed suit against a property management company that operates BYU-approved housing. Plaintiffs tried to rent apartments from Defendant and were turned away for either being the wrong gender, not being students, or, when one Plaintiff represented that he was a single parent, he was told by Defendant that they do not rent to individuals with children. Plaintiffs alleged five causes of action claiming FHA violations, including discriminatory advertising, and gender, religious, familial status and "terms and conditions" discrimination. The Court determined that the sole issue it had to decide is whether BYU's off-campus student housing program, as applied and carried out by the Defendant, violates the Fair Housing Act. The Court granted Defendant's motion for summary judgment, holding that Defendant's actions were legal under the FHA and specifically authorized by the Title IX Education Act.<sup>26</sup> The case should be referenced for the full details of the Court's decision.

<sup>26</sup> See 20 U.S.C.1681 and 45 C.F.R. § 86.32 and the referenced court case for more information.

## **POLICIES AND RESOURCES**

This section contains an analysis of local and regional housing policies, procedures and resources to understand potential public barriers to Fair Housing choice. A brief overview of community services is also provided to better understand access to education, transportation, and health care in the region. This includes:

- Land use and zoning regulations related to group homes and ADA requirements and any general laws that may restrict the placement or provision of affordable housing or, alternatively, require or incentivize the development of affordable housing;
- Available local and regional Fair Housing access and enforcement resources;
- Affordable housing management and assistance services and policies for unit occupancy; and
- The location of and access to education, health, and transportation service needs in the region.

### **Land Use Policies**

Development and land use regulations may have the effect of limiting housing options through lot size requirements, density limits and limits on housing types that may preclude rental housing, multi-family housing and supportive housing or group homes. Such may operate to exclude the ability to develop a mix of housing options at various price points, limiting housing options based on income, or certain types of housing, such as homes for persons with disabilities, special needs or seniors. Policies can also operate to promote segregation in an area if, for example, all affordable housing options can be developed in only certain locations within a community.

In light of this, the development codes for each county and participating city were reviewed with particular regard to potential Fair Housing concerns. Interviews with each were also conducted to help place local development issues into context. Code review focused on:

- Group home and ADA permissions and requirements;
- Farmworker housing permissions in the counties;
- The ability to construct multiple types of housing, including mobile home parks, multi-family units and accessory dwelling units; and
- Any requirements or incentives for affordable housing development.

A brief summary of these regulations is provided in the following table and are summarized below.



### ***Accessible Homes***

As defined by HUD, accessible means that the dwelling unit or facility is located on an accessible route and when designed, constructed, altered or adapted can be approached, entered, and used by individuals with physical disabilities (24 CFR 8.3). Building codes should have accessibility standards that meet the accessibility requirements of the Fair Housing Act (42 U.S.C. 3604, Section 804(f)(3)(C)), at a minimum.

Governments may achieve this by incorporating the International Building Code (IBC) into local building codes. The International Code Council is committed to meeting or exceeding the accessibility requirements of the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA). When referenced in local, state or federal legislation, the International Building Code becomes the minimum requirement for construction. Accessibility requirements are incorporated into the International Codes as the codes are updated and the IBC is updated on a three-year cycle. As new technologies and accessibility provisions are incorporated into the IBC, jurisdictions that have adopted the code will ensure they are built into new construction.

All counties and communities in the WGYA have incorporated the International Building Code by reference into their building codes

### ***Group Homes***

The term "group home" refers to housing occupied by groups of unrelated individuals with disabilities. The Fair Housing Act prohibits local governments from exercising their land use and zoning powers in a discriminatory way. Therefore, the Act does not generally affect the ability of local governments to regulate group homes, as long as they do not discriminate against the residents on the basis of race, color, national origin, religion, sex, handicap (disability) or familial status (families with minor children).

Idaho state code prohibits governments from excluding group homes from their communities through zoning restrictions. Idaho Code § 67-6530 establishes the statewide policy that:

[P]ersons with disabilities or elderly persons are entitled to live in normal residential surroundings and should not be excluded therefrom because of their disability or advanced age, and in order to achieve statewide implementation of such policy it is necessary to establish the statewide policy that the use of property for the care of eight (8) or fewer persons with disabilities or elderly persons is a residential use of such property for the purposes of local zoning.

Idaho Code § 67-6531, further defines a “single family dwelling” for the purpose of any zoning law, ordinance or code to include “any group residence in which eight (8) or fewer unrelated persons with disabilities or elderly persons reside and who are supervised at the group residence in connection with their disability or age related infirmity.”

The state of Wyoming does not have any provisions related to group homes within its code.

- Two Idaho jurisdictions do not explicitly incorporate group home provisions pursuant to IC 67-6531 into their development codes: the city of St. Anthony and Madison County; although each jurisdiction recognizes that group homes are permitted in residential zones pursuant to state code.
- Teton County, Idaho, defines group homes differently than I.C. § 67-6531 and requires a conditional use permit process when permitted. The cities of Driggs and Victor incorporate the state’s definition, but each requires a conditional use permit process or special use process for approval.
- Teton County, Wyoming, and the town of Jackson both permit group homes within their development codes as an “institutional residential” use. The county permits group homes either with or without a conditional use permit (depending upon the zone) and permits no more than two people per bedroom. The town of Jackson requires a CUP for a group home with six (6) or more persons; smaller group homes do not require a CUP.

### ***Farmworker Housing***

Although not in recent demand by local agricultural employers, all counties in the WGYA provide the ability for working farms to provide on-site employee housing. This varies from explicit permission of seasonal farmworker housing and agricultural housing in Fremont County and Teton County, Wyoming, to the use of accessory dwelling units in Teton County, Idaho. No county has had any applications for farmworker housing in many years.

### ***Mobile homes, Multi-Family units and Accessory Dwellings***

Regulations permitting a variety of housing, through mobile home parks, multi-family dwellings and accessory units vary significantly throughout the region.

#### **Accessory Dwelling Units**

- Accessory dwelling units (ADUs) are permitted by all jurisdictions, ranging from a minimum of one per lot to an undefined maximum based on lot coverage. Some jurisdictions require conditional use permits for all ADUs, whereas others permit

them by right in most zones. ADUs may be used in the town of Jackson to help meet affordable housing standards.

#### Multi-family units

Multi-family units are permitted at various densities and through various methods in all jurisdictions.

- Given the lack of central water and sewer service in unincorporated counties, it is generally preferred that multi-family developments locate nearer city and town centers for access to central water/sewer/infrastructure. In Fremont County, for example, overlay zones permit multi-family units in most parts of the county, but the developer will need to meet water and sewer requirements. Madison County provides the most opportunities for multi-family development compared to other counties.
- The city of Rexburg permits the highest densities, followed by the town of Jackson; although it was noted that there is not much land zoned for high densities in Jackson and that existing zoning in the town may be too low to meet the future need for workforce housing. Alternatively, Rexburg likely has enough land and density to double its size without annexing.
- A model code for Teton County, Idaho, and the cities of Victor and Driggs is under development that is anticipated to allow smaller lot sizes, revised accessory unit standards and smaller scale housing. This should help these communities meet the rising demand from Teton County, Wyoming, workers and continue to provide more affordable housing for their local workforce.
- A model code for the entire region is also under development that is anticipated to allow for a variety of housing types. This code will provide a resource to other communities in the region should they seek to offer more options with regard to housing choice.
- Densities in the cities of Ashton, St. Anthony and Island Park are also relatively modest, but then demand for residential development activity has also been hard pressed to support more dense development in recent years. Island Park in particular has very rural densities, typically permitting no more than 1.3 units per acre under standard zoning. Infrastructure capacity and topography may limit densities in this area.

#### Mobile Homes

- Mobile homes (as opposed to manufactured homes on a permanent foundation) were permitted by most jurisdictions in mobile home parks (MHPs) only. These homes can provide an affordable source of market-rate housing in some communities, provided they are kept in good repair. MHPs were permitted in all WGYA jurisdictions as either permitted or conditional uses.

- In Island Park and Fremont County, it was noted that the provision of new MHPs was generally cost prohibitive once snow load and seismic standards for development were met, along with infrastructure improvements. Despite this, MHPs are permitted in Fremont County; Island Park and Ashton permit them in high density rural zones; and St. Anthony in residential and commercial zones. None of these jurisdictions have had MHP applications in recent years.
- MHPs are also permitted in Madison County and Rexburg. A recent redevelopment of a mobile home park in Rexburg's area of city impact was approved. This development is replacing 13 older homes and adding another 31.
- In Driggs, a redevelopment of a 13-unit MHP is currently under way. It is anticipated the city will do a safety audit of other mobile homes that could lead to condemnation of more units.
- High land costs were cited as an impediment to new parks being built in Teton County, Wyoming, and the town of Jackson. The town does allow existing parks, even if non-conforming, to redevelop/replace existing units, however.

#### *Affordable Housing*

- The comprehensive plans for each county in the WGYA supports the provision of affordable housing; however, only Teton County, Wyoming, has implemented regulations that require such development. The town of Jackson is also the only community that has mandated affordable housing requirements imposed on new development and some redevelopment.
- Driggs and Victor in Teton County, Idaho, are the only other jurisdictions with affordable housing provisions in their development codes. Both have affordable housing incentives that were put into place pursuant to a housing study conducted in 2007, before the recession. Both offer density bonuses to developers who provide affordable housing for households earning between 80% MFI and up to 120% or 175% MFI. The incentives have not been used and are in need of modification to remove outdated language.

### WGVA Development Codes

	Accessibility Standards	Group Homes	Manufactured/Mobile Home Parks	Farmworker Housing	Accessory Dwelling Units	Multi-family Housing	Affordable Housing Provisions
FREMONT COUNTY, ID	2012 IBC	Permitted in all residential zones in accordance with I.C. 67-6531 (8 or fewer unrelated persons).	Permitted in residential zones outside of the floodplain; 4 to 6 units per acre; open space requirements; central water, sewage, paved roads, 2 parking spaces.	Seasonal farmworker housing permitted (Appendix U, 1.106)	One additional permanent farm, caretaker or secondary dwelling per property permitted (Appendix U, 1.41 – 1.43)	Can locate in county – prefer in/near city service areas; infrastructure (water, sewer) requirements; Rural mixed use and rural village overlay zones – never used (product of last housing boom)	None
Ashton	2012 IBC	Permitted in all residential zones in accordance with I.C. 67-6531 (8 or fewer unrelated persons).	Units with foundation allowed in any residential zone; units w/o foundation permitted only in mobile home parks. Mobile Home parks allowed in Higher Density Zone through a discretionary Class II permit public review.	Not applicable	Allowed in upper floors of commercial buildings in Community Core zone; two-family dwellings allowed in Lower and Higher Density zones.	Up to 8 units in Higher Density Zone; more than 8 requires Class II permit public review.	None
Island Park	2012 IBC	Permitted in all residential zones in accordance with I.C. 67-6531 – Class I review if 8 or fewer persons; class II if larger.	Allowed in residential zones, but seismic and snow requirements make mobile homes cost-prohibitive. Mobile home parks permitted as high density residential through discretionary Class II review. Central water and sewer must be provided.	Not applicable	Two or more dwellings per lot allowed by Class II permit (e.g. parking, connection to sewer/septic). Performance zoning allows for multiple accessory dwelling units; the number of units attainable varies per	Allowed if a certain number of "points" are obtained through discretionary (Class II) permitting system; Developers must connect to Last Chance Water & Sewer or provide central water & sewer service if density exceeds 1 unit/acre.	None.

					performance review.		
St. Anthony	2012 IBC	Code does not permit group homes, but the city is currently revising its zoning code to allow group homes pursuant to state statute.	Mobile homes are allowed if on a foundation and if 75% of all property owners within a 150' radius grant permission; mobile homes not on a foundation only permitted in mobile home parks; mobile home parks are permitted in C-1 zone; conditional use in R-1 zone.	Not applicable	Up to 2 units per lot in R1. Allowed in R2 and C1 zones as "multifamily development."	Allowed in the C1, R2 zones; conditional use in the R1 zone. Subject to bulkheight restrictions and other development standards. Density requirements vary in C-1; need > 11,250 sq. ft in R-2 to build more than 4 units.	None
MADISON COUNTY, ID	2012 IBC	No group home provisions in code, but no review process as long as homes meet IC 67-6531 definition.	Mobile home parks permitted in residential zones; new parks on no less than 2 acres; max 7 units per acre; septic must be centralized and approved by eastern Idaho Public Health; 5% of land reserved for recreation area	Able to provide farmworker housing as accessory units, hostels, or other approved agricultural zone structures.	Accessory units allowed in all but commercial and heavy industrial zones.	Rexburg code governs in areas of city impact (permitting city densities); multi-family densities permitted in most zones except agriculture and heavy industrial.	None
Rexburg	2012 IBC	Permitted in all residential zones in accordance with I.C. § 67-6531.	Recent revisions; MH parks permitted in all residential zones except low density zones; 8 units per acre; 4-acre parcel minimum, 8% reserved for recreation area.	Not applicable	Permitted in residential business district with CUP	Up to 24 units in medium density residential zones; 48-units per building in high density; dorms and buildings over 48-units as conditional uses in some zones.	None
TETON COUNTY, ID	2012 IBC	Conditional use in the R1 & C2 zones; prohibited	Manufactured homes allowed in every zone except M1; mobile	Only allowed through accessory dwelling	1 accessory dwelling permitted per lot everywhere except	2+ units allowed in R1 zone; prohibited everywhere else.	None



		everywhere else; definition different than I.C. 67-6531	home parks only allowed in R2 zone (min lots size 7,000 sq ft) – min 3 acre parcel for new parks.	development, however no limit on bedrooms (which could provide worker housing)	R2 and M1 zones.	Subject to bulk/height restrictions and other development standards.	
Driggs	2012 IBC	Defined pursuant to I.C. 67-6530 (8 or fewer unrelated persons); CUP in R2, R3, C1.	Mobile homes only permitted in mobile home parks	Not applicable	Allowed in R1, R2, R3, ADR-0.5, ADR1, ADR2.5, and MUR zones. One unit allowed per lot.	Up to 4 units allowed by-right in R2, R3, C1. More than four units by-right in R3 and conditional use under R2 and C1. Conditional use in CBD. Density of 7,000 sq ft for first 2 units plus 1,000 sq ft per additional unit (R3), plus lot coverage requirements.	Density bonus up to 15% for affordable housing in mixed-use residential zone; 80-120% MFI; requires development agreement with non-existent county housing authority.
Victor	2012 IBC	Special Use in Transitional Business, R2, and R3 zones. Administrator can make "like interpretations" for Central & General Business districts.	Mobile homes only permitted in mobile home parks; permitted or special use in all zones except Trail Creek (floodplain) and Central Business Overlay	Not applicable	Allowed by-right in R1, R2, and TND Overlay. One per lot allowed.	Allowed by-right in TB, R2 (4 units max), R3 (up to 16 units) and TND Overlay. Special Use in CB and GB.	Traditional Neighborhood (TND) Overlay offers up to 20% density bonuses for affordable housing, 80-175% MFI; requires development agreement with a non-profit or non-existent county housing authority.
TETON COUNTY, WY	2012 IBC	Institutional residential by-right in AC zone; Conditional use in AR, S, R, and P/SP zone; no more than two persons per bedroom.	Only permitted in mobile home parks; could be developed under PRD ordinance (however land costs typically make this option unviable)	Ag employee housing permitted on working ranch/farms greater than 70 acres; mobile homes permitted as ag employee housing.	Permitted in AR, AC, R, BC, NC, OP, BP, P/SP, WC zones. Two accessory dwelling units per lot in AR zone. One accessory dwelling per lot in R, BC, NC, OP, RB. No apparent limit on	Allowed within a Planned Residential Development, which is permitted only in the AR, AC, S, R, and OP zones; also developable in Planned Resorts	25% inclusionary requirement for all residential development; commercial employee mitigation



	number of units in P/SP and WC units						
Jackson	2012 IBC	Institutional residential use (defined as a use housing more than 6 unrelated persons) is CUP in all zones (except business park); if housing 6 or fewer unrelated persons, then no CUP needed.	Permitted in mobile home park zoning district and as Planned Residential Development; open space requirements, 2 parking spaces per home; if nonconforming use: can upgrade/replace homes in the existing park, but cannot add more units.	Not applicable – county issue; Agricultural employee and working ranch subdivision standards deleted from code.	Permitted in many zones (Section 2370), potentially up to 2 units per lot; may help satisfy Employee Housing Standards.	Permitted in Planned Unit and Planned Residential subdivisions in many zones (apartments, condominiums, townhomes); Condominium and townhouse subdivisions permitted in additional zones.	25% inclusionary requirement for new subdivision; commercial employee mitigation; 25% density bonus in non- residential zones if used for affordable housing. Units can be provided by on-site development, off-site development, land or fee-in-lieu. Serve low, moderate and middle- income households. Ownership and rental.

Source: Local Development Codes; town, city and county interviews; consultant team

### *Other considerations*

Two other Fair Housing considerations were probed as related to development and redevelopment in WGYA jurisdictions: provisions relating to addressing displacement of households from redeveloped properties and problems with NIMBYism regarding affordable or more dense development.

#### Household displacement

- The town of Jackson was the only jurisdiction that has any regulations in place to help address displacement from development. Regulations are limited to situations where apartments are being converted to condominiums – existing tenants must be given the first right of refusal to purchase their unit. This was a significant issue just prior to the recession. For other types of redevelopment, no displacement provisions are in place.
- The city of Rexburg has also faced significant redevelopment over the years. The city recently lost a mobile home park to a fire; however, this coincided with the redevelopment and expansion of another park, but not because of any city requirements. Most occupants of the lost park are able to relocate to the new park.

Also, with the expansion of BYU-I housing development, the city has been losing smaller residential developments, particularly single family homes, near campus. No relocation or displacement provisions are in place.

- Finally, the city of Driggs has also been facing challenges with older mobile home parks that have less than adequate infrastructure and units in poor condition. As these units need to be replaced, there are no formal relocation policies in place, although the city does try to work with developers to encourage assistance. With a recent redevelopment of 13 homes, the landlord did accommodate the tenants that needed to be relocated while units were replaced.
- Fremont County noted that this has not been a significant issue in the area. Most of the redevelopment that occurs is renovation of existing single family homes; large redevelopment projects have not been taking place.

#### Not-In-My-Backyard (NIMBY)

Some jurisdictions have faced recent issues with NIMBYism related to providing affordable housing for residents. Briefly:

- Habitat for Humanity's first projects in Ashton were not met favorably by many residents. As knowledge of the program has increased and units are being built, some barriers are coming down;

- In the town of Jackson, community character issues often clash with the need for increased bulk and density to meet the needs of local workers; and
- Many residents in the city of Victor perceive the city as “being affordable,” adding resistance to policies and projects intended to provide more locally affordable homes.

## **Affordable Housing Management and Assistance Services**

### ***Teton County Housing Authority (Wyoming)***

The focus and mission of the Teton County Housing Authority (TCHA) is to enable housing opportunities for local workers and works to further the community’s goal of housing 65% of the workforce locally. To this end, TCHA manages about 370 restricted ownership units and the restrictions on 400 rental units that have been developed through the town of Jackson and Teton County development requirements or by the agency through funding, such as the Special Purpose Excise Tax that voters elect, developer fees, grants and partnerships, such as with Habitat for Humanity.

TCHA manages housing programs for Affordable, Attainable and Employment-based homes. Affordable homes fall into six categories of affordability and price point levels. Applicants must income-qualify and meet asset limit requirements. Units also have local employment requirements. All applicants must first enter a lottery and be selected to have an opportunity to purchase the home. Lottery preferences are given to households based on employment tenure and household size compared to preferred unit size and fall into the following four tiers:

- First preference: One adult in the household has worked in Teton County for at least four consecutive years OR is currently an emergency services worker in the County AND there is at least one person per bedroom;
- Second preference: The household has worked in Teton County for less than four years AND there is at least one person per bedroom;
- Third preference: One adult has worked in Teton County for at least four years AND there is less than one person per bedroom;
- Fourth preference: The household has worked for less than four years in Teton County AND there is less than one person per bedroom.

Applicants within each preference group are selected at random and those selected from the first preference group are given first option to purchase the home. Most homes are priced affordable for households earning under 100% MFI, but some extend to 200% MFI. Affordable homes have an appreciation cap.

Attainable Homes target higher income earners and allow initial homebuyers to build homes for themselves. There is no lottery for attainable homes. These homes have no appreciation cap, but the buyers income and asset limits create a ceiling that controls the resale price. Such homes generally range from \$300,000 to \$550,000. Some attainable homes have sunset clauses that allow the owner to sell at a market price if they own it continually for a designated period of time (20 to 30 years). The clock starts over each time the home sells.

Employment Based homes are located in Jackson and Teton Village. These homes have no income or asset limits and can target higher income earners that still cannot purchase at free market prices. There is also no lottery. The only requirement is that applicants must have been working in Teton County full-time for at least two years and earn 75% of their income locally. Occupants must retain such employment while living in the home, but may continue to own the home if they retire as long as they are 62 years old and reside in the home full time. These homes typically sell for between \$180,000 to \$490,000.

### *Jackson Hole Community Housing Trust*

The Housing Trust is a private, non-profit organization, located in Jackson, Wyoming. It builds and advocates for affordable homeownership in the Jackson Hole area with support from tax deductible donations, which average about \$1.1 million per year.

JHCHT has developed 103 permanently deed-restricted single family homes, duplexes, townhomes and condominiums since its inception in 1990, which currently serve over 200 members of the workforce. JHCHT has two additional developments planned – 11 units in partnership with the school district and 18 rental units on six lots recently acquired in east Jackson that will provide an ongoing source of revenue (rental income) for the organization's mission.

Each home is accompanied by a ground lease that allows homes to appreciate each year in tandem with an index that reflects the cost of living in this region. This ground lease ensures that Trust homes will always be affordable.

To qualify to purchase JHCHT homes, applicants must:

- Be over 18 years of age;
- Be a U.S. citizen or have permanent registered alien status;
- Have an annual income that does not exceed 120% MFI for Teton County, Wyoming;
- Have no more than \$232,400 in assets;
- Be pre-qualified for a mortgage;
- Work full time in Teton County, Wyoming. Applicants that do not work full-time will be reviewed on a case-by-case basis by the Homeowner Committee of the Housing Trust for potential eligibility; and

- Have an appropriate household size for the available home (i.e., up to 2-persons for a one-bedroom, up to 4-persons for a two-bedroom and no fewer than 2-persons for a three-bedroom).

Applications are kept on file until a home becomes available or the applicant requests to remove or update the application.

JHCHT also administers two down payment assistance programs. The first was created in 2004 using a federal Economic Development Initiatives grant of \$270,000. The monies were loaned with 30-year terms, deferred until the time of sale or refinance. No funds from this source are available at this time. JHCHT received a private donation of \$150,000 in November 2007 for a second down payment program. Loans of up to \$30,000, with matching funds, were provided. Currently all monies with matching funds are distributed.

### *Habitat for Humanity*

Habitat for Humanity is a non-profit that builds and repairs houses using volunteer labor and donations to make homes and renovations affordable for low-income households. It requires new homeowners to participate in its construction, provide money for a down payment and pay a mortgage on a 0% interest loan. Homeowners make mortgage payments to Habitat, who sells the loans and reinvests proceeds to build future homes.

Habitat for Humanity has long been active in Teton County, Wyoming, and has completed 27 homes since it was formed in 1995 and has four homes now under construction.

Habitat expanded into Fremont County, Idaho, in 2012, when the Idaho Falls affiliate received a \$1.4 million bequest from Kurt Kandler, an Ashton, Idaho, potato farmer. As a condition of receipt, the funds must first be used for the benefit of people in Ashton, followed by St. Anthony, Madison, Jefferson and Teton counties in Idaho. The goal is not to just build homes, but to make a bigger difference by trying to grow the funding by launching a community improvement initiative and focusing on the housing needs in the area, including home renovation.

Habitat's Idaho work has been met with challenges, primarily related to resident education about the program, type of assistance offered and goals to be achieved. Being an outside entity building in the small community has also been a factor of resistance by the community. As more projects are successfully implemented and local knowledge increases it is hoped that future projects will be met with more community support.

### *Idaho Housing and Finance Agency*

The Idaho Housing and Finance Agency administers the U.S. Department of Housing and Urban Development's (HUD) Section 8 Housing Choice Voucher program in the WGYC Idaho region. Presently, only 42 Voucher holders reside in the Idaho study area. No voucher holders reside in Teton County, Wyoming.

IHFA presently has a 32-month waitlist for Vouchers. The program has three basic preferences:

1. Applicants with a terminal illness, which typically have a one to three month wait time for a Voucher;
2. Families with children under 18 or elderly or disabled applicants, which typically have a 32-month wait time;
3. All other applicants, which typically remain on the waitlist at this time.

Once applicants are awarded a Voucher, they have 60 days to find a place to live, which is extended to 120 days for applicants with disabilities. All Voucher recipients must attend an IHFA briefing, informing applicants on how to find available units and use Housingidaho.com for their search. Recipients are also educated on their fair housing rights through a two-hour briefing and pamphlets offered in both English and Spanish. A language line is available for those with other language requirements.

### **Fair Housing Resources**

#### *WGYC Region*

The United States Department of Housing and Urban Development (HUD). HUD oversees, administers and enforces the Fair Housing Act. HUD's regional office in Denver, Colorado, oversees housing, community development and fair housing enforcement in Wyoming; the regional office in Seattle, Washington, oversees Idaho.

The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's office enforces the federal Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending and other related transactions. HUD also provides education and outreach and monitors agencies that receive HUD funding for compliance with civil rights laws.

Where present, HUD also works with state and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Programs (FHIP).

- FHAP funding is available on an annual, noncompetitive basis to state and local agencies that enforce fair housing laws that are substantially equivalent to the Fair Housing Act. This requires that the state or local jurisdiction enact a fair housing law that is substantially equivalent to federal laws. This provides HUD funding to such agencies to process federal fair housing complaints, reimburses

the jurisdiction on a per case basis and provides opportunities for partnerships to affirmatively further fair housing.

- FHIP is a competitive grant program that provides funds to organizations that provide education and assistance to individuals who feel they have been discriminated against while attempting to purchase or rent housing. Eligible activities include public education and outreach on fair housing rights and responsibilities, as well as fielding and responding to fair housing complaints, including testing and litigation.

No agencies in Idaho or Wyoming participate in the FHAP program. Only Idaho has organizations receiving FHIP funding (Idaho Legal Aid and the Intermountain Fair Housing Council).

### ***Idaho***

Idaho Housing and Finance Agency (IHFA). IHFA is a self-supporting financial institution and administrator of affordable housing resources. It does not use any state-appropriated funds for its operations. Its mission is to provide funding for affordable housing opportunities in Idaho communities where they are most needed and when it is economically feasible. IHFA participates in all phases of real estate development, finance, management and tenant support. It also functions as an agent for the U.S. Department of Housing and Urban Development and performs a wide variety of tasks associated with financing, developing or managing affordable housing.

In the WGYA, as discussed in the Housing Profile section of this report, IHFA administers HUD's Section 8 Housing Choice Voucher program in Fremont, Teton and Madison Counties. If IHFA receives calls regarding potential discrimination issues, they refer the caller to Intermountain Fair Housing Council or HUD or Idaho Legal Aid Services for further assistance.

Idaho Legal Aid Services (ILAS). ILAS is a non-profit law firm and community education organization with particular focus on providing access to justice for low-income persons through advocacy and education. This organization has used FHIP funding to help provide a statewide fair housing/fair lending education and outreach program, targeted at low-income rural populations, persons with disabilities, recent immigrants, and single female heads-of-households with children. This includes free counseling for homeowners at risk for mortgage default or foreclosure; conducting fair housing/lending presentations; and staffing a bilingual, toll-free housing hotline. It also maintains a website with significant self-help information on a variety of issues, including Fair Housing, presented in both English and Spanish. ILAS offers a fair housing/lending legal advice line for all Idaho residents regardless of income. ILAS provides free civil legal assistance to low-income residents and refers housing discrimination complaints directly to HUD.



Intermountain Fair Housing Council (IFHC). IFHC is a non-profit organization that promotes fair housing practice for housing consumers and housing providers throughout Idaho. IFHC:

- Provides information and education services to housing consumers, housing providers, community organizations, and lending institutions;
- Monitors fair housing compliance of housing providers, lending institutions, and local and state governments;
- Engages in enforcement activities which include investigation, testing, and complaint filing with State or Federal authorities and
- Negotiates fair housing settlements by mediation, conciliation, or litigation, if necessary.

IFHC used FHIP funds to provide its full-service fair housing enforcement program throughout Idaho. It maintains a website with self help resources, provided in both English and Spanish.

Idaho Human Rights Commission (IHRC). IHRC is an independent agency established by the Idaho legislature to help protect persons within the state from illegal discrimination. The agency enforces the state's Fair Housing Law and may be contacted by persons who feel they may have experienced a Fair Housing violation. It will investigate discrimination complaints by persons in the areas of employment, housing, education and public accommodations and provides a website that assists residents in filing their own complaints. Discrimination complaints are referred directly to HUD.

### *Wyoming*

Access to Justice. Access to Justice is a legal resource center available to Teton County residents. The organization offers many services, including:

- A self-help legal resource center
- Reference assistance in legal resources 1:00 to 5:00 p.m. weekdays
- Free seminars in legal topics, including eviction and fair housing issues
- Free law clinics offered periodically
- Intake to determine eligibility for further free legal services
- Free civil legal services to income eligible persons within the priorities set by statute (up to 10 hours)
- Referrals to pro bono or reduced-fee attorneys

The Center often collaborates with Wyoming Legal Services to help provide local seminars, education and attorney assistance, and locate attorneys for case referral.

Wyoming Legal Services. Aside from providing free legal assistance to income-qualified households (see the Complaint section of this report), the organization hosts a variety of community outreach programs across the state. This may include

organizing community meetings and informative discussions regarding fair housing issues and resources available to residents. Notification of meetings may be posted in city centers and libraries and local attorneys may be recruited for pro-bono assistance in hosting seminars and being available to provide advice to qualifying residents. The organization often works with Access to Justice to provide needed services in Teton County and Jackson.

Community Resource Center. The Community Resource Center is a 501 (C) 3 Wyoming not-for-profit Corporation that was created in 2003 by the Presbyterian Church of Jackson Hole. CRC provides direct assistance and tailored programs to help families and individuals become self-sufficient. CRC also provides a central hub for assistance applications and the distribution of resources. Assistance provided may include grants to help keep people in their homes (e.g., mortgage assistance) and help tenants afford to move into a new home (e.g., assist with monies needed to cover required first month, last month and deposit payments). Other service agencies may refer clients to CRC when such clients need financial support. Likewise, CRC collaborates with other agencies to ensure their clients receive the support they need, including, but not limited to:

- *Community Entry Services*, providing a full array of services to persons with developmental disabilities;
- *Latino Resource Center*, providing assistance to the Latino community in the greater Jackson Hole area;
- *Senior Center of Jackson Hole*, providing a range of services to enhance and support the lives of senior citizens and assist them in independent living. This may include congregate and home delivered meals, education and training, in home services, family care giver training and support groups, and on-call transportation services during the week (with wheelchair access);
- *Climb Wyoming – Teton County*, a non-profit organization, which trains and places low-income single mothers in careers that support their families and includes employer-driven job training and placement, life skills and parenting training, counseling and support to ensure self-sufficiency and economic security;
- *Jackson Hole Community Counseling Center*, promoting mental wellness and providing a full range of essential mental health services in Teton County. Services are provided on a sliding fee scale to ensure service availability to all persons, regardless of ability to pay; and
- *Wyoming Department of Workforce Services, Division of Vocational Rehabilitation*, works in partnership with consumers and other stakeholders to provide services and advocacy resulting in employment, independent living and equality for individuals with disabilities.

## **Government and Other Services**

Access to public transportation, schools, and health care varies throughout the region. Disparities do not exist so much by individual neighborhood as they do by broad geographic area. The varied densities and rural nature of the area – from only one-person per square mile in northern Fremont County to a population of 26,500 plus a 15,000-student campus in an area just under 10 square miles in Rexburg – contributes to the disparate location and provision of services in the WGYA. This information is presented both to highlight the challenges presented in providing public services in the primarily rural region and to identify where gaps in service may create challenges for residents and potential Fair Housing disparities in access.

### ***Public Transportation***

Public transportation can provide commuters with options to link them to jobs and be a necessary service for seniors who can no longer drive, low-income residents with limited or no access to a personal vehicle, and persons with disabilities and limited mobility.

There are only two public transportation providers in the WGYA: Targhee Regional Public Transportation Authority (TRPTA) and Southern Teton Area Rapid Transit (START). BYU-I does not provide or sponsor any transportation for its students unrelated to approved academic classes and Fremont County does not have a public transportation provider located in the county. No existing public transit provider serves the WGYA north of St. Anthony.

- TRPTA serves part of the WGYA in Idaho, including Rexburg in Madison County, St. Anthony in Fremont County, and Driggs and Victor in Teton County. It has no fixed service routes in the WGYA – it is an on-demand, door-to-door service only and operates from 7 a.m. to 5 p.m. Monday through Friday. It offers reduced fares to seniors and persons with ADA-eligible disabilities.

Rexburg fixed-service routes have been proposed, but have not been implemented due to lack of city/county matching funds.

- START is based out of Teton County, Wyoming. Its service area includes the cities of Victor and Driggs and the town of Jackson and Teton County, Wyoming, in the WGYA. It has multiple fixed routes in Jackson and Teton County, Wyoming; a fixed commuter route from Driggs and Victor; and a fixed commuter route from Star Valley in Lincoln County, Wyoming (which is south of Jackson).

Free in-town shuttle service occurs at 30 minute intervals between 6 am and 11 pm and routes between Jackson and Teton Village provide service about every hour between about 6 am and 11 pm every day. The commuter routes are not free (\$8 one way) and are limited to two service times between about 5:30 am and 7:30 am each morning. Commuter buses leave the town of Jackson in the

afternoon, with last service around 5 pm. Route times vary seasonally, with reduced service in the fall and spring.

START also offers paratransit service on-demand from 5:15 am to 11 pm every day, with reduced service in the fall and spring.

- Limited transit is provided by a private company, Salt Lake Express, within the Rexburg to Island Park area, plus service to Jackson, Wyoming. This service has designated pick-up locations within each jurisdiction, but will also provide door-to-door pick-up via reservation. It is available to transport persons from Island Park, for example, to the Idaho Falls Airport for a cost upwards of \$40, and offers generally two fixed pick up times per day. It is not a generally available service that assists populations in need of local transit to access jobs, groceries, and other needs.
- On-call transportation is offered by many senior centers in the WGYA, including St. Anthony, Ashton, and Jackson. These centers provide transportation within the towns and to the senior centers. The center in St. Anthony also provides monthly trips to Rexburg for medical care and other needs. The senior center in Rexburg coordinates with TRPTA for senior transportation needs.

#### ***Public Education***

Access to quality education is an important quality of life factor for families and opens up opportunities for a child's future. A quality school environment fosters low drop out rates, high graduation rates and sets the stage for life long learning. Segregation in schools has been equated with reduced school performance and higher incidence of students dropping out. In more dense regions, households may have several choices of various school districts in which to place their children; however, in the WGYA, options are more limited. This reinforces the need to provide adequate resources and support to existing programs to ensure a quality learning environment for the community as a whole. More specifically:

- Madison County has the largest public school system in the WGYA. It is served by the Madison School District in the Rexburg area and south and the Sugar-Salem District north of Rexburg, in Sugar City. Madison County School District offers six (6) elementary schools: three in Rexburg, two east of Rexburg and one to the south. One middle (grades 5 and 6) and one junior high school are located in Rexburg. The city also has a high school and an alternative high school.

Sugar-Salem district has one elementary, one intermediate (grades 4 to 6), one junior high and one high school, all in Sugar City.

BYU-I is also the only 4-year university in the WGYA.

- Fremont County has one public school district, although Sugar-Salem district does provide some service to students residing in southern Fremont County. Fremont County has four elementary schools, one each in Parker, Teton, St. Anthony and Ashton. The county has one junior high school located in St. Anthony, but the high school in Ashton takes grades 6 through 12. It has a second high school in St. Anthony. As of the mid-2000's, the district had adequate capacity, except for elementary schools.

School buses only travel designated bus routes, meaning that some households may need to drive their children to access the nearest bus stop. The number and layout of routes changes each year based on the need to serve all students.

There are no public schools located north of Ashton. About 270 children under the age of 18 (70 under the age of 5) resided in the greater Island Park area in 2010 (i.e., Census Tract 9701).

- Teton County, Idaho, has three schools offering K through 3<sup>rd</sup> grade (Driggs, Victor and Tetonia) and one for grades 4 to 6 (Driggs). The middle school is located in Driggs and the high school and alternative high school are in Driggs. In the mid-2000's, the middle school was at full capacity, with an average of 107 students in each grade.<sup>27</sup> The 2012-2030 Comprehensive Plan also supports adding additional funding and capacity for local schools.<sup>28</sup>

Another challenge in Teton County has been keeping up with the growth in Hispanic/Latino children in their school programs, which comprised about 22% of students in the mid-2000's.<sup>29</sup> At that time, the district struggled with funding the resources and staff needed to teach English as a second language, in addition to its regular curriculum. This will be a continuing need as this population continues to grow.

- Teton County, Wyoming, is served by one school district. It has one elementary school each in Alta, Kelly, Moran and Wilson and a K through 3<sup>rd</sup> and 4 to 6 school in Jackson, for a total of five (5) complete elementary programs. The one middle school and the high school and alternative high school are in Jackson.

Jackson also offers a couple opportunities for higher learning. Central Wyoming College is located in town. Students can take courses to improve job skills, receive a two-year associates degree, or take courses to prepare for a program at a four-year institution. The University of Wyoming also offers distance learning with several degree programs available in Jackson.

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<sup>27</sup> See the City of Victor Comprehensive Plan, Ch. 5, for more information.

<sup>28</sup> See the Teton County Comprehensive Plan, 2012-20130, p. 6-24 et al.

<sup>29</sup> See the City of Victor Comprehensive Plan, Ch. 5, for more information.

### **Regional Hospitals**

There are three full service hospitals in the WGYA. One in Rexburg, one in Driggs and one in Jackson, Wyoming. Fremont County no longer has a hospital. The St. Anthony hospital was closed and the Ashton Memorial Hospital closed in 1988 and became the Ashton Living Center for seniors. Unpaved rural roads and adverse weather conditions can all affect emergency response times and resident access to medical services from more remote areas of the counties.

It is over 50 miles from Island Park and over 25 miles from Ashton to the nearest hospital in Rexburg. About 16% of the population in each of these cities are seniors over the age of 65. Fremont County has a medical clinic in Island Park, two in St. Anthony and one in Ashton, along with senior assisted living facilities in Ashton and St. Anthony. Clinics were established as an economically viable option to provide quality medical care in Fremont County when the hospitals closed. Fremont County Emergency Medical Services has ambulances in Island Park, Ashton and St. Anthony, which are on call 24-hours, seven days per week.<sup>30</sup>

#### **Hospitals in the WGYA**

<b>Name</b>	<b>Location</b>
<b>Madison Memorial Hospital</b>	Rexburg, Madison County
<b>Teton Valley Hospital</b>	Driggs, Teton County ID
<b>St. John's Medical Center</b>	Jackson, Teton County WY

<sup>30</sup> See Fremont County Comprehensive Plan 2008 Revision, dated Dec. 17, 2008, pp. 117 – 119 for more information.