



July 9, 2018

Diane Stoddard
Assistant City Manager
City of Lawrence, Kansas
City Hall
6 East 6th Street
Lawrence, KS 66044

RE: Comments – Housing Market Study Update – June 4, 2018

Dear Ms. Stoddard:

At the June 4th, City of Lawrence Affordable Housing Advisory Board (AHAB) meeting, a Housing Market Study Update (Housing Study) June 4, 2018 was presented by the BBC Research & Consulting Company. Today's July 9th AHAB Meeting Agenda Item No. 6 includes a request for additional comments or data needs for the June Housing Study.

PROSOCO and Build SMART staff have reviewed this study and respectfully submit comments for the Board's consideration as priorities and desired outcomes are recommended to the City, developed and established for affordable housing in Lawrence.

Since the cost of electricity and gas bills are renters' second highest housing cost, right behind the rent itself, we were surprised to find no significant mention of utility cost or energy efficiency.

1. The Housing Study doesn't appear to identify what constitutes "adequate housing" including facility structure and premise conditions. If this is not defined, then how can improvements be measured when older housing stock is renovated?

2. The Housing Study doesn't appear to address utility costs and housing affordability. Utility costs can be significant particularly in older, poorly insulated or leaky rental units.
 - a. How do utility costs affect affordability?
 - b. Even though utility costs are seldom a driver in choice among housing options, to what extent do high utility bills factor into renters' decisions to move or to fail to be able to afford their rent?
 - c. Energy costs can contribute substantially to the overall financial burden of housing. Improving energy efficiency can reduce the energy cost burden on low-income households. EPA and HUD believe local governments can act to help reduce this burden by establishing policies and programs to address energy efficiency in housing. (EPA guide, "Energy Efficiency and Affordable Housing" We agree.
https://www.epa.gov/sites/production/files/2017-06/documents/affordable_housing.pdf)
 - d. Is utility data available per property?
 - e. To what extent would a targeted weatherization program improve housing affordability?
 - f. How do Lawrence landlords benefit from the additional income related to energy efficiency?
 - g. To what extent would a general improvement in energy efficiency of Lawrence's housing stock affect the local economy and cost of living ratings?
3. Specifically, the Housing Study doesn't address occupancy health including indoor air quality. Both are important aspects that have a significant impact on affordability and suitability of housing stock.
 - a. What is the correlation between respiratory health and affordable housing in Lawrence?
 - b. According to a HUD Census - 2013 American Housing Survey, almost 6.0 million homes (or 5% of all occupied units) have moderate or severe physical problems. Poorly constructed or maintained structures can impact health due to mold or poor indoor air quality that can lead to illnesses such as asthma <https://www.hudexchange.info/course-content/rural-gateway-peer-to-peer-conference-call-hud-s-office-of-lead-hazard-control-and-healthy-homes/Rural-Gateway-Conference-Call-OLHCHH-Slides.pdf>

4. Conclusions of the study do not appear to provide actionable data for developers related to affordable housing.
 - a. What is the current and projected shortfall of affordable housing in Lawrence?
 - b. What are the construction trends and current construction activity (active building permits) for single family, multifamily, condo, assisted living, etc?

In summary, we respectfully request that the AHAB consider priorities and strategies that include highly energy efficient building structures and occupancy health.

Feel free to contact me if you have questions at (785) 830-7323. Thank you for your consideration.

Sincerely,

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