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## Exhibit A Executive Summary

The Jackson/Teton County Housing Authority seeks \$7,000,000 in HUD PRO Housing funding assistance to leverage \$4,179,475 in local funds for the Teton County PRO Housing Action Plan. The Jackson/Teton County Housing Authority (JTCHA) is a joint powers board between the Town of Jackson and Teton County, Wyoming working to create and preserve affordable and workforce housing for the Jackson Hole region. JTCHA, in coordination with the joint Town of Jackson and Teton County Affordable Housing Department staff, develops housing through public-private partnerships, manages compliance for the deed-restricted housing stock, provides technical assistance for private developers, and runs programming to connect community members to employment and housing resources.

Teton County faces an extreme affordable housing crisis driven by land shortages, high building costs, wealth inequality, a historic preference for low-density development, a lack of state-led action planning, and technical knowledge barriers, burdening low- and moderate-income workers with high costs of living, long commutes, and housing instability. While Jackson and Teton County have taken actions to address the crisis, including passing pro-housing land use regulations, directly funding affordable housing construction, funding the conversion of market-rate homes to deed-restricted workforce housing, and forging employer housing partnerships, there remains a need for at least 2,000 affordable and workforce housing units in Teton County by 2027. This project will accelerate long-term and sustainable affordable housing production and preservation by catalyzing density increases in residential areas, boosting deed-restricted ADU construction, saving historic affordable homes from demolition and gentrification, and supporting affordable housing preservation by financing maintenance and upkeep costs.

## **1. Preservation of Historic Workforce Homes: \$2,050,000**

We will implement existing and expand incentives for pairing historic preservation and workforce housing preservation through a feasibility study, programmatic development, and direct promotion to potential participants.

*Barriers to Affordable Housing:* Gentrification of older neighborhoods through demolition of small, historic homes for development of large, new, high-end single-family homes leads to loss of existing/naturally occurring affordable housing, displacement of local workforce households, fragmentation of neighborhood character welcoming to lower-income families, and loss of structures with historic value.

*Project Activities:*

Feasibility Study:

- Analyze effectiveness of existing regulatory Historic Preservation incentives (Town Land Development Regulations) and the Housing Preservation Program (Housing Department Rules & Regulations)
- Create opportunity map of neighborhoods and individual homes that are of historic value and house local workers
- Analyze potential for additional incentives and project the scale at which these incentives are appealing and worthwhile to landowners in exchange for historic easement and workforce housing restrictions on the property
- Analyze financial feasibility and structure for program funding and transfer of development right (TDR) incentives, including fund type, TDR bank, and administration protocol.

Programmatic Development:

- Set up program fund and TDR bank
- Complete catalyst model via opportunity map engagement or direct purchase, preservation deed restriction, and sale of historic home housing local workforce.
- Target and market to homes identified in opportunity map for application to program

*Outputs and Outcomes:*

- Program Advancement: Establish scope and scale of incentives offered for program participation (monetary and non-monetary incentives)
- Program Mechanisms: Establish financial structures (fund type) and development right bank structure + administration system
- Opportunity Map: Target and market this program to homes identified in the Teton County opportunity map
- Sinking or Revolving Fund to support program
- TDR bank to support program

**2. ADU Pilot Program: \$2,150,000**

*Barriers to Affordable Housing:* The Town of Jackson zoning code permits by-right Accessory Dwelling Units (ADUs throughout, although Jackson zoning code uses ADUs, Accessory Residential Units) in nearly every zone as a density bonus to incentivize production of small affordable homes in complete neighborhoods. However, very high construction costs and the technical literacy required to navigate complex regulatory codes are barriers to production of ADUs, especially those that may increase affordability of existing single-family homes via receipt of supplemental rental income.

*Project Activities:*

- Contract local architect (\$150,000) to prepare complete construction plans for three ADU designs that meet Town of Jackson Land Use Regulations and Building Code
- Prepare user-friendly ADU guide as concierge service for landowners navigating the permitting and construction process + make ADU model construction sets available for local landowner use for free
- Establish pilot fund (\$2,000,000) to provide down-payment/construction grants to landowners in exchange for temporary or permanent deed restriction of the ADU for local workforce households

*Outputs and Outcomes:*

- Implementation of existing pro-housing zoning code allowing ADUs town-wide
- Removal of technical and financial barriers for landowners to build ADUs
- Increase in production of ADUs that serve as affordable workforce housing

**3. S4 Flats Development: \$1,000,000**

*Barriers to Affordable Housing:* Rapidly increasing local construction costs are stifling implementation of higher density transitional neighborhood zoning adopted in the Central Midtown subarea, specifically smaller-scale multi-unit complexes (8-15 units) that only require consolidation of 2-3 single-family lots. This is a barrier to incremental infill and redevelopment that supports missing middle housing options and greater affordability for prospective homeowners.

*Project Activities:* Gap funding to offset construction costs and buy down affordability of 13 new condo homes reserved for local workforce households. Preliminary construction estimates during project development were underestimated and have created a funding gap that must be filled to achieve the level of permanently deed-restricted Affordability needed.

*Outputs and Outcomes:*

- Implementation of existing pro-housing zoning code allowing higher density mixed home type neighborhoods
- 13 permanently deed restricted condos for ownership—8 with prescribed Affordability ranges and 5 reserved for local workers regardless of income amount.
- Catalyst/model project for neighborhood transition to medium density/missing middle land use pattern that is still aligned with Town character and integrates with the current single-family neighborhood
- \$1,000,000 is the entire remaining gap, otherwise funding stack is ready to go and development is shovel-ready

**4. Habitability Improvement/Long-term Maintenance Fund: \$1,800,000**

We are requesting seed funding for a no-interest micro-loan program to finance homeowner repairs and improvements necessary to maintain the health, safety and livability of existing deed restricted homes. This initiative includes retrofitting for accessibility improvements to increase disability-inclusive housing options.

*Barriers to Affordable Housing:* A barrier to preservation of existing affordable housing is the cost of habitability improvements necessary over time and regular upkeep/maintenance of homes. Deed restricted affordable homes in our program are capped at affordable prices, but homeowners are responsible for improvement and maintenance of each home and, as the housing stock ages, this work can be costly and decrease affordability for homeowners or result in substandard living conditions for residents. Additionally, many homes, even those built to current Building Code, lack physical elements necessary for someone with a disability and need improvements.

*Project Activities:*

- Set up a revolving loan fund, establish criteria and administrative procedures for distribution and repayment of no interest construction loans
- Seed this fund. This program will operate as a revolving fund with continued replenishment of the account with repayment from program participants so that this resource continues to be available for future participants.
- Limited to existing homes deed restricted as Affordable and administered by the Jackson/Teton County Housing Department. Open to both rentals and owner-occupied homes or HOAs for multiple units.

*Outputs and Outcomes:*

- Option for homeowners to pay for needed maintenance, repairs and accessibility improvements over time on a customized repayment plan without the addition of interest.
- Implementation of inclusive design elements for households with disabilities via no-interest micro-loans for retrofitting work.
- Physical upkeep and preservation of aging Affordable Workforce housing stock

**Exhibit B Threshold Requirements and Other Submission Requirements.** *Review and provide a narrative response, as necessary, to the Threshold Eligibility Requirements in Section III.D and Other Submission Requirements in Section IV.G*

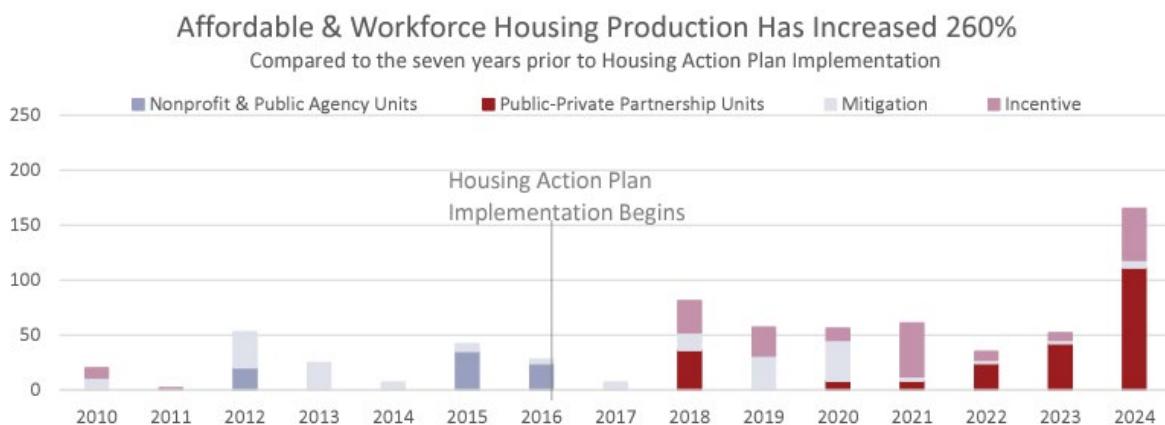
1. Resolution of Civil Rights Matters: The Jackson/Teton County Housing Authority does not have any of the charges, cause determinations, lawsuits, or letters of findings referenced in Section D.1 subparagraphs (1) – (5) of the PRO Housing NOFO filed against it at the time of this application submittal.
2. Timely Submission of Applications: This application is submitted October 15, 2024, prior to the application deadline of 11:59:59 PM Eastern time.
3. Eligible Applicant: The Jackson/Teton County Housing Authority is an eligible applicant as a Multijurisdictional Entity: an association of Town of Jackson and Teton County local governments in the form of an appointed joint powers board bound by a joint powers authority. The Housing Authority is authorized and has administrative capability to carry out the activities proposed in this application on behalf of its member jurisdiction(s). The Resolution creating and organizing the Housing Authority is attached to demonstrate partnership among all parties.
4. Number of Applications: The Jackson/Teton County Housing Authority is submitting one application in response to the 2024 PRO Housing NOFO. Any amendment or revision made to this application post-submittal will be submitted as an application in its entirety.

B.5 Physical Accessibility: All in-person meetings of the Housing Authority Board related to this grant application were held in a location physically accessible to persons with disabilities at the Jackson/Teton County Housing Department Office. All notices of and communications during all public meetings were provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities (remote zoom option with auto-generated subtitles, audio recording, and video).

6. Environmental Review: The recipient, its project partners, and their contractors will not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this NOFO, or commit or expend HUD or non-HUD funds for such activities under this NOFO, until the responsible entity has completed the environmental review procedures required by 24 CFR part 58 and the environmental certification and Request for Release of Funds (RROF) have been approved or HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the project.

## Exhibit C Need

1. Progress and Commitment: Jackson and Teton County have taken actions to address the affordable housing crisis, including passing pro-housing land use regulations, directly funding affordable housing construction, funding the conversion of market-rate homes to deed-restricted workforce housing, and forging employer housing partnerships. The 2012 Jackson/Teton County Comprehensive Plan set a 65% resident workforce goal for the community. The Comprehensive Plan directed staff and the elected officials to take “corrective actions” when the percentage of the workforce living locally dipped below 65%. After dipping as low as 58%, implementation of the 2015 [Housing Action Plan](#) has stabilized the resident workforce at 60%. The Workforce Housing Action Plan adopted in Jackson and Teton County identified new tactics and specific actions for addressing the decline in resident workforce. It also reorganized the way the Town and County participate in the creation of affordable workforce housing, focusing on a partnership model and creating the Jackson/Teton County Affordable Housing Department. Of the 66 action items listed in the plan, 65 are now complete or in process. Since the Town and County’s Housing Program shifted to a focus on Public-Private Partnerships and land development incentives were created to catalyze private sector development of permanently deed restricted homes for locals, Affordable and Workforce annual housing production has increased 260% compared to the seven years prior to Housing Action Plan implementation.



JTCHA defines “affordable” housing as units that serve households from 0% to 120% of the Median Family Income and do not exceed 30% of household income. “Workforce” homes are intended to serve households who earn more than 120% of the Median Family Income, but still cannot afford a market home due to Teton County’s extreme housing prices (see 2.2 Additional Context below). Thus, for the purposes of this application and the Teton County PRO Housing Action Plan, both “affordable” and “workforce” unit designations meet the definition of “affordable housing” under the FY24 Pathways to Removing Obstacles to Housing (PRO Housing) FOA.

**1.1 Improved Laws, Regulations, or Land Use Local Policies:** Both the Town of Jackson and Teton County have been proactive in amending their Land Development Regulations (LDRs) in recent years to boost the supply of affordable, higher-density, mixed-used, and transit-connected housing units:

**1.1.1 Accessory-Dwelling Units (ADUs):** In 2016, the Town of Jackson amended its Land Development Regulations to permit by-right Accessory Dwelling Units in nearly every zone as a density bonus to incentivize production of small affordable homes in complete neighborhoods (ordinance 1139). Previously, ADUs had been allowed in 12 of the 19 zones but were not permitted in residential zones because these zones were considered traditional, single-family neighborhoods. ADUs were not viewed as a compatible use in these neighborhoods because they would increase the intensity of use on individual sites, potentially disrupting neighborhood character, and due to concerns over transient renters, a lack of adequate parking space, and storage capacity difficulties.

However, demographic shifts and the accelerating affordable housing crisis in Teton County have sparked a growing acceptance and eagerness for ADUs. Residents have shown a demand for ADUs first by building them illegally, and secondly by seeking to have them legalized in the County in 2001. The County now allows ADUs in 12 out of 14 zones. Several of those zones are predominantly made up of traditional, single-family neighborhoods, the very neighborhoods that historically would have elected not to have ADUs. At the local level, a particularly important reason for this shift towards more acceptance of ADUs is the need to provide workforce housing in the community. The Jackson/Teton County Comprehensive Plan outlines a goal of housing 65% of the local workforce within Teton County. Since adopting the amendment, the Town has seen the creation of more new ADUs, helping to tackle the shortage of affordable housing, but not at a rate as significant as anticipated because of the cost and proficiency barriers outlined in this application.

**1.1.2 Historic Preservation Incentives:** In 2021, the Town of Jackson amended its Land Development Regulations (ordinance 1272) to introduce new regulations and incentives for the preservation of historic structures. The amendment reduces LDR requirements that inhibit the preservation and reuse of historic resources (such as floor area maximums, minimum lot sizes, and nonconforming structures) to incentive reinvestment in these properties. Historic structures play a key role in providing affordable housing options for the community. Development pressures, high costs, and previously burdensome regulations threatened the viability of preserving historic structures as affordable housing options, so this amendment has helped to reduce regulatory barriers and incentive reinvestment in these properties as affordable and workforce housing units. For example, because it was exempt from maximum density standards and maximum floor area allowance for the site, the Housing Department preserved a 1920s historic cabin on the site of a partnership development of 18 Affordable townhomes with Habitat for Humanity. This cabin has undergone structural preservation and is currently awaiting remodeling for use as a deed-restricted Affordable Workforce home.

**1.1.3 Density Increases and Bonuses:** In 2023, the Town of Jackson amended its Land Development Regulations (ordinance 1338) to allow up to 4 units of housing on a single lot within Neighborhood Low Density-5 zones if all units are deed restricted. And in 2024, the Town approved Ordinance P allowing fourth-story development on properties that are three or more acres in the Neighborhood High Density-1 zoning district for deed-restricted workforce, affordable or employee housing projects (expanding this tool from allowance in the CR-3 zone established in 2018). These density increases will help the community overcome land shortages and transportation challenges to build more affordable housing by opening up development of low-density, underutilized land into denser, transit-connected housing. Affordable and workforce housing provisions in the updated regulations will ensure that the housing increases spawned by these changes will meet the housing needs of low and moderate income earners. Passing Ordinance P was a key step in advancing the Virginian Property Project, which aims to convert a 5.15 acre former RV park in the Town of Jackson into at least 150 units of multifamily, deed-restricted workforce housing. JTCHA purchased the land for \$28,000,000 and released an RFP in 2023 for a multifamily developer to advance design and construction of the project, which will deliver critically needed deed-restricted workforce housing units.

1.1.4 Workforce Housing Floor Area Bonus: This update was adopted as part of the 2018 zoning update to the Town of Jackson Land Development Regulations. Known as the “2:1 bonus” or “fill-the-box tool,” its purpose is to encourage development of Affordable or Workforce housing units by allowing additional unrestricted floor area beyond the zone-based maximum Floor Area Ratio. This tool may be utilized in the CR-1, CR-2, CR-3, DC-1, DC-2, NH-1, NM-2, and OR Town zones. It allows a developer to expand floor area to the maximum that can be built within physical dimension zoning standards (height, setbacks, parking, etc.) instead of being capped at maximum Floor Area Ratio for the site. For a developer to use the tool, they must provide 1 square foot of deed restricted Workforce or Affordable housing for every 2 square feet of “bonus” unrestricted floor area.

1.2 Other Recent Actions: In addition to reducing regulations and introducing incentives for higher-density and affordable housing through land use changes, Jackson and Teton County continue to invest directly in the creation of more affordable housing.

1.2.1 Affordable and Workforce Housing Construction: To address the affordable housing production shortage, the Town of Jackson and Teton County through JTCHA have partnered with non-profit and private developers to build deed restricted affordable and workforce housing. To overcome high construction costs and the lack of adequate financial resources, the Town and County have directly funded the construction of new affordable housing units by appropriating Specific Purpose Excise Tax (SPET) funding for these projects. SPET is an additional penny of sales tax collected in Teton County that goes towards voter-approved projects. In partnership with Teton Habitat for Humanity, JTCHA has built 50 new homes with an additional 15 in development by providing over \$5,000,000 in funding for land purchases and horizontal infrastructure needs. All 65 of these units serve households earning less than 80% of the Median Family Income (MFI). JTCHA has also partnered with the Jackson Hole Community Housing Trust to build 96 homes by providing over \$16,000,000 in leveraged funds. Recently, JTCHA partnered with the Cumming Foundation and Community Foundation of Jackson Hole to create 57 deed-restricted rental homes, 15 of which are reserved for Teton County employees, at the Jackson Street Apartments Project. \$14,000,000 in public funds were provided for the project.

JTCHA also continues to work with private developers to fund the production of new affordable and workforce housing. The Kelly Place Condos project, completed in 2023, delivered 12 workforce ownership homes. The Town of Jackson provided \$1,700,000 in land for the project to private developers for the project. The Mercill Condos project, also completed in 2023, delivered 30 workforce ownerships units. Teton County provided the land for this development, valued at \$2,100,000. The County also paid to move the existing historic structures for the Jackson Hole Historical Society & Museum and to prepare the site for development at an additional cost of \$130,000. The County is also sub-leasing the commercial space in the development to two childcare providers, the Jackson Hole Children's Museum and Happy Kidz Daycare, to meet the critical need for affordable childcare. These investments demonstrate Jackson and Teton County's strong commitment to and experience in advancing affordable housing production.

**1.2.2 Market-Rate to Deed Restricted Conversions:** In addition to funding the construction of new affordable and workforce housing units, and to overcome the significant financial burden of funding new construction, JTCHA supports the conversion of existing market-rate units into deed-restricted housing. Through its Housing Preservation Program, JTCHA provides funding to permanently protect existing market homes for the local workforce. The Program provides funding for both ownership and rental units. For ownership, the program can provide up to \$200,000 in down payment assistance for households who work full time locally and earn at least 75% of their income locally to purchase a market (not deed restricted) home. In return for the financial assistance, the household is required to record a permanent Workforce Ownership deed restriction. For households who already own their own home and wish to permanently protect their home for the local workforce, the program can pay households up to \$200,000 to place a permanent Workforce Ownership restriction on the home. For rental units, the program can provide up to \$100,000 in down payment assistance for buyers (businesses, individuals, etc.) who seek to purchase a market unit and rent it to a member of the local workforce. These units may not be owner occupied. In return for the financial assistance, the buyer is required to record a permanent Workforce Rental deed restriction. The program will also pay up to \$100,000 to entities who already own a unit and wish to permanently protect the unit for the local workforce. These units must be rented to a member of the local workforce and may not be owner-occupied. The Housing Preservation Program has funded the conversion of four market rate units into deed-restricted workforce housing units, helping to meet the immense to house low- and moderate-income workers near employment opportunities.

1.2.3 Employer Housing Partnerships: Many employers in Jackson and Teton County informally or formally provide housing options as a benefit of employment. While the Housing Department's deed restrictions intentionally do not tie Affordable Workforce housing qualification to a specific employer, but our organization has facilitated purchase of "first rights" to rental or home ownership of deed restricted homes for interested community employers such as the local hospital (St. Johns Health), non-profits like Teton Literacy Center, local government entities (Town of Jackson, Teton County), and other local businesses. This structure helps to bring down the public subsidy required for new construction while offering local organizations a preference option for their employees.

2. Acute Needs: Teton County's affordable housing crisis, driven by land shortages, high building costs, wealth inequality, a historic preference for low-density development, a lack of state support, and technical knowledge barriers, burdens low- and moderate-income workers with high costs of living, long commutes, and housing instability. While the Town of Jackson, Teton County, and their partners have acted to address the crisis through land use regulation updates and capital investments, the severity of these challenges has created a significant affordable housing gap that cannot be filled with local resources alone.

2.1 Priority Geography: The project serves Teton County, WY. Teton County is a priority geography with an affordable housing need greater than the threshold calculations.

2.2 Additional Context: The Town of Jackson (population 10,698) is the economic and administrative heart of the Jackson Hole region and the seat of Teton County. Nearby Grand Teton and Yellowstone National Parks, the Bridger-Teton National Forest, and the Jackson Hole Mountain Resort bring millions of visitors to the region each year and drive the economic growth of the outdoor recreation and hospitality-focused local economy. These natural amenities also constrain available land in the region; over 97% of land is federally or state owned or managed, and the mountainous landscape further constrains development, leading to sky-high prices for the small pieces of land that are available to be developed. Most developable land is concentrated in the Town of Jackson, where housing, businesses, local government, and community organizations struggle to secure and afford adequate space. A historic preference for low-density building in the Town's downtown commercial core and single-family residential development in peripheral zones exacerbate the land shortage, and the community's remoteness, short construction seasons, and contractor shortage make construction extremely expensive. All together, these factors have fueled a growing housing affordability and availability crisis.

The influx of super-wealthy homebuyers seeking exclusive access to Jackson Hole's unparalleled natural amenities and to take advantage of Wyoming's lack of income tax and minimal property taxes has supercharged the crisis. Teton County ranks at or near the top of all counties in the country for wealth inequality. The average per-capita income in Teton County soared to \$318,297 in 2021; no other county in the country had an average per-capita income over \$200,000. In contrast, the median per-capita income was around \$60,000 reflecting the significant number of super wealthy earners in the county grossly skewing average incomes. These super wealthy buyers looking for second, third, and fourth homes continue to buy up scarcely available land and properties, driving up prices to unmatched levels. Housing in Teton County costs \$226 for every \$100 the average Wyoming resident pays, according to the latest figures from the Economic Analysis Division of the Wyoming Department of Administration and Information. In the second quarter of 2022, a two-bedroom unfurnished apartment in Teton County cost an average of \$2,782 a month; the majority of renters making their living in the region primarily need rentals priced between \$850 up to \$2,600 per month for a three-person household (2022 Teton Region Housing Needs Assessment). With rental vacancy rates in Teton County below 1%, there is not enough supply for new residents to find homes nor for existing residents to move into more suitable ones. And in 2024, the average single-family home sale price has reached \$7,000,000. With no state income tax or real estate transfer tax, this growth is going continue unabated for the foreseeable future, with few benefits redirected to the majority of Teton County residents. Instead, the low- and moderate-income earners who fill essential jobs and drive the growth of the tourism and hospitality sectors are burdened with high costs of living, long commutes, and instability.

The increase in home sale prices and rents in the region has been far outpacing the rise in wages for low- and moderate-income earners, making it very difficult for them to meet the costs of daily needs. Increasingly, these workers are being priced out of Jackson and Teton County altogether, forced to move to more affordable communities on the other side of Teton Pass in Idaho or further south into Lincoln County, WY. Because employment opportunities are concentrated in the Town of Jackson, workers must make the long commute from these bedroom communities into Jackson, burdening them with high transportation costs and creating traffic congestion due to the limited capacity of transportation infrastructure in this rural and mountainous region. The 2022 Housing Needs Assessment found that it costs an average of \$500 per month to commute from Teton County, Idaho, and \$850 to commute from N. Lincoln County to Teton County, Wyoming, for work. For those who do try to stay in the region, rapidly growing prices and the destruction of once affordable housing units create significant housing instability. When renters were asked if they had been forced to move in the past three years, nearly half (46%) said yes, and many more than once. The housing and commuting burden on workers is also impacting businesses. The Housing Needs Assessment included an employer survey which found that 91% of responding businesses dealt with staffing shortages and 64% experienced employee burnout and dissatisfaction.

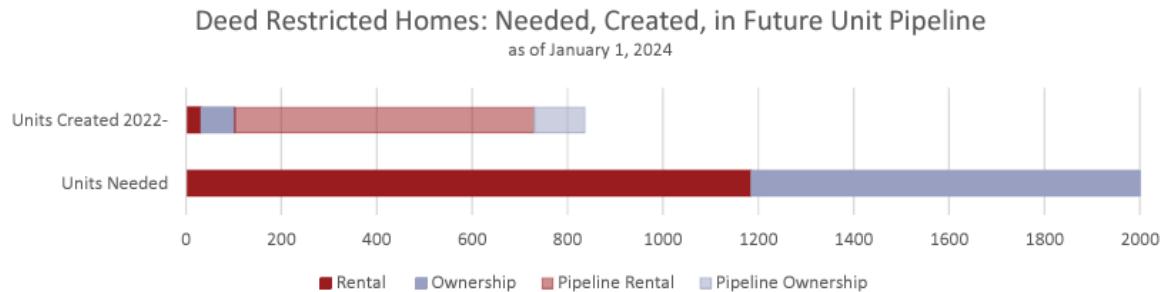
According to the Housing Needs Assessment, there is a need for about 5,300 housing units in the Teton Region to address the following components of demand through 2027:

Increase the rental supply to a functional level (i.e., 5% vacancy rate) and house persons who are living in their car, hotels, couch surfing, etc. (i.e., currently unhoused)

Keep up with job growth (ranging from 2.4% in Teton County, Wyoming, up to 4.8% per year in Teton County, Idaho), which includes filling the 15% to 19% of unfilled jobs.

Replace employees as they retire (between 10% to 15% in the Region over next 5 years).

Just in Teton County, at least 2,000 homes priced below market value are needed by 2027. While Jackson and Teton County have acted to increase affordable housing production by removing regulatory barriers and investing in housing construction and conversion projects, more investment is needed to combat market pressures, the lack of state-led housing action planning, and the following remaining barriers.



**3. Remaining Barriers:** Rising construction costs stifling catalyst projects, knowledge and technical barriers to implementing ADUs, gentrification and the loss of historic affordable housing, and cost burdens to maintain existing affordable housing are remaining barriers that hinder the impact of regulatory action and capital investments in boosting affordable housing production and preservation.

**3.1 Funding Gaps for Catalyst Projects:** Higher-density neighborhood projects are now permitted thanks to recent zoning updates and are needed to serve as transitional density increases in the Town of Jackson, but rapidly increasing local construction costs are stifling implementation of planned developments. More specifically, there is a need for catalyst projects in residential neighborhoods which model how modest density increases can remain compatible with the Town's historic character and positively contribute to neighborhood vitality. As detailed above, the Town of Jackson recently updated its Land Use Regulations to allow for more density in residential zones provided the new developments provide affordable and workforce housing. Zoning adopted in the Central Midtown subarea allows for smaller-scale multi-unit complexes (8-15 units) that only require consolidation of 2-3 single-family lots. These smaller-scale multi-unit complexes in transitional neighborhoods are a critical focus of JTCHA, as these public-private projects serve as models and catalysts for neighborhood transitions from single-family development to medium density developments that target "missing middle" housing needs. However, escalating construction costs remain a barrier to these projects. Delays in securing the full funding stack have led to cost inflations, putting otherwise shovel-ready projects further out of reach. While the Town of Jackson and Teton County have successfully leveraged funding to support private and non-profit developers in creating new affordable housing through several projects over recent years (see 1.2.1 Affordable and Workforce Housing Construction above), there remains a need for capital funding to jumpstart planned but not fully funded catalyst projects to accelerate reasonable density increases.

3.2 Technical and Financial Gaps for ADUs: A recent Town of Jackson zoning update permits by-right ADUs in nearly every zone as a density bonus to incentivize production of small affordable homes in complete neighborhoods. However, very high construction costs and the technical literacy required to navigate complex regulatory codes are barriers to production of ADUs, especially those that may increase affordability of existing single-family homes via supplemental rental income and meet the need for workforce housing. While the regulatory change was a necessary first step, property owners need detailed planning guidance to navigate the permitting and construction process and financing support to get ADU projects funded and constructed.

3.3 Destruction of Historic Affordable Housing: Gentrification of older neighborhoods through demolition of small, historic homes for development of large, new, high-end single-family homes leads to loss of existing affordable housing, displacement of local workforce households, and fragmentation of neighborhood character welcoming to lower-income families. As detailed above, the Town of Jackson recently passed a Land Use Regulation ordinance that reduces the regulatory burden on historic properties to incentive their preservation and reuse as affordable housing, but market pressures from wealthy homebuyers to demolish these structures for new luxury homes remains strong. Leveraging the zoning update and JTCHA's experience through the Housing Preservation Program, more funding is needed for historic preservation easements and housing deed restrictions to save these properties from destruction.

3.4 Upkeep to Maintain Existing Affordable Housing: The costs of habitability improvements and regular upkeep and maintenance of homes are a barrier to the preservation of existing affordable housing. Deed restricted affordable homes managed by JTCHA are capped at affordable prices, but homeowners are responsible for improvement and maintenance of each home and, as the housing stock ages, this work can be costly and decrease affordability for homeowners or result in substandard living conditions for residents. Low/no interest construction loans for general home maintenance and small grants for emergency health and safety repairs can help to preserve existing affordable housing, but funding these programs is an ongoing challenge.

## **Exhibit D Soundness of Approach**

### **1. Vision**

#### **1.1 Proposed Activities and Addressing Key Barriers**

**1.1.1 Construction Gap Financing for S4 Flats:** JTCHA will use project funds to close the funding gap on a new affordable, multifamily housing project in the Town of Jackson. The S4 Flats development will bring 13 new units of housing to a residential block in West Jackson, a high opportunity area for greater residential density. Eight of these homes will be affordable ownership and five of these homes will be workforce rental, and the Town of Jackson has secured eight employee rights of first purchase in the development. The Town of Jackson is providing the land (910 Smith Lane and 915 Simon Lane) and an additional \$363,200 in funding for the development for a total public investment of \$2,763,200.

In addition to directly meeting the need for affordable and workforce restricted housing units in Teton County, the project will also address the funding gap barrier that has slowed infill development in the Town of Jackson's residential areas. While the Town of Jackson has taken action to promote sensible density increases by updating its Land Use Regulations, catalytic projects like the S4 Flats project are needed to jumpstart the transition of single-family residential neighborhoods to denser, multifamily, and mixed-use development patterns by showing how modest density increases can remain compatible with the Town's historic character and positively contribute to neighborhood vitality. S4 Flats will also model innovative design choices for future developments to follow. Covered and stacked parking will allow for more residential space, and this modular development will bring these units to market quicker than other developments.

S4 Flats is shovel ready; the building permit has been secured and full construction documents have been completed. With \$1,000,000 in HUD PRO Housing funding assistance, the development will be fully financed and ready for construction, with a projected completion date of Quarter 1 of 2026. The remaining \$1,000,000 funding gap highlights the immense challenges JTCHA faces in delivering new affordable housing. Despite the \$2,700,632 in public funding committed to the project in addition to \$589,503 in developer equity, final construction costs came in \$1,000,000 higher than initially projected. HUD PRO Housing funds will close the funding gap to start construction and deliver 12 units of deed-restricted affordable and workforce housing for Teton County. The S4 Flats project meets CDBG National Objective 1. Benefiting low- and moderate-income persons, by delivering affordable and workforce restricted housing units that will serve households who earn between 0 - 120% of the Median Family Income as required by JTCHA. JTCHA verifies and manages compliance with these income restrictions to ensure that units serve low-and moderate-income earners long-term. Financing the construction of affordable housing units constitutes an eligible activity consistent with Sections III.F.1 & 2 of the NOFO, “Financing the construction or rehabilitation of affordable housing.”

1.1.2 ADU Pilot Program: JTCHA will address the technical and financial barriers inhibiting ADU construction by starting an ADU Pilot Program that includes a user-friendly ADU guide as concierge service for landowners navigating the permitting and construction process, contracting with a local architect to prepare complete construction plans for three ADU designs that meet Town of Jackson Land Use Regulations and Building Code requirements for landowner use, and starting an ADU construction financing fund providing down-payment/construction grants to landowners in exchange for temporary or permanent deed restriction of the ADU for local workforce households. While recent zoning updates have significantly expanded available land for ADU development, a lack of technical knowledge and financing resources among landowners has prohibited them from constructing ADUs at a level needed to meaningfully add affordable housing units to Teton County. JTCHA will develop a user-friendly ADU guide which will lead landowners step-by-step through the permitting and construction processes from permit preparation to review fees and inspection schedules. JTCHA will also contract with a local architect to prepare full construction documents for three unique ADU designs to provide to landowners free of charge, reducing both their construction costs and speeding up the construction pipeline. Each ADU construction plan will conform to Land Use Regulations to further speed up the approval process, and mitigate potential concerns about the cohesiveness of ADUs with neighborhood and town character. Lastly, JTCHA will use HUD PRO Housing funds to start a construction financing fund for ADUs, which will provide down-payment/construction grants to landowners in exchange for temporary or permanent deed restriction of the ADU for local workforce households that meet current Housing Department qualification standards (employment status and local income earners). The ADU Pilot Program will boost the construction of ADUs in Teton County to meet the need for 2,000 units of affordable and workforce housing, meeting CDBG National Objective 1. Benefiting low- and moderate-income persons, by delivering affordable and workforce restricted housing units that support naturally occurring affordability (on average ~20% less than market rentals) and are managed by the Housing Department to provide long-term housing to qualifying workforce households, not short-term renters or lodging. Creating an ADU User Guide constitutes an eligible activity consistent with Sections III.F.1 & 2 of the NOFO by “creating affordable housing planning resources for member jurisdictions”. Creating pre-approved ADU plans constitutes an eligible activity consistent with Sections III.F.1 & 2 of the NOFO by “Establishing incentive programs, designing pre-approved floorplans, or introducing more flexible zoning to enable and promote accessory dwelling units.” The ADU construction financing fund constitutes an eligible activity consistent with Sections III.F.1 & 2 of the NOFO by “financing the construction or rehabilitation of affordable housing.” JTCHA will run the ADU Pilot Program for the full six years of the project period and beyond and projects to start delivering benefits within the first project year.

1.1.3 Historic Home Preservation Program: The new Historic Home Preservation Program will include a feasibility study and pilot fund to identify historic properties and place easements and deed-restrictions to permanently protect historic housing for workforce housing. The new program builds upon historic property zoning incentives and protections for historic properties and JTCHA's experience with the Housing Preservation Program to save historic homes from destruction and gentrification to instead preserve them for affordable and workforce housing, addressing this growing barrier to affordable housing. The Preservation Program addresses the key barrier to preserving historic housing – market pressure – by proactively identifying and registering potential properties for historic designation to prevent their demolition, and funding easements and deed-restrictions to preserve these assets for affordable and workforce housing. The feasibility study will explore the potential of Transferable Development Rights (TDR), include an opportunity map which identifies potential properties for historic designation and future protection, and evaluate whether a revolving loan fund or sinking fund is the better financing model for the preservation pilot fund. The pilot fund will be used to purchase historic homes, place historic preservation easements, and place housing deed restrictions to permanently protect units for workforce housing. Both components of the Historic Home Preservation Program meet CDBG National Objective 1. Benefiting low- and moderate-income persons, by promoting the protection of historic housing properties for protection against demolition and gentrification to instead serve as naturally occurring and deed-restricted affordable and workforce housing units serving primarily serving households who earn between 0 - 120% of the Median Family Income as required by JTCHA. Both components constitute eligible activities consistent with Sections III.F.1 & 2 of the NOFO "Acquisition or subsidization of at-risk housing for the purpose of preserving affordability." JTCHA will run the Historic Home Preservation Program for the full six years of the project period and beyond and projects to start delivering benefits within the first project year.

1.1.4 Habitability Improvement and Maintenance Fund: JTCHA will establish a new Habitability Improvement and Maintenance Fund which will distribute low/no interest construction loans for general home maintenance and small grants for emergency health and safety repairs to owners or HOAs of permanently deed restricted affordable homes. The Fund will help preserve existing affordable housing by addressing the high costs of upkeep and maintenance that decrease affordability for low-and moderate-income residents of affordable and workforce housing and can result in substandard living conditions. Keeping these residents in their homes will curb the intense market pressures that can rapidly drive-up homes prices and result in the neighborhood-wide destruction of affordability. The Fund meets CDBG National Objective 1. Benefiting low- and moderate-income persons, by providing financial assistance to low-and moderate-income residents of deed-restricted affordable and workforce housing units to mitigate displacement. Only residents of deed-restricted affordable and workforce housing will be able to apply for financial assistance and only for projects meeting the criteria developed as part of this proposal – direct health and safety repairs, necessary maintenance to support continued long-term livability, and accessibility improvements to aid households with disability. The Fund constitutes an eligible activity consistent with Sections III.F.1 & 2 of the NOFO, “Establishing loan or grant programs with affordability requirements or other mechanisms for rehabilitation of existing affordable housing units.” JTCHA will run the Habitability Improvement and Maintenance Fund for the full six years of the project period and beyond and projects to start delivering benefits within the first project year.

1.2 Lessons Learned: Each of the four components of the project are modeled after successful efforts that have boosted the supply of affordable and workforce housing in Teton County and around the country.

1.2.1 Capital Construction: The S4 Flats Development project is modeled after several public-private multifamily development projects that JTCHA has delivered in recent years, including:

Jackson Street Apartments: 57 deed-restricted rental homes completed in August 2024, leveraging \$14,000,000 in public funding, \$29,000,000 in foundational funding, and \$14,000,000 in developer funding. The projected has brought increased density near the downtown core of Jackson and houses 170 people at a median family income of \$79,994 year (less than 80% of median family income). Over 50 local employers have at least one employee living at the development. This development is a huge success, and has become an important model for our community and the power of partnership impact funding structures.

Mercill Condos: 30 Workforce condominiums completed in March 2023, leveraging \$2,230,000 in public funding and \$1,200,000 in developer equity. Of the 30 homes created, 18 are workforce ownership (owners qualify for the Workforce Program and live in the homes) and 12 of the homes were purchased by employers who are renting the unit to local workers and their families. Over 30 local employers have at least one employee living at the development. This development is a prime model for the co-benefits of mixed use redevelopment and infill in the downtown core area by incorporating an entire street-level floor of childcare, a service desperately needed by local working families.

1.2.2 ADU Pilot Program: JTCHA's ADU Pilot Program follows a similar and successful model deployed by the Denver Housing Authority to boost ADU construction. Through the [West Denver Single Family Plus \(WDSF+\) ADU Pilot Program](#) started in 2019, low and moderate income homeowners have received planning and implementation support to make ADU development more accessible and affordable, combatting the affordable housing crisis and providing wealth-building opportunities to disadvantaged residents. Through the Pilot Program, the project team first published the WDSF+ ADU Handbook: A Guide to Detached ADU & Tandem House Development to help educate west Denver homeowners about the benefits and requirements of developing an ADU. Next, architects from Habitat for Humanity and a local chapter of the American Institute of Architects designed six ADU models for participant use with the City development review team to ensure the ADUs are meeting building code and to help expedite the development process for subsequent sites. Program submittals using an ADU model with no changes require only zoning and site plan reviews, which can help to expedite permitting. After those initial planning steps, the project team opening up a development financing for ADU construction, with the requirement that any ADU constructed through the program remain affordably restricted at or less than 80% AMI for 25 years, with a prohibition on short-term rentals. The program has proven successful and popular year after year; in 2023 up to 6,000 homeowners benefited from a new online ADU zoning look-up app, 191 received ADU feasibility evaluations for zoning and financing, 54 received one-on-one ADU development technical assistance from the team, 31 were referred to a lender, 12 had in-depth ADU site analysis visits, and 9 homeowners moved into pre-development, design or permitting for an affordable ADU. Lessons learned from the Denver ADU program relevant to Teton County include:

Outreach and education are major needs due to broad unfamiliarity with ADUs, City standards, financing, and the general development process.

Predesigned and approved ADU models save homeowners time and money and help participants visualize an ADU in their backyard.

Site variables add significant costs to the ADU construction budget, creating the need for a thorough review of site conditions, utilities, and infrastructure before determining the total costs of development and loan financing.

The deed restriction and accompanying promissory note that restricts ADUs as affordable for 25 years provide a balanced trade-off for lower-cost ADUs, program subsidies, and WDRC development services.

A pilot program inherently includes learning and time to figure out new strategies and solutions.

JTCHA will take these lessons learned and ongoing challenges into account with the rollout of its ADU Pilot Program by focusing on robust education and outreach with its ADU user guide, including bilingual outreach efforts, to overcome the challenge of unfamiliarity with ADUs, City standards, financing, and the general development process. JTCHA has also refined its ADU Pilot Program to include pre-designed ADU models based on the success of ADU models in the Denver Program in reducing costs and time.

**1.2.3 Historic Home Preservation Program:** The Historic Home Preservation Program is modelled after JTCHA's existing Home Preservation Program, which has been successful in converting market-rate housing into permanent affordable housing. With high down payment requirements for home purchases and ever-increasing costs of maintaining a home (rising taxes, maintenance, and HOA obligations), this program offers significant financial stipend in exchange for permanent deed restriction—effectively allowing us to buy permanent protection of these homes without any construction cost.

**1.2.4 Habitability Improvement and Maintenance Fund:** This program proposal was prompted by our work with The Kelsey (an inclusive housing non-profit operating nation-wide) on disability-inclusive housing scarcity and from interaction with current residents of deed restricted homes facing challenges in paying for home repairs that exceed affordability standards. It is clear that these people need support with things like leaky roofs, grab bar installation and sidewalk resurfacing for better access, as resident needs change--many community members aging in place, temporary or chronic injuries, and aging housing stock.

1.3 Complementing Existing Plans: Teton County faces a unique set of challenges including rising wealth inequality, the affordable housing crisis, development and displacement pressures from tourism and hospitality, worsening traffic congestion, and high susceptibility to environmental hazards worsened by climate change. A comprehensive plan update, regional transportation plan, and an employee generation study were recently completed to chart a collaborative and cohesive regional approach to tackle these issues. As housing is at the nexus of all these challenges, the Teton County Affordable Workforce Housing Production and Preservation Project was developed with careful consideration of how it advances the goals and strategies of these regional plans.

1.3.1 [2020 Jackson/Teton County Comprehensive Plan](#): The updated Comprehensive Plan has three adopted common values: ecosystem stewardship, growth management, and quality of life. To advance these values, the Comprehensive Plan lays out a strategy to preserve and protecting habitat, habitat connections, scenery, and open space by directing growth out of rural areas and minimizing impact from the growth that does occur (ecosystem stewardship); direct growth out of rural areas and into “Complete Neighborhoods” of existing development, infrastructure, and services to enhance the most appropriate places for growth into the best places to live, work, and play (growth management); and prioritize growth that provides housing and services that residents can access and afford (quality of life).

The Teton County Affordable Workforce Housing Production and Preservation Project is strongly aligned with all three of the common values and will advance the following goals and strategies of the Comprehensive Plan:

Principle 3.2 – Enhance suitable locations as Complete Neighborhoods - Development, infill and redevelopment should be located primarily in areas of existing infrastructure and services to enhance such suitable areas as Complete Neighborhoods – The Project invests in the creation of denser, multifamily housing in low-density areas of existing infrastructure.

Principle 4.2—Promote vibrant, walkable mixed use areas – The Project invests in the creation of housing near employment centers and multimodal transportation options in Jackson rather than peripheral areas.

Principle 4.5—Preserve historic structures and sites – The Project includes a historic preservation fund which will leverage recent zoning incentives to preserve historic structures as affordable and workforce housing.

Principle 5.1—Maintain a diverse population by providing workforce housing – The Project directs a significant portion of the budget towards deed-restricted workforce housing units.

Principle 5.4—Use a balanced set of tools to meet our housing goal – The Project includes both market-based tools (providing funding directly for capital construction in partnership with developers) and restriction based solutions (deed-restrictions and income limits).

1.3.2 [2020 Jackson/Teton Integrated Transportation Plan](#): The Integrated Transportation Plan (ITP) sets policies and recommendations with the goal of making travel by walking, biking, carpool, or transit more convenient than travel by single-occupancy vehicle. Locating new housing near employment centers and everyday destinations will be a key component of this effort. Strategies and investment priorities of the ITP that this project will advance include:

Continue to streamline the town circulator route and increase service levels: Jackson and Teton County jointly run the [START Bus Transit Program](#), which provides bus service within the Town of Jackson and to commuter destinations throughout the region. JTCHA continues to prioritize investment into housing project near START Bus Stops to encourage ridership over personal vehicle trips, and will continue to do so through this project. Recent zoning updates include some requirements about locating new multifamily housing projects near transit stops, and JTCHA will explore opportunities to invest project funds into the creation and preservation of affordable housing units near START bus stops to promote transit-oriented development. The S4 Flats Development is a strong example of this priority – the new development is located two blocks away from a START bus stop.

Invest in walking trails and pathways: The regional [Pathways trail system](#) provides 70+ miles of paved walking and biking pathways within the Town of Jackson and among recreation destinations, including Teton Village and Grand Teton National Park. The Pathways system provides safe and accessible transportation for shorter trips within the Town of Jackson and locating new housing along the Pathways network will help reduce reliance on personal vehicles. JTCHA will prioritize housing investment opportunities that leverage this network.

Establish a Transportation Demand Management (TDM) Program and incorporate TDM in new development decisions: Teton County is looking to implement TDM to reduce traffic congestion and more efficiently and sustainably connect workers between housing and employment centers. By focusing investment on creating workforce-restricted housing units in the Town of Jackson near employment opportunities, this project will complement this strategy to improve the transportation network by reducing commuter travel and its negative impact on traffic congestion.

### 1.3.3 [2022 Commercial and Residential Employee Generation and Affordable Housing Nexus Study](#)

[Study](#): The Nexus Study documents current links between the construction of new commercial and residential development, the employees generated or induced by the development, and those employees' need for housing. In addition, the Nexus Study calculates a set of maximum commercial and residential linkage fees based on the number of new employee households generated by new development and the subsidies required to provide housing at affordable levels and serves as a quantitative rationale for the mitigation fees that Jackson and Teton County charge. The Town and County currently have a housing mitigation program, a land use tool that requires new residential and nonresidential development to provide affordable housing onsite to mitigate the impacts of the new development. In the case of an existing land use changing to a higher impact land use (greater need for workers), the difference must be mitigated by (in order of preference):

Building units onsite (preferred) or offsite

Conveying of land

Utilizing banked unit(s)

Deed restricting or acquiring units

Paying mitigation fees

Mitigation fees are a crucial source of funding for JTCHA as it works to develop and preserve affordable and workforce housing, and this study provides a reliable forecast of how future mitigation fee revenues can sustain JTCHA's efforts despite funding challenges (see 1.5 Roadblocks to Implementation below).

1.4 Environmental Risk Mitigation: Teton County's top environmental risks are wildfires and flooding. To mitigate potential wildfire impacts on development, the Town and County prioritize development in existing urban areas and outside of the wildland-urban interface. JTCHA will continue to follow this approach as it promotes both resiliency against wildfire threats and is aligned with the infill development and "Complete Neighborhoods" priorities of the Town and County. Similarly, the Town and County take care to avoid developments on land with significant flood risks. Teton County is subject to flooding concerns due to the Snake River, but the Town of Jackson is largely outside of any areas of heightened flood risk as determined by FEMA. In general, locating new and preserving existing aff workforce housing in walkable complete neighborhoods helps reduce overall GHG - data shows surface travel as biggest contributor in Teton County which is not decreased by increasing commuter patterns from neighboring counties and towns: [https://public.tableau.com/views/IndicatorDashboardFull/CV1GHG?:language=en-US&:embed=y&:sid=&:redirect=auth&:embed\\_code\\_version=3&:loadOrderID=0&:display\\_count=y&:origin=viz\\_share\\_link](https://public.tableau.com/views/IndicatorDashboardFull/CV1GHG?:language=en-US&:embed=y&:sid=&:redirect=auth&:embed_code_version=3&:loadOrderID=0&:display_count=y&:origin=viz_share_link)

1.5 Roadblocks to Implementation: Funding shortages to sustain these grant-funded activities are the largest potential barriers to sustained affordable housing production and preservation. To address the public funding shortfall barrier, JTCHA is working to secure dedicated funding for future public-private developments, the ADU construction financing fund, the Historic home preservation program pilot fund, and the Habitability improvement and maintenance fund to sustain these activities after PRO Housing grant funds have been expended and without the need to rely on further grant funding. As detailed above, while public financial resources are limited, JTCHA can direct Specific Purpose Excise Tax (SPET) funding for PRO Housing project activities by securing an appropriation of these funds generated from the \$.01 sales tax. HUD PRO Housing grant funds will jumpstart these programs to demonstrate their viability, which will give JTCHA greater leverage in securing an apportionment of SPET funds to sustain these activities. In FY24, JTCHA had an allocation of \$3,200,000 in SPET funding to support its housing production and preservation efforts. JTCHA will also continue to leverage workforce housing mitigation fees (which generated \$1,500,000 in FY24), General Fund contributions from the Town of Jackson and Teton County, tax-exempt bond financing, and philanthropic contributions from community partners to sustain PRO Housing activities in the long-run, mitigating the significant barrier that funding shortfalls could pose to delivering sustained affordable housing production and preservation.

2. Geographic Scope and High Opportunity Areas: The project geography is Teton County, with activities focused in the Town of Jackson, and marginal impacts to Teton County, Idaho and Lincoln County, Wyoming due to the commuting relationship among these counties. As detailed above, Jackson is the housing, employment, and hospitality center of the region. The housing crisis is most concentrated in Jackson, where land is developable and employment opportunities are provided at businesses and local government, but high construction costs, intense market pressure, and low-density development have created a severe affordable housing shortage. With recent updates to zoning codes, there is an opportunity to meaningfully address the housing crisis through infill development projects that bring higher-density multifamily developments to predominantly single-family residential districts, but funding, technical knowledge, and market pressures remain as barriers to affordable housing production and preservation. This project will build long-term systems and capacity to overcome these barriers and preserve and create housing in the following high-opportunity areas, characterized by their connections to everyday destinations, employment opportunities, transit infrastructure, and high potential for mixed-use and higher-density infill development:

2.1 Town Residential Core: Town Residential Core is comprised of a variety of housing types and forms including single family, duplex, tri-plex and multi-family occupied primarily by the local workforce. Some of the districts key strengths are its proximity to the Commercial Core with employment and complete neighborhood amenities, its existing gridded transportation network and a mix of low to high density residential development. The district is in need of redevelopment and reinvestment in order to ensure it is a highly desirable residential neighborhood with a strong sense of ownership in the future.

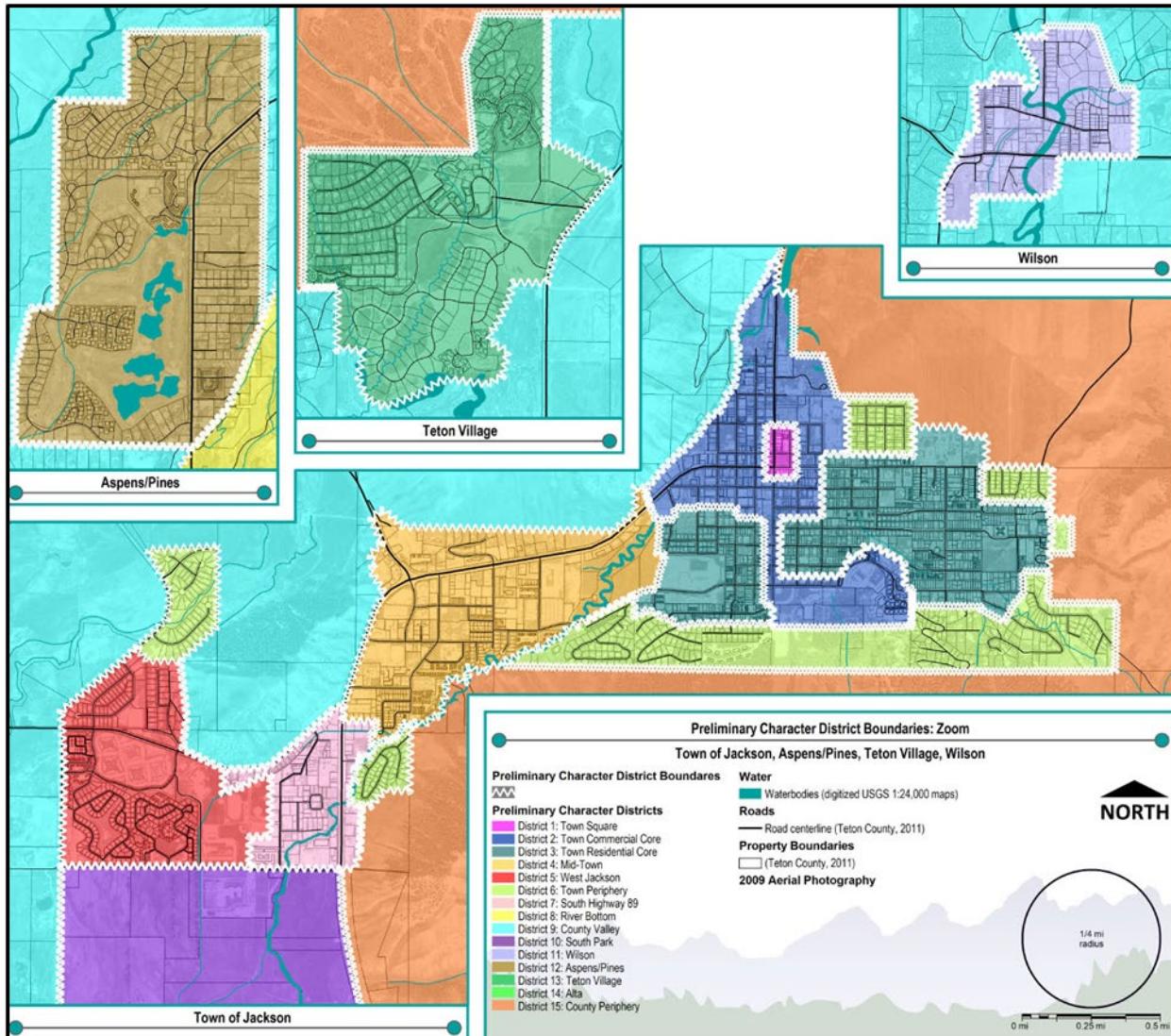
In the future, a variety of low to high residential densities, a variety of residential types including single family, duplex, tri-plex and multi-family and variety of building sizes will be encouraged in order to maintain and meet community workforce housing goals. The community strongly discourages the consolidation of multiple lots to create larger single-family home sites, as they are not consistent with community character and inconsistent with growth management goals. An important goal of the community will be to reestablish a more neighborhood feel with a strong sense of ownership by all residents. The existing gridded transportation system, including areas with and without alleys, provides great connectivity for all modes and should be maintained and enhanced whenever possible. Complete street amenities are appropriate and should be added with every opportunity in keeping with the existing residential character including continued and expanded START service. It is also important to recognize Snow King Avenue as a primary transportation corridor that will need to be maintained and improved in order to support regional transportation goals. The district is well served by a majority of Complete Neighborhood amenities that should be maintained and enhanced in the future. Some limited local convenience commercial and mixed-use office development exists and will continue in the future in order to achieve the complete neighborhood and economic sustainability goals of the plan.

2.2 Mid-Town: Midtown is one of the most complete neighborhoods in the community. It contains many of the service, office, and retail establishments that meet Teton County resident's daily needs. It also contains a significant amount of workforce housing in a variety of housing types including single family, duplex and multi-family structures. Another important characteristic of the district is the "Y," the intersection of the community's two main highways, U.S. 89 and Wyoming 22. Midtown is a highly visible District that is experienced on a daily basis by most residents. It is also the location of a significant amount of existing lodging facilities. Today, the land use pattern is automobile oriented, made up of large blocks containing low intensity single use structures (both residential or non-residential uses) surrounded by significant surface parking, with little connectivity between blocks and lots. Flat Creek also is a prominent feature in this district.

The future vision for the district is to create a walkable mixed-use local's downtown with improved connectivity and an increase in residential population. Key to achieving this vision will be the creation of a concentrated and connected land use pattern that continues to meet the daily needs of the local community and provide workforce housing. It is also important to recognize Snow King Avenue as a primary transportation corridor that will need to be maintained and improved in order to support regional transportation goals. Whether it is enhancing the gateway to Town at the Y intersection, redeveloping under- utilized properties with mixed use structures, or improving alternative transportation infrastructure and connectivity throughout the district, the community believes that change in this district is desirable.

2.3 West Jackson: West Jackson is one of the most complete neighborhoods within the community with its most significant characteristic being its wide variety of land uses. This diverse district is highly automobile oriented and contains a variety of non-residential uses, a variety of residential types and sizes, light industrial, and the majority of the community's public schools. It also contains a large undeveloped agricultural area south of High School Road, while Flat Creek also serves as a prominent natural feature throughout the district.

The future goal of the district will be to take advantage of the existing variety of land uses and complete neighborhood amenities and to develop them into a more attractive and well connected district. The continuation of light industrial uses is necessary to support the local economy. The preservation of existing stable residential areas provides a significant amount of workforce housing, which will be essential in meeting the growth management and workforce housing goals of the community. Enhancement of the southern gateway into Town into a mixed use corridor with improved connectivity and visual appearance will also be important. A key challenge of the district will be to address transportation congestion, safety, and connectivity issues.



### 3. Stakeholder Engagement

**3.1 Key Stakeholders:** Describe your key stakeholders and how you conducted outreach in developing this proposal, including how you built support and engaged community members most likely to benefit from your proposed activity. Please also describe your strategy for continued outreach during the grant's period of performance.

The programs and work components are expansions of existing programs or previously identified areas of need based on lessons learned and evaluation exercises conducted by the Housing Department and Housing Authority. Key stakeholders are continuously integrated in our processes.

### 3.1.1 Low- and Moderate-Income Community Members

Our online Interest form currently has active housing searches from over 2,000 local households. When filling out the interest form, we ask specific questions to gather data on need on which to design programmatic activity and direct investments. All Housing Department programs target low and moderate-income community members as our sole customer base for which we work.

**3.1.2 Non-profit Partners:** The Housing Department is a member of the Housing Action Collective hosted by the Community Foundation of Jackson Hole. This grant proposal is informed by recently completed collective action work with all Jackson/Teton County non-profits working in the housing sphere. Non-profit entities also often are our development partners in construction of new housing.

**3.1.3 Private Developers:** In our housing partnership model, we often leverage the capital and construction experience of private developers. Private developers that we have worked with express mutual benefits of the partnership model and also have informed gaps in our programs on which this application is based, specifically the rapid changes in market construction costs for S4 Flats and the lack of ADUs as incremental housing supply building.

**3.1.4 Community Organizations:** The Housing Department is a member of the Housing Action Collective hosted by the Community Foundation of Jackson Hole. This grant proposal is informed by recently completed collective action work with all Jackson/Teton County community organizations working in the housing sphere.

**3.2 Soliciting Input:** Describe the specific actions you have taken to solicit input from and collaborate with stakeholders in developing this application, including how input from stakeholders and community members has shaped your proposal. In particular, describe input from the housing industry in your area, including affordable housing developers, builders/general contractors, and unions as well as persons in need of affordable housing

Continuous and regular two-way collaboration with community partners allowed seamless integration of previously identified barriers and solutions as collective action work described in this proposal.

**3.3 Incorporating Input:** Describe how you incorporated input from stakeholders into your proposal.

Input was directly incorporated in the design of these programmatic proposals from continuous shared feedback and priorities defined collaboratively in the 2015 Housing Action Plan and annual Housing Supply Plans.

#### 4. Affirmatively Further Fair Housing

Describe your plans to remove barriers to the development of affordable housing in well-resourced areas of opportunity. How will your proposal increase access for underserved groups to these areas? What is the racial composition of the persons or households who are expected to benefit from your proposed grant activities?

Focusing work in existing neighborhoods that have been identified by our Community's Comprehensive Plan as "transitional" ensures multi-modal proximity to services and amenities in well-resources areas of opportunity. With the historically largest measurable income disparity nation-wide, people of low and moderate income are underserved in housing and the identified beneficiaries of all Housing Department programs. Although Teton County is majority white, up to 25% of our local population is estimated to identify as Latine. Immigrant communities and those without English proficiency are especially marginalized from informal housing opportunity through social and professional networks. With a multi-lingual application specialist staff member and work with local non-profit Voices JH we have implemented interventions that provide accessibility to these often marginalized populations.

Describe your plans to remove barriers impeding the development of affordable housing that would promote desegregation. What policies or practices perpetuate segregation and how will your proposal address them?

Offering a variety of housing types for varying income levels throughout our community has been effective against segregation. Our proposal incorporates opportunity for new housing and maintenance of existing homes regardless of location or racial identification. Mixed-income developments with multi-lingual support offer opportunity for everyone.

How will you ensure that your proposal will not cause affordable housing to be further concentrated in low-opportunity areas or in areas that already have ample affordable housing? How will your proposal increase housing choice by expanding the neighborhoods in which residents who need affordable housing can live?

As a small town with robust zoning considerations, low-opportunity areas are few and mostly concentrated in historical industrial pockets of town. Offering maintenance funds allow for improved living conditions within these areas and diverse approaches to multi-family development in high-opportunity areas allows for relocation, or housing choice options for those wishing to relocate. The housing preservation fund proposal specifically targets areas already experiencing or likely to experience gentrification and fragmentation of lower-income working neighborhoods.

How does your approach address the unique housing needs of members of protected class groups, including persons with disabilities, families with children, and underserved communities of color?

All our programs are facilitated by a native Spanish-speaker staff person to support our largest minority demographic of households with Mexican descent, but also Latine families in general. Production of housing includes livability standards of design and varying numbers of bedrooms to provide for families with children. The home maintenance loan proposal allows for accessibility improvements required of residents with disabilities.

Does your plan address issues identified in your jurisdiction's most recent fair housing plan or plans?

Our plan address issues identified in the Jackson/Teton County Housing Supply Plan, which ensures compliance with Fair Housing Act.

Have you considered the risk of displacement associated with your proposal? How will you ensure that your planned activities do not lead to the displacement of vulnerable residents in communities of color? Describe any anti-displacement measures included in your proposal (e.g., replacement of affordable units for new construction, or right of first refusal for tenants)?

Only the S4 flats construction may result in displacement due to redevelopment of a site with three existing homes. One home is positive for asbestos which was abated, rendering the home no longer habitable. Current leasing of the other two market homes to be demolished are seasonal workers that do not live in Jackson year-round.

How will your proposal address the housing needs of people with disabilities and increase their access to accessible and affordable housing? How will it support independent living with access to supportive services and transportation in the community? Please also describe your plan to ensure compliance with ADA?

New construction at S4 Flats as well as any ARUs constructed are required to be compliant with ADA standards of the effective Building Code. The home maintenance micro-loan proposal is purposefully designed to help people with disabilities improve livability of their homes, allow residents to age in place, and improve overall accessibility for future residents.

Describe any equity-related educational resources, tools, or public input that have informed your proposal.

Do you plan to engage and support minority-, women-, and veteran-owned businesses during your proposed housing production process? Do you have a diversity and equity plan in place or plan to create one?

We plan to create a diversity and equity plan.

Other equity considerations informed by your local circumstances.

Describe how you will evaluate the effect of your proposal on promoting desegregation, expanding equitable access to well-resourced areas of opportunity, and furthering the de-concentration of affordable housing

How will you track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities?

If the applicant proposes to use PRO Housing funds to fund housing units, the applicant must discuss how those benefits will be affirmatively marketed broadly throughout the local area and nearby areas to any demographic groups that would be unlikely or least likely to apply absent such efforts.

4.1 Increasing Access to Areas of Opportunity

4.2 Desegregation

4.3 Increasing Housing Choice

4.4 Mitigating Displacement

4.5 Accessibility

4.6 Evaluating Effectiveness

4.7 Marketing

All marketing of available homes occurs in both English and Spanish via email, text, and in-person events, with in-person assistance available for anyone. We use partnership with Voices JH to utilize their network of immigrant families to ensure accessibility. We measure effectiveness by evaluating demographic components of residents annually and have a minimum goal of meeting statistical representation matching community-wide demographic rates.

5. Budget and Timeline

5.1 Budget Narrative:

Budget Description	Cost	Federal Request	Non-Federal Leverage
S4 Flats	\$8,200,000	\$1,000,000	\$3,290,135
ADU user guide	\$20,000	\$0	\$20,000
ADU construction plans	\$150,000	\$150,000	\$0
ADU construction financing fund	\$2,000,000	\$2,000,000	\$0
Historic home preservation feasibility study	\$50,000	\$50,000	\$0
Historic home preservation program pilot fund	\$2,200,000	\$2,000,000	\$200,000
Habitability improvement & maintenance fund	\$1,800,000	\$1,800,000	\$0
<b>TOTAL</b>	<b>\$10,510,135</b>	<b>\$7,000,000</b>	<b>\$3,510,135</b>

Personnel - \$20,000 (\$0 federal and \$20,000 leverage)

Staff time to prepare ADU User Guide - \$20,000 (\$20,000 leverage)

$$200 \text{ staff hours} \times \$100/\text{hour} = \$20,000$$

Housing Authority staff will develop and publish the ADU user guide and are providing their staff time dedicated to this task as leveraged funding. This task is estimated to require 200 hours of staff time for research, writing, and publication.

Construction - \$4,290,135 (\$1,000,000 federal and \$3,290,135 leverage)

S4 Flats Development - \$4,290,135 (\$1,000,000 federal and \$3,290,135 leverage)

Close the funding gap on a new affordable, multifamily housing project in the Town of Jackson. The S4 Flats development will bring 12 new units of housing to a residential block in southwest Jackson. Eight of these homes will be affordable ownership and four of these homes will be workforce rental, and the Town of Jackson has secured eight employee rights of first purchase in the development. The Town of Jackson is providing the land (910 Smith Lane and 915 Simon Lane) and an additional \$300,632 in funding for the development for a total public investment of \$2,700,632. The private developer is providing an additional \$589,503 in leveraged funds for the development.

Contractual - \$200,000 (\$200,000 federal)

ADU Pilot Program Construction Plans - \$150,000 (\$150,000 federal)

Contract local architect to prepare complete construction plans for three ADU designs that meet Town of Jackson Land Use Regulations and Building Code.

Historic Home Preservation Program Feasibility Study - \$50,000 (\$50,000 federal)

Conduct a feasibility study with an examination of Transferable Development Rights (TDR), an opportunity map which identifies potential properties for historic designation and future protection, and evaluation of whether a revolving loan fund or sinking fund is the better financing model for the preservation pilot fund.

Other - \$5,800,000 (\$5,800,000 federal)

ADU Pilot Program Construction Financing Fund - \$2,000,000 (\$2,000,000 federal)

Fund this new construction financing which will provide down-payment/construction grants to landowners in exchange for temporary or permanent deed restriction of the ADU for local workforce households.

Historic Home Preservation Program Pilot Fund - \$2,200,000 (\$2,000,000 federal and \$200,000 leverage)

Fund this new pilot fund which will be used to purchase historic homes, place historic preservation easements, and place housing deed restrictions to permanently protect units for workforce housing. JTCHA has budgeted \$200,000 in funding for the pilot fund to leverage federal funds.

Habitability Improvement and Maintenance Fund - \$1,800,000 (\$1,800,000 federal)

Distribution of low/no interest construction loans for general home maintenance and small grants for emergency health and safety repairs to owners or HOAs of permanently deed restricted affordable homes to support the physical preservation of existing deed restricted affordable homes.

5.2 Scaling: Each funding component addresses a key barrier to affordable housing production and preservation and is designed to work in conjunction with the other components to address the need for 2,000 affordable and workforce housing units by 2027. That said, JTCHA recognizes that HUD PRO Housing funds are limited, and has the ability to scale the project in the event that the full request of \$7,000,000 cannot be met in full. Each of the four project components could be individually funded and completed on their own without impacting the scope of work of the other components. Scaling down the project would not impact the geography of the project. Each component is ranked below on their priority for funding based on their shovel-readiness and impact on addressing the housing crisis with a minimum funding level needed to achieve measurable results:

#### Construction Gap Financing for S4 Flats - \$1,000,000 request (\$1,000,000 minimum)

This project component is the highest priority for funding, as the S4 development is shovel ready but construction cannot start until the remaining \$1,000,000 funding gap is filled. With significant public funds and developer funds already committed to the project, HUD PRO Housing funds will close the funding gap and deliver 12 new permanently deed-restricted homes. The development will also serve as a catalyst for the transition to denser multi-family housing in the West Jackson high opportunity area. The minimum funding amount needed to complete this component is \$1,000,000.

#### ADU Pilot Program - \$2,150,000 request (\$1,150,000 minimum)

JTCHA has been unsuccessful in getting the pilot funded through the joint Town/County budget process due to limited resources. With HUD PRO Housing financial assistance, JTCHA will be able to jumpstart the program by completing an ADU user guide, contracting with a local architect to design three ADU construction plans, and start an ADU construction financing fund. With these foundational pieces in place, JTCHA will have more leverage in securing ongoing funding for the construction financing fund in future budget processes. The ADU Pilot Program is a high priority for funding due to the significant groundwork that JTCHA staff have already put in to designing the program, and its projection to add 30 number of new affordable housing units over the project period. The minimum funding amount needed to complete this component is \$1,150,000 (\$150,000 to contract architect for three ADU construction plans and \$1,000,000 to jumpstart the ADU construction financing fund with enough funding to build ADUs).

#### Historic Home Preservation Program - \$2,050,000 request (\$1,050,000 minimum)

The Historic Home feasibility study and pilot fund will identify historic properties and place easements and deed-restrictions to permanently protect historic housing for workforce housing. Because this component will require a feasibility study before getting off the ground, it is not projected to add/preserve affordable housing units as immediately as the top two priority components but is still a high priority for funding. The minimum funding amount needed to complete this component is \$1,050,000 (\$50,000 for the feasibility study and \$1,000,000 to jumpstart the Historic Home Preservation Program Pilot Fund with enough funding to place easements and deed restrictions).

#### Habitability Improvement and Maintenance Fund - \$1,800,000 request (\$500,000 minimum)

This fund is the lowest priority for funding but is still a critical part of JTCHA's strategy to address the affordable housing crisis by preserving existing affordable and workforce housing units without the large upfront financial burdens posed by new construction and acquisition. The minimum funding amount needed to get the fund running is \$500,000)

Based on the above priority ranking and minimum funding amounts, with an award of \$3,500,000 (50% of the total funding request of \$7,000,000) the project team would be able to complete the following scope of work:

\$1,000,000 – fully fund the development of S4 flats

\$150,000 – complete ADU user guide and three pre-approved ADU construction plans

\$1,300,000 – fund the ADU construction financing fund

\$50,000 – complete Historic Home Preservation Program feasibility study

\$1,000,000 – fund the Historic Home Preservation Program Pilot Fund

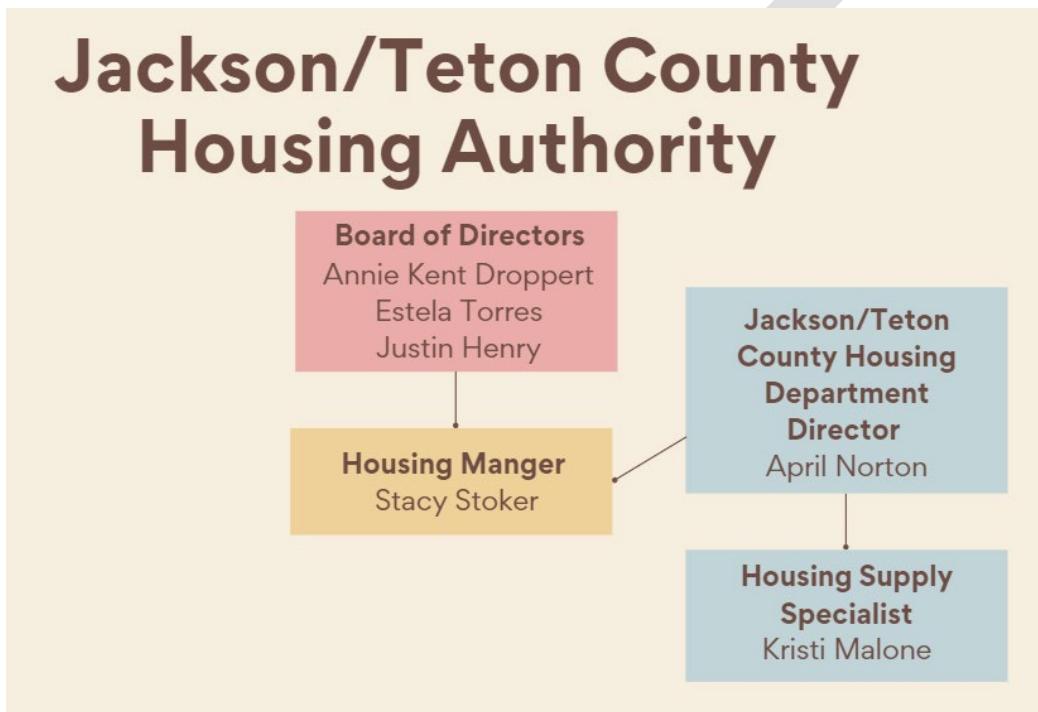
Total = \$3,500,000

### 5.3 Timeline:



## Exhibit E Capacity

1. Organizational Chart: Provide an organizational chart that identifies names and positions of key management for proposed PRO Housing activities. In addition to key management, be sure to include a count of all full-time staff that will manage PRO Housing activities. Please also include a description of your existing management structure and staff roles, including any gaps, vacancies, or positions contingent on award. If you are applying with a partner or partners, provide this information for each organization.



Full-time Staff that will manage PRO Housing activities: 3 (Housing Supply Specialist, Housing Department Director, Housing Manager)

**Existing Management Structure and Roles:** PRO Housing activities will be led by the Housing Supply Specialist with direct supervision and oversight by the Housing Department Director. The Housing Manager will serve as active intermediary between the Jackson/Teton County Housing Authority Board as applicant/lead agency and the PRO Housing work conducted by the supply arm of the Housing Department. This dual structure of Housing Authority exercising power to own property, enforce restrictive covenants, and manage grant funding complements the Housing Department's staff resources to strategize and implement work plans designed to create and preserve affordable housing for the local workforce. The existing management structure and staffing of our organization will be utilized, and we currently have no gaps, vacancies, or positions contingent on the award that impact implementation of our proposal or management of grant funds. While we may utilize other partner organizations as resources for PRO Housing activities, we are not applying with any partner organizations and will be solely responsible for management of funds and completion of work.

**2. Lead Agency:** Which specific agency or entity will lead implementation of the proposed activities? What is its role and management capacity?

The Jackson/Teton County Housing Authority is applicant and lead agency. Jackson/Teton County Housing Department staff working under the authority of the Housing Authority will lead implementation of project activities.

**3. Project Management:** Describe how the agency or entity has (or plans to obtain) the relevant project management, quality assurance, financial and procurement, and internal control capacity to quickly launch and implement a major project.

The Jackson/Teton County Housing Department is staffed with one FTE and ½ of the Housing Director FTE solely working on increasing the local supply of affordable workforce housing. Additionally, the Housing Manager administrates oversight and compliance of all existing deed-restricted affordable and workforce homes and has support staff in rental/sales, resident compliance, and applicant services. Supply staff has abundant relevant experience, serving as project managers of three developments completed just this year that created 111 new affordable and workforce homes. Historically, since the Department's current structure commenced in 2015, 10 new affordable housing developments have been completed under staff direction and our largest, at 226-units, is underway set to break ground in 2026. Additionally, Supply staff administers two specialty programs to advance local housing solutions: the Preservation Program, which provides stipends in exchange for permanent deed restriction of existing homes and the Senior and Assisted Living Program, which focuses on improving housing accessibility for households challenged by disabilities. Management staff oversees more than 1,000 existing deed-restricted affordable and workforce homes dating back to the 1990s and has the depth and breadth of experience and skill to expand services to newly acquired deed-restricted homes. The Housing Department Rules & Regulations guide quality assurance of new affordable homes via Livability Standards that must be incorporated in design as well as improvements to existing deed restricted homes via capital improvement credit verifications. As a local government entity, the Housing Department must follow both State and County protocol on financial management and reporting, and strict guidelines for procurement of services. With a localized, intrinsically connected staff and Board structure, we have the agility to quickly launch and implement activities but also have dedicated capacity to successfully complete major projects.

4. Leadership Capacity and Legal Authority: Describe your jurisdiction's leadership capacity and legal authority to effectively implement your proposed reforms. If other government entities are necessary for implementation, describe how their support is secured.

As a joint powers board, the Housing Authority Board is authorized by the Town of Jackson and Teton County, Wyoming to represent their collective interests in the management of affordable housing resources. Paired with the support of the Housing Department as local government employees under the jurisdiction of Teton County, WY, this structure allows for autonomous leadership direction from the Housing Supply Board and direct access to the leadership capacity of the Board of County Commissioners. The Housing Authority Board has the legal authority to purchase and own land or individual housing units, collect and expend housing-dedicated funding, and manage restrictive covenants that enforce long-term affordability standards—all of which are integral for adding affordable and workforce deed restrictions to existing homes, financing the construction of new affordable and workforce homes as proposed in this application. Any regulatory or code changes required as part of this proposal are under the legal authority of the Teton County Board of County Commissioners and Jackson Town Council, which jointly staff the Housing Department and act on recommendations made by the Housing Director. All government entities necessary for implementation of this proposal are already associated with the project team.

5. Partner Capacity: If your proposed approach includes partners, describe each partner's capacities and credentials related to its role in implementing the project. Is your capacity to design, plan, or remove a barrier dependent on partner capacity? If yes, describe the dependency.

Our capacity to successfully complete the work outlined in this proposal is not dependent on partner organizations. Our proposal includes funding to hire expert consultants in the fields of historic preservation and architecture to guarantee capacity for specific deliverables.

6. Experience Coordinating Partners: Describe the agency's or entity's experience working with and coordinating partners (including contractors, funders, subrecipients, community stakeholders, and other government agencies) in previous projects similar in scope or scale to the proposed activities. If you do not have such experience, how will you obtain it?

The Housing Authority and Housing Department have extensive experience

7. Application Writer: Who wrote this application: applicant staff, or a professional technical or grant writer in a consulting or contract capacity? Please provide name(s), title(s), and organization(s). If the application was drafted by someone external to the applicant's organization, describe how the applicant staff and decision makers were actively engaged in the development of this proposal and how this coordination may continue over time.

This application was written collaboratively by Housing Department and Housing Authority staff with technical support from Sustainable Strategies DC, a grant writing consultant organization that has worked with the Town of Jackson and Teton County for over two years.

8. Civil Rights and Fair Housing Experience: Do you or any partner(s) have experience working with civil rights and fair housing issues including, for example, working with data to analyze racial or economic disparities? Do you or your partner(s) have experience designing or operating programs that have provided tangible reductions in racial disparities?

The Housing Department reports on racial disparity annually in our Housing Action Plan and has a long-standing relationship with a local non-profit Voices JH that works to reduce resource scarcity for racial disparities, specifically in immigrant populations.

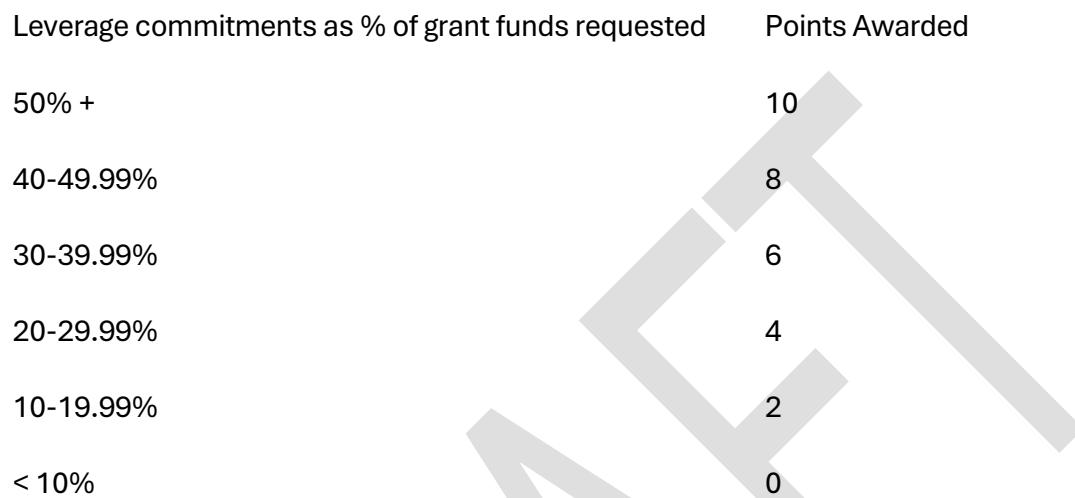
9. Sub-Applicant Capacity: If proposing to act as a pass-through entity by operating a subgrant program, you must address your capacity as well as confirming that you will evaluate a subapplicant's capacity when they apply to your subgrant program.

Not applicable—we do not intend to act as a sub-grant program.

## Exhibit F Leverage

Are you leveraging other funding or non-financial contributions?

Scoring for Leveraged Funding



Preservation of Historic Homes: \$1,396,275 from General Fund

ADU Pilot Program: \$20,000 from General Fund

S4 Flats Development: \$ 2,763,200

Habitability Improvement/Long-term Maintenance Fund: \$0

Budget Description	Cost	Federal Request	Non-Federal Leverage
S4 Flats	\$4,290,135	\$1,000,000	\$3,290,135
ADU user guide	\$20,000	\$0	\$20,000
ADU construction plans	\$150,000	\$150,000	\$0
ADU construction financing fund	\$2,000,000	\$2,000,000	\$0
Historic home preservation feasibility study	\$50,000	\$50,000	\$0
Historic home preservation program pilot fund	\$2,200,000	\$2,000,000	\$200,000
Habitability improvement & maintenance fund	\$1,800,000	\$1,800,000	\$0
<b>TOTAL</b>	<b>\$10,510,135</b>	<b>\$7,000,000</b>	<b>\$3,510,135</b>

## Exhibit G Long-term Effect

1. Sustained Housing Production: The Teton County PRO Housing Action Plan funds models, systems, and capacity building activities that will tackle Teton County's remaining affordable housing barriers to boost production and preservation beyond the project period.
  - 1.1 Catalyze Infill Development: The S4 Flats Development is a catalyst project that will accelerate infill development and density increases in West Jackson and other high opportunity areas by modelling how modest density increases can remain compatible with the Town's historic character and positively contribute to neighborhood vitality. This modular development will also serve as a proving ground for this emerging style of development. JTCHA is confident that a successfully delivered S4 Flats Project will generate sustained interest among both private and non-profit development partners in bringing new modular, multi-family developments to market. Thus, while the S4 Flats project's immediate impact is adding 12 new units of affordable housing, it is projected to have a lasting positive impact on housing production by catalyzing density increases in high opportunity residential neighborhoods and modeling how modular developments can reduce costs and shorten timelines.

1.2 Boost ADU Production: The ADU Pilot program will remove financial and technical literacy barriers to ADU production, empowering landowners to take advantage of recent zoning updates and incentives to increase the supply of ADUs in the Town of Jackson. With a step-by-step construction guide, full construction plans, and financing support from JTCHA, landowners will have both the technical and financial support they need to bring ADUs to the market. The community has demonstrated an eagerness for ADUs, both to address the housing shortage and open up new income streams to meet rising costs of living, so this ADU Pilot Program is projected to have significant positive impact on long-term affordable housing production.

1.3 Historic Home Preservation: JTCHA has observed how the demolition and construction of new luxury single-family homes on a single plot can quickly lead to the gentrification of entire blocks and neighborhoods, destroying what was once concentrated affordable housing and fracturing social ties. Recent zoning updates give JTCHA the authority to combat market forces and save historic affordable housing from demolition and gentrification, but HUD PRO Housing funding is needed to put that power into practice by designating properties and placing easements and deed-restrictions. Equipping JTCHA with a feasibility study and pilot funds will allow them to start designating and protecting properties, saving individual units in the short and medium terms. These individual projects will serve as neighborhood anchors that stymie initial gentrification efforts and prevent displacement from taking root. Thus, supporting these individual projects in the short-term will promote the long-term preservation of whole blocks and neighborhoods of affordable housing, amplifying the impact of grant funds in preserving affordable housing.

1.4 Habitability Improvement and Maintenance Fund: As detailed above, preserving individual units of existing affordable housing (both naturally occurring and deed-restricted) is key to preventing the destruction of neighborhood-wide affordability amidst intense market pressures. The Habitability Improvement and Maintenance Fund will help preserve existing affordable housing units to prevent the initial spread of displacement projects and promote the long-term preservation of whole blocks and neighborhoods of affordable housing.

## 2. Deliverables and Impacts

Deliverable	Long-Term Impact
<p><b>S4 Flats Development</b> 12 new units of affordable ownership and workforce rental housing</p>	<p>Catalyze density increases in residential neighborhoods to accelerate the production of affordable and workforce housing units.</p> <p>Spark widespread use of modular developments to bring new units to market faster and cheaper</p>
<p><b>ADU Pilot Program</b> ADU user guide Three ADU construction plans Construction financing fund</p>	<p>Increased production of ADUs</p> <p>Open new income streams for disadvantaged landowners to promote wealth-building</p>
<p><b>Historic Home Preservation Program</b> Feasibility study Pilot fund</p>	<p>Build a broad inventory of potential historic properties for preservation</p> <p>Prevent the initial spread of gentrification</p> <p>Preserve neighborhood social ties</p>
<p><b>Habitability Improvement &amp; Maintenance Fund</b> Low/no interest construction loans Small grants for emergency repairs</p>	<p>Keep low- and moderate-income residents in their homes</p> <p>Ensure healthy living standards for low- and moderate-income residents</p> <p>Prevent the initial spread of gentrification</p> <p>Preserve neighborhood social ties</p>

3. Modelling: The Teton County PRO Housing Action Plan will serve as a model to other rural resort communities facing affordable housing shortages by demonstrating how the combined use of market-based and restriction-based tools can boost both affordable housing production and preservation amidst intense market pressures. Teton County's affordable housing challenges are shared by many other rural resort communities, especially in the Mountain West, and JTCHA aims to share successes and lessons learned from the PRO Housing Action Plan to help municipal partners address their housing challenges. The post-pandemic migration of wealthy homebuyers and remote workers to rural resort communities has amplified affordable housing shortages, overwhelmed local infrastructure, and sparked the displacement of lower-income and disadvantaged residents. Jackson is unique among its peers in that it has been dealing with these challenges for decades, and thus has been building a sustained approach to tackle the affordable housing crisis for many years. The first steps in tackling this crisis have included creating a housing-friendly regulatory environment through zoning code updates and building community buy-in through outreach, education, and planning. With these steps largely completed, Teton County will model implementation actions through the PRO Housing Action Plan that other communities still in the beginning stages will be able to learn from, adopt according to their own circumstances, and deploy. To this end, JTCHA will produce a detailed PRO Housing Action Plan Report with project insights and data. JTCHA has extensive experience conducting similar reporting through the development of its Housing Supply Plan and Indicator Reports, which provide a depth of information for local policy makers, professional staff, and the private sector to utilize when making decisions about future developments, zoning, incentives, and investments (including philanthropy). This data collection and analysis has been recognized nationally as a best practice for communities tackling their housing needs. Other communities will be able select components of the Teton County model that align with the barriers and opportunities present in their communities. A strength of the Teton County model is that each of the four components work independently of each other and can be scaled up or down according to need and resources. For example, the Teton County's ADU Pilot Program will include the design of three ADU construction plans for use by landowners. In a larger community like Denver, CO the ADU Program produced six different ADU designs, but in a smaller resort community, a single ADU design might be enough to meet the needs of landowners at a lower cost.

4. Envisioning Success: The primary measure of success is the number of affordable and workforce housing units preserved and produced by 2030, and overall progress on meeting the need for 2,000 housing units by 2027. Each of the following metrics and their quantifiable outcomes align with the four barriers described in Exhibit C. Need subsection 3. Remaining Barriers to provide a quantifiable measure of the impact of PRO Housing Funds on removing Teton County's remaining housing barriers.

Metric 1: Density Increases and Infill Development

Outcome 1.1: Completion of 13 new units of affordable housing at S4 Flats.

Outcome 1.2: At least [12] of multifamily housing planned or built in high opportunity areas (Town Residential Core, Mid-Town, West Jackson) by 2030.

Outcome 1.3: At least one new modular multifamily development planned or constructed by 2030.

#### Metric 2: ADU Production

Outcome 2.1: At least 30 new ADUs planned or constructed using pre-approved plans by 2030

#### Metric 3: Historic Home Preservation

Outcome 3.1: At least 15 historic preservation easements/deed-restrictions placed on historic homes by 2030.

#### Metric 4: Affordable Housing Preservation

Outcome 4.1: At least 40 affordable and workforce housing residents served by Habitability Improvement and Maintenance Fund by 2030.

5. Equity: A historic preference for low-density, single-family development backed by restrictive land use regulations is the primary driver of the affordable housing shortage. This development pattern sucked up an already scarce supply of land to the benefit of early homebuyers and at the expense of affordability for low- and moderate-income workers. Teton County's large immigrant population have suffered as well, as these newer residents to Teton County have largely been priced-out of home buying and wealth-building opportunities due to the already sky-high ownership prices and exorbitant rental prices making it difficult to afford daily essentials, let alone build the capital needed to purchase a home.

While recent zoning updates now empower local government to tackle the challenge at its root by increasing density and providing a greater diversity of housing types, decades of intense upwards market pressure makes it difficult to deliver the volume of housing needed. This PRO Housing project directs resources to areas of high-opportunity in and around the core of the Town of Jackson that historically have shut out disadvantaged residents to accelerate the transition into denser, mixed-use, and mixed-income neighborhoods. This approach solves the immediate need for more affordable housing units, but also positively addresses the need for generational wealth-building opportunities for disadvantaged residents. For example, a lower-income landowner in the West Jackson neighborhood can take advantage of ADU technical and financing resources to build an ADU in their backyard to house a local worker and generate a monthly rental income. Or, a lower-income homeowner struggling to keep up with the costs of homeownership can receive financial assistance in exchange for a deed-restriction on their property, keeping them in their home to mitigate displacement and gentrification and reserving the housing unit for affordability in the long-run. The Teton County PRO Housing Action Plan includes both market-based and restriction-based tools to effectively open up high-opportunity areas to those who have historically not been able to benefit from proximity to jobs or access to wealth-building opportunities.

**Attachment A. Summary of comments received on published Application and list of commenters by name/organization.**

DBAFT

**Attachment B. Certification of compliance with NOFO public participation requirements.**

DBAF

## **Attachment C. Advancing Racial Equity Narrative**

This narrative is required and must address the four bullets outlined in the paragraph above. Applicants will submit this narrative according to the instructions in Section IV.B. This narrative will be evaluated for sufficiency and will not change the applicant's score or rank as compared to other applicants. If the narrative is deemed insufficient, it will be a "Curable Deficiency" that will be communicated to the applicant for correction with a notice of deficiency.

1. Analysis of Racial Composition: You analyzed the racial composition of the persons or households who are expected to benefit, directly or indirectly, from your proposed award activities
2. Potential Barriers: You identified any potential barriers to persons or communities of color equitably benefiting from your proposed award activities
3. Eliminating Barriers: You detailed the steps you will take to prevent, reduce, or eliminate these barriers
4. Tracking Progress: You have measures in place to track your progress and evaluate the effectiveness of your efforts to advance racial equity in your award activities.

Our annual Housing Supply Plan on which this proposal is based, analyzes racial composition, barriers and tracks project effectiveness over time for all activities.

#### **Attachment D. Affirmative Marketing and Outreach Narrative**

Any outreach or marketing conducted under a HUD award must be conducted broadly throughout the local area and nearby areas and targeted to reach any eligible persons in demographic groups that would be unlikely or least likely to be aware of the benefits of a HUD award absent such efforts, or entities that serve such groups. Such demographic groups may include, for example, Black and Brown persons or communities, individuals with limited English proficiency, individuals with disabilities, or families with children. Strategies for affirmative marketing or outreach include outreach through community contacts or service providers or at community centers serving the target population; and marketing on websites, social media channels, television, radio, and print media serving local members of the targeted group. You must submit a narrative describing the affirmative marketing/outreach activities that will be conducted if you are selected for a HUD award.

#### **Attachment E. Experience Promoting Racial Equity Narrative**

*In accordance with Executive Order 13985, Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, Executive Order 14091, Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and Federal fair housing and civil rights laws, your application must demonstrate that the applicant has the experience and/or the resources to effectively address the needs of underserved communities, particularly Black and Brown communities. This may include experience successfully working directly with such groups, experience designing or operating programs that equitably benefit such groups, or experience successfully advancing racial equity in other ways. This may also include experience soliciting, obtaining, and applying input from such groups when designing, planning, or implementing programs and activities.*

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