

# City of Jackson, MS

## Housing & Community Development



PRO Housing Grant

# Table of Contents

<b>Table of Contents .....</b>	<b>2</b>
<b>Exhibit A: Executive Summary .....</b>	<b>3</b>
<b>Exhibit B: Threshold Requirements and Other Submission Requirements.....</b>	<b>5</b>
<b>Exhibit C: Need .....</b>	<b>5</b>
<b>Exhibit D Soundness of Approach .....</b>	<b>7</b>
<b>Exhibit E Capacity.....</b>	<b>11</b>
<b>Exhibit F Leverage .....</b>	<b>12</b>
<b>Exhibit G Long-term Effect .....</b>	<b>12</b>

## **Exhibit A Executive Summary.**

**HUD will prioritize applicants that demonstrate:**

- (1) progress and a commitment to overcoming local barriers to facilitate the increase in affordable housing production and preservation; and**
- (2) an acute demand for housing affordable to households with incomes below 100 percent of the area median income. If applicable, proposals should also explain how the funds would be used to identify and remove barriers to affordable housing in a manner that affirmatively further fair housing by expanding access to housing opportunities in well-resourced areas for protected class groups.**

**HUD will also prioritize applicants that demonstrate a commitment and ability to identify and remove barriers to (1) expanding affordable housing in a manner that would promote desegregation; (2) expanding affordable housing in well-resourced areas of opportunity for protected class groups that have systematically been denied equitable access to such areas; or (3) deconcentrating affordable housing and increasing housing choice. HUD encourages applications that incorporate a discussion of key barriers related to land-use regulations, permitting, or related procedural issues. HUD further encourages applicants to outline and discuss how their proposed activities will advance equity, locate affordable accessible housing near transit and bolster access to services and opportunities, increase community resilience and mitigate the effects of natural and environmental hazards, and develop and preserve affordable housing in accordance with input from community members and other stakeholders.**

Understanding the severity and need for quality homeownership and affordable housing preservation within the city of Jackson requires examining the longstanding and interrelated social and structural issues facing our communities.

The shameful practices of slavery to the institution of Jim Crow have ensued extreme and compounded generational disparities and 3<sup>rd</sup> World conditions in many cities throughout the country; specifically we are referencing the history and compounded conditions in Jackson communities, the Capitol of Mississippi.

Post emancipation residential segregation perpetuated poverty patterns by isolating people of color in areas that lack employment opportunities and services, resulting in institutional abandonment, higher crime, and 2x the National average in poverty rates. Housing discrimination both in official government policies and societal attitudes has continued to add to the compounded trauma.

In 1950 the City of Jackson City Council approved large-scale rezoning of communities of color to Industrial zoning use is one of the many tools utilized to reinforce systematic and systemic oppression and perpetuate abandonment of communities of color.

These forces, including the discriminatory criminal justice system and the prison industrial complex founded on Jim Crow principles, increase the risk of homelessness for families and can cause – and potentially has caused - developmental delays among affected children, furthering the epidemic of homelessness within the black community.

Combined with the onset of COVID-19 and its effect on employment, businesses, childcare, and family's ability to maintain financial health and housing, those who are elderly over 60 are experiencing a “crisis within a crisis.”

According to recent census data, the overall population of Jackson has steadily decreased since 1980, primarily due to a decline in the White population. In 1980, Jackson had almost 203,000, while only 173,600 residents lived in Jackson in 2014.

The White population in 2014 was less than one-third of what it was in 1980. The city's communities of color, on the other hand, have grown at a steady pace. Between 1980 and 2014, the White population decreased from roughly 105,800 to slightly more than 30,600.

During the same period, the number of people of color grew from about 97,100 to about 143,000. In 2014, 80 percent of Jackson residents were African American - up from 47% in 1980 - and since 1980, the white population has declined by 71%.

The poverty rate in Jackson has been consistently higher than the national average since 1980. However, since 2020 the percentage of residents in the city living in poverty has been about twice the national average. Today, just under 27% percent of Jackson residents live below the poverty line, which is around \$26,500 a year for a family of four.

The disparity is built within the fabric of the Nation, thus Jackson and the institutional policies which govern our region. Barriers to affordable housing have been caused by zoning decisions, land use policies, or regulations; inefficient procedures; gaps in available resources for development; deteriorating or inadequate infrastructure; lack of neighborhood amenities; and challenges to preserving existing housing stock such as increasing threats from natural hazards such as flood zones.

Limited access to housing has long-term effects on access to opportunity and ability to build generational wealth, especially for underserved communities of color and low-income people. Affordability challenges and the lack of affordable housing supply further increase eviction pressures and likelihood of homelessness for low-income people.

Understanding the socio-economic conditions of Jackson have historically provided opportunities for the building of generationally wealth for those with privilege and has simultaneously prevented wealth building and has forced families to either rent or purchase less efficient higher cost homes.

**Purpose - what we want to do - what is the plan**

HUD further encourages applicants to outline and discuss how their proposed activities will advance equity, locate affordable accessible housing near transit and bolster access to services and opportunities, increase community resilience and mitigate the effects of natural and environmental hazards, and develop and preserve affordable housing in accordance with input from community members and other stakeholders.

**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**

**Exhibit C Need. Review and provide a narrative response to V.A.1.a**

**Describe your efforts so far to identify, address, mitigate, or remove barriers to affordable housing production and preservation.**

**Please address the timeframe for these efforts; how these efforts were adopted, established, or otherwise made permanent; and the measurable impact thus far. Be sure to describe recent policy changes or community planning strategies that you have adopted to increase housing production for low- and moderate-income populations, as well as recent initiatives to preserve affordability, increase access to affordable accessible housing in high opportunity areas, and invest in underserved communities. HUD will rate applicants more highly if they demonstrate that they have successfully taken actions to remove local barriers to increasing affordable housing production and preservation.**

The City of Jackson's Planning department under the Lumumba administration has been working diligently to identify and remove barriers to fair and affordable housing. One of the most influential barriers to affordable housing and production has been our zoning ordinance that was originally adopted in

Ensure Access to and Increase the Production of Affordable Housing  
Increase the Supply of Housing  
Promote Homeownership  
Advance Sustainable Homeownership  
Strengthen Environmental Justice  
Guide Investment in Climate Resilience

**Do you have acute demand for affordable housing? What are your remaining affordable housing needs and how do you know?**

**HUD is prioritizing applicants with acute demand for housing affordable to households with incomes below 100 percent of the area median income and seeks to ensure that awards under this NOFO are directed to applicants with certain objective measures of acute demand for affordable housing. You will be awarded ten (10) points if your application primarily serves a priority geography that has an affordable housing need greater than a threshold calculation for one of three measures. The threshold calculation is determined by the need of the 90th percentile jurisdiction (top 10%) for each factor as computed comparing only jurisdictions with greater than 50,000 population. Threshold calculations are done at the county and place level and applied respectively to county and place applicants. An application can also qualify as a priority geography if it serves a geography that scores in the top 5% of its State for the same three measures.**

**Applications that primarily serve locations outside these priority geographies will not be awarded any of these ten points. The measures are as follows:**

- Affordable housing not keeping pace, measured as (change in population 2019- 2009 divided by 2009 population) – (change in number of units affordable and available to households at 80% HUD Area Median Family Income (HAMFI) 2019- 2009 divided by units affordable and available at 80% HAMFI 2009).**
- Insufficient affordable housing, measured as number of households at 80% HAMFI divided by number of affordable and available units for households at 80% HAMFI.**
- Widespread housing cost burden or substandard housing, measured as number of households with housing problems at 100% HAMFI divided by number of households at 100% HAMFI. Housing problems are defined as: cost burden of at least 50%, overcrowding, or substandard housing.**

**HUD has provided a spreadsheet identifying each of these geographies on its website. To see whether you meet the criteria to receive points, visit the PRO Housing website and view the spreadsheet. You may be awarded up to three (3) additional points for providing compelling information about your affordable housing needs. This information should demonstrate acute demand for affordable housing in your jurisdiction(s) to households with incomes below 100 percent of the area median income. In your narrative, you are encouraged to provide local knowledge that is not already captured by the above measures. Topics that may indicate acute demand for affordable housing include displacement pressures, housing stock condition, age of housing stock, homelessness, ratio of median home price to area median income, and more.**

**What key barriers still exist and need to be addressed to produce and preserve more affordable accessible housing?**

Please describe in detail the leading barriers to affordable housing production and preservation in your jurisdiction(s). A complete response will identify why the identified barriers are key barriers. You may wish to address topics such as the following:

- Permitting procedures and approval timing and predictability
- Fees and taxes (excluding impact and nexus fees for affordable housing)
- Zoning and land use controls
- Infrastructure constraints
- Prohibitive building codes
- Availability of financing and subsidies for affordable housing
- Capacity to conduct meaningful community engagement, procedural delays associated with soliciting engagement or community review, and/or opposition to new and or affordable housing
- Capacity of local affordable housing developers and managers
- Local laws that penalize individuals for reporting or seeking protection from violence
- Other relevant barriers unique to your community If you are not aware of the extent of barriers to affordable housing production and preservation, please describe how the proposed activities will identify barriers and facilitate removal of such barriers.

Exhibit D Soundness of Approach. Review and provide a narrative response to V.A.1.b

**What is your vision?**

A sound proposal will seek to enable increased production and preservation of affordable housing across a broad geographic area over a sustained timeframe. While proposals generally

must ensure that 51 percent of produced or preserved units directly benefit LMI individuals, except for certain new construction of housing activities wherein no less than 20 percent of the units must directly benefit LMI individuals, proposals may also wish to discuss the degree to which barrier reductions will also improve the production of market rate housing (and the potential indirect improvements in affordability generated through increased supply of market rate housing). HUD expects your response to be clear, complete, specific, and fully analyzed. HUD will rate more highly approaches that most directly address the barriers identified in Need [Factor (a)(iii)] and relieve the acute demand. A complete response should address the following:

- Describe your proposed activities and why they are appropriate, given identified Need and applicant Capacity. Show how each proposed activity meets a national objective and constitutes an eligible activity consistent with Sections III.F.1 & 2 of this NOFO. What is the timeframe of the expected benefit?
- Explain how your proposal addresses key barriers to affordable housing production and preservation. What is the connection between your proposed activities and the key barrier(s) you seek to address? Is your proposed activity addressing barriers identified in your earlier response [Prompt (a)(iii)]? If your proposal targets only one barrier, justify this strategy and explain why this individual barrier requires the resources and focus of the entire grant. Provide evidence showing why the proposed approach is expected to succeed in removing the identified barrier(s) and will lead to significant increases in the production and preservation of affordable housing. If applicable, please describe how your proposal will create new housing opportunities without inviting displacement.
- Explain how your proposal compares to similar efforts and how lessons learned from those efforts have shaped your proposal. Describe the successes of previous efforts to undertake similar proposals, whether in your jurisdiction(s) or in another locality. What pieces of those previous efforts succeeded, and how will your proposal emulate them? What pieces of those efforts were not successful, and how will your proposal ensure success while avoiding those pitfalls? If you are proposing activities which have not been tested before, describe why you think the innovative nature of your proposed activity is appropriate.
- You may also wish to discuss how your proposal aligns with existing planning initiatives, services, other community assets (e.g., transportation planning, climate resilience and mitigation plans, public or supportive housing services, economic development opportunities, healthcare or school systems, etc.). For example, does your plan account for expected population change? How does the proposal align with local or regional transportation plans in your jurisdiction(s)? Does your plan improve simplification and harmonization of land-use regulations across multiple municipalities or entities? Do your proposals for transit-oriented development include anti-displacement strategies to ensure that the benefits of station-area investments accrue to all, especially long-time residents of the neighborhood? Does your proposal target new housing opportunities in areas that allow current and future residents to access public transit, jobs, public services, or other amenities? Does your plan support job creation and retention efforts, including consideration for individuals who may work in your jurisdiction(s) but live in another?



**What is your geographic scope?**

Explain your proposal's anticipated effects on targeted locations, neighborhoods, cities, or other geographies. Describe how your proposal preserves and creates housing units in high-opportunity areas and expands opportunity in underserved communities. HUD will rate more highly proposals that address a larger geographic scope. Maps, drawings, renderings, and other graphical representations are optional but encouraged.

**Who are your key stakeholders? How are you engaging them?**

Potential stakeholders may include, but are not limited to, persons with unmet housing needs; residents of public or other affordable housing units; persons from all protected class groups under the Fair Housing Act; local and regional public agencies that provide funding or technical assistance for housing, transportation, and social services; community organizations, especially those that represent protected classes; private and non-profit housing developers; community land trusts; advocacy organizations and legal groups; business and civic leaders; and others. Applicants subject to Consolidated Plan requirements (States and units of general local government) can describe their actions as required by 24 CFR part 91 and as related to the prompts below. Applicants not subject to Consolidated Plan requirements (Metropolitan Planning Organizations and Multijurisdictional entities) can describe their actions as related to the prompts below.

- Describe your key stakeholders and how you conducted outreach in developing this proposal. Please also describe your strategy for continued outreach during the grant's period of performance.
- 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.
- Describe how you incorporated input from stakeholders into your proposal.
- Describe your strategies to encourage public participation, build support, and engage community members, including those most likely to benefit from your proposed activity.

**How does your proposal align with requirements to affirmatively further fair housing?**

Please respond to each of the following:

- 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?
- 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?
- 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?
- 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? • Does your plan address issues identified in your jurisdiction's most recent fair housing plan or plans? • 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)? • 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 the Americans with Disabilities Act (ADA) and accessibility requirements under the Fair Housing Act. • Describe the implementation and/or enforcement plan for your proposal. Describe how you will approach resistance (e.g. litigation, environmental review, design standards) to the elimination of your targeted barrier(s). • 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? • 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. Note that any actions taken in furtherance of this section must be consistent with federal nondiscrimination requirements.

### **What are your budget and timeline proposals?**

funds and estimates all applicable costs. Describe how you determined the budget and how you will ensure that the project will be cost-effective, in line with industry standards, and appropriate for the scope of the project. HUD will evaluate your proposed project cost estimate on the extent to which projected sources, including PRO Housing funds and any leveraged funds, are sufficient for the scope of the proposed project as a whole. • Please describe how you would budget for and manage a successful project if HUD awards a different dollar amount than you are requesting. What is the minimum funding amount that would allow you to carry out your proposal in some form, and what would that proposal achieve? If you were to receive only 50% of your request, what would you be able to achieve? • Provide a schedule for completing all of the proposed activities in advance of the expenditure deadline at the end of FY 2029. The schedule should identify each significant activity and milestone required for completing the

planning process as well as relevant sub-tasks and should list the planned start and completion dates of all items. The application may include additional description of the schedule in the narrative exhibits.

**Exhibit E Capacity. Review and provide a narrative response to V.A.1.c**

**What capacity do you and your Partner(s) have? What is your staffing plan?**

**Describe your capacity for managing a Federal grant of this size and scope. In Page 40 of 80 evaluating this subfactor, HUD will consider the degree to which applicants demonstrate clear capacity, or a plan to develop capacity, in managing Federal funds; project management on the scale of the idea or proposal; and leadership capacity to coordinate among proposed partners. Rather than measuring general capacity, HUD will measure your specific capacity to carry out your proposal, and your responses should reflect this. A complete response should address the following:**

- Which specific agency or entity will lead implementation of the proposed activities? What is its role and management capacity?**
- 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.**
- 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.**
- 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. What is your plan to regain capacity if a partner drops out?**
- 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 of scale to the proposed activities. If you do not have such experience, how will you obtain it?**
- 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.**
- 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? 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.**

The City of Jackson is...

Project Lead: Chloe Dotson, has over ten years of development experience. Growing up with both parents as registered architects involved (in pre LIHTC) HOPE VI and URP projects in the early 80's and 90's, she has had insurmountable exposure to architectural design, planning, and development from a young age. Holding a MURP and BUPD with over 12 years of professional experience, she has served in high-level programming and development capacities in Wisconsin, Texas, and now Jackson, MS. Ms. Dotson has built, acquired, and/or rehabbed over 700 multifamily and single-family units as well as commercial spaces utilizing a variety of funding sources including LIHTC, NMTC, HTC, State and local funding mechanisms, conventional financing, grant writing, etc. As a developer in South Texas, combining LIHTC with HOME funds, she has extensive experience in planning, development and construction knowledge of Davis-Bacon and Section 3 compliance.

Exhibit F Leverage. Review and provide a narrative response to V.A.1.d

**Are you leveraging other funding or non-financial contributions?**

As noted in Section III.C, this program does not require leveraging. Nonetheless, HUD views leveraged commitments as an indicator of support and commitment in the community. Additional funds may also increase the effectiveness of the proposed activities. An application will earn points in accordance with Table 1 based on the percentage of leveraged commitments for the proposed activities. In addition to financial Page 41 of 80 contributions, applicants may credit the dollar amounts of any non-financial contributions (e.g., donations of land or property, community benefit agreements, etc.) towards their percentage of leveraged commitments. HUD may also award points for clear and compelling non-quantifiable contributions to the project that significantly advance the project's goals, up to the maximum of ten (10) points.

Exhibit G Long-term Effect. Review and provide a narrative response to V.A.1.e

**What permanent, long-term effects will your proposal have? What outcomes do you expect?**

The perception that manufactured housing is inherently more vulnerable to storms is a gross overgeneralization — provided the houses meet federal code in place since 1994. Manufactured homes are no more susceptible to water damage than site-built housing, and their vulnerability to wind damage can be mitigated using best practices for tie-downs. Research

by Kevin Grosskopf — who was at the University of Florida at the time — studied the performance of 30,000 manufactured homes directly affected by the busy 2004 hurricane season and found that 14% of pre-1994 manufactured homes were destroyed. But none of the post-1994 homes were damaged to that degree.

The problem is that manufactured housing has tended — thanks to NIMBYist municipal codes — to end up far from traditional residential areas in some of the most vulnerable parts of the country, often unincorporated county land that lacks access to important infrastructure. In Texas-focused research, a group of Texas A&M and University of Colorado Denver academics found that local governments use single-family zoning and density rules, among other devices, to essentially segregate manufactured-housing communities — affecting both access to infrastructure and social services and exposure to hazards. “In part, that’s because of a long history of a planning bias against manufactured housing,” said Esther Sullivan, one of the authors of that study and the author of *Manufactured Insecurity: Mobile Home Parks and Americans’ Tenuous Right to Place*.

Diligent and equitable community planning is one crucial ingredient to mitigate worst-case outcomes, as is improvement of data collection and strong pre-storm communication. Authorities nationwide must do a better job of documenting the footprint of their manufactured-home communities to understand which ones are most at risk and how best to communicate with them on disaster preparedness. Undoubtedly, there will be some communities with older manufactured homes that may be candidates for full-scale “managed retreat” programs, in which governments help residents move to better structures and safer places.