
January 22, 2026

The Honorable Eric Burlison
 Chairman
 Subcommittee on Economic Growth,
 Energy Policy, and Regulatory Affairs
 Committee on Oversight and Government
 Reform
 House of Representatives
 2157 Rayburn House Office Building
 Washington, DC 20515

The Honorable Maxwell Frost
 Ranking Member
 Subcommittee on Economic Growth,
 Energy Policy, and Regulatory Affairs
 Committee on Oversight and Government
 Reform
 House of Representatives
 2106 Rayburn House Office Building
 Washington, DC 20515

Dear Chairman Burlison and Ranking Member Frost:

In light of the Subcommittee's January 22, 2026, hearing, Housing Affordability: Saving the American Dream, attached please find Western Governors' Association (WGA) Policy Resolution 2026-04, Housing is Foundational to the Success of the West. The resolution communicates Governors' policy recommendations to improve housing across the West.

The resolution also incorporates by reference the report from WGA's recent Chair initiative, BRAND West: Building Resilient and Affordable New Development in the West. Led by WGA's immediate past Chair, New Mexico Governor Michelle Lujan Grisham, the initiative examined strategies and policies to address housing availability and affordability while promoting smart and sustainable development across western communities. Both the resolution and the report include a series of bipartisan recommendations for federal action for the Subcommittee's consideration.

I request that you include this document in the permanent record of the hearing, as it articulates Western Governors' collective and bipartisan policy on this important issue.

Thank you for your consideration of this request. Please contact me if you have any questions or require further information.

Sincerely,



Jack Waldorf
 Executive Director

Attachments



Policy Resolution 2026-04

Housing is Foundational to the Success of the West

A. BACKGROUND

Housing shortages across the nation have reached a tipping point, driving costs to untenable levels in many communities and leaving affordable housing out of reach for a growing number of Americans. This crisis did not occur overnight. Over the past few decades, housing development has failed to keep pace with demand, resulting in chronic underbuilding and an estimated shortfall of 3.8 million units. At the same time, existing affordable housing is continually lost due to market forces and unmet repair needs. Onerous and inefficient regulations at the local, state, and federal levels have further stifled development and limited housing options. Variations in material costs, workforce availability, and supply chains have also affected project timelines, development expenses, housing prices, and the sector's overall capacity to meet housing demand.

Population growth is another challenge, and one that is particularly acute in the West. States and communities are still adapting to these mounting growth pressures and intensified housing demand. In 2022, six of the ten states in the U.S. with the biggest gaps between housing needs and availability were in the West, with housing deficits spreading rapidly to suburbs and small towns. Urban centers and rural areas alike are grappling with the social, economic, and environmental implications of inadequate access to housing for their residents and local workforce. Housing is a cornerstone of prosperity and well-being, affecting poverty, health, stability, economic mobility, and the environment. Expanding access to housing can help address many of the interrelated issues facing western states.

B. GOVERNORS' POLICY STATEMENT

1. The Building Resilient and Affordable New Developments in the West, or BRAND West, Chair initiative report contains recommendations to expand access to housing in western states. It focuses on four key areas to improve housing access for our residents: simplifying and streamlining housing development, reducing the costs of homebuilding, supporting families through initiatives that help renters and homebuyers, and investing in strategic, innovative, and data-informed initiatives across the housing ecosystem. Western Governors incorporate the recommendations identified in the BRAND West Chair initiative report into this resolution by reference.
2. Western Governors support federal efforts to streamline and upgrade systems and processes for housing programs, where appropriate, and urge Congress to allocate funding to maintain and modernize the technology used by federal housing agencies. In addition, we encourage federal and tribal agencies to support their regional offices and state staff to ensure the consistent and efficient delivery of federal housing services.
3. Western Governors urge the federal government to improve consultation and coordination with state housing finance agencies, federally or state-recognized tribal governments, and

public housing authorities, especially around any new federal funding sources and programmatic changes.

4. Western Governors encourage the U.S. Department of Housing and Urban Development (HUD) to review and allow for alternative processes in non-disclosure states to address the increasing price of housing and adjust loan limits accordingly.
5. The Fiscal Year 2025 Budget Reconciliation Act (Pub. L. 119-21) expanded the availability of private activity bonds for housing development. To build on this progress, Western Governors urge Congress to pass legislation providing state and tribal housing finance agencies flexibility to address changes in project plans, due to market changes or other delays, by permitting states and tribal governments to re-designate any carryforward authority and use it for either single-family or multifamily housing during the carryforward period.
6. The federal government should enable the Low-Income Housing Tax Credit (LIHTC) Program to work more effectively for underserved communities, including rural, tribal, high-poverty, and high-cost communities, as well as extremely low-income and formerly homeless tenants. Western Governors encourage the U.S. Department of the Treasury and HUD to ensure that they better preserve the nation's existing affordable housing inventory by simplifying and aligning program rules.
7. The federal government should review and adjust the formulas that determine minimum allocations granted to states for housing programs, including the Housing Trust Fund, the LIHTC Program, and the HOME Investment Partnerships (HOME) Program, to account for the high administrative and regulatory costs associated with these programs. Increased allocations would allow the states to produce more impactful projects in our states. In addition, Western Governors call for HUD to add a flat administrative fee for minimum allocation states in addition to the percentage amount for administration that is granted to them.
8. Western Governors recommend that the federal government make Federal Emergency Management Agency (FEMA) programs and Community Development Block Grant – Disaster Recovery (CDBG-DR) funds better tools for disaster relief. FEMA resources should require less documentation requirements after wildfires, given that many records are destroyed with little time for households to evacuate a fire zone. For CDBG-DR, HUD allocations should consider infrastructure needs and include additional resources to support rebuilding costs in the West.
9. Consistent with the BRAND West report recommendations, Western Governors urge the federal government, in coordination with states, to identify appropriate federal parcels for housing and evaluate opportunities to improve land transfer and disposal processes to address critical housing needs.
10. Western Governors support manufactured and modular housing and recognize the important role they play in providing affordable housing for communities, particularly in rural areas. We encourage U.S. Department of Labor (DOL) not to expand the "site of work" definition to factory-built housing for Davis-Bacon wages, as it would significantly affect the affordability of these housing options.

11. Congress should consider reauthorizing the Native American Housing Assistance and Self-Determination Act, and the federal government should also consider expanding direct funding options for tribal housing entities to address community housing needs.

C. GOVERNORS' MANAGEMENT DIRECTIVE

1. The Governors direct WGA staff to work with Congressional committees of jurisdiction, the Executive Branch, and other entities, where appropriate, to achieve the objectives of this resolution.
2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

This resolution will expire in December 2028. Western Governors enact new policy resolutions and amend existing resolutions on a semiannual basis. Please consult <http://www.westgov.org/resolutions> for the most current copy of a resolution and a list of all current WGA policy resolutions.



BUILDING RESILIENT AND AFFORDABLE NEW DEVELOPMENTS IN THE WEST

The Initiative of New Mexico Governor Michelle Lujan Grisham



Dear Friends and Colleagues,

Housing is the foundation of strong, thriving communities. Yet across New Mexico and the West, too many hardworking families lack access to affordable homes that meet their needs.

As a lifelong, twelfth-generation New Mexican, I have observed these changes firsthand. When I grew up in Santa Fe, it was a small town of about 20,000 people with just one grocery store, one pharmacy, and a handful of art galleries. Today, it is more than four times that size, with all the challenges that come with providing roads, schools, water, and services for the city's diverse and economically stratified residents. Providing enough of the right kinds of housing is a particularly challenging piece of the infrastructure puzzle in Santa Fe, as it is throughout New Mexico and the American West.

Communities need to develop, adapt, and evolve as their economies grow, but they must have the right tools to manage these transitions effectively. If we fail to keep pace with the rising demand for housing, it undermines quality of life and stunts economic growth.

That is why, as Chair of the Western Governors' Association (WGA), I am focused on expanding access to housing in the West. My 2025 Chair initiative, Building Resilient and Affordable New Developments in the West, or BRAND West, recognizes that Governors are looking for commonsense policies that help remove barriers to development, reduce costs, and leverage new resources and authorities to enable all families to meet their housing needs.

WGA operates in a way that goes beyond bipartisanship – it is truly nonpartisan. When we convene experts across industry sectors and all levels of government, and seek answers to the hardest questions, real progress happens.

This report features proven strategies from our western states, territories, and localities, as well as recommendations for the federal government to support states, territories, and local communities as they work to address the housing crisis. Through an extensive stakeholder engagement process consisting of workshops and tours in Utah and Oregon, panels at WGA's Winter Meeting in Nevada,

a public survey, a work session, and a webinar, we examined four areas where federal, local, state, and territorial governments can provide meaningful solutions that address multiple aspects of the housing crisis:

- Simplifying and streamlining housing development.
- Reducing the costs of homebuilding.
- Supporting families through initiatives that assist renters and homebuyers.
- Investing in strategic, innovative, and data-informed initiatives across the housing ecosystem.

I am grateful to my fellow Western Governors for their support of this initiative and for lending technical expertise from their states so we could learn from one another as we aim to tackle this shared challenge as a region and at the national level.

Special thanks to my Vice Chair, Utah Governor Spencer Cox, and Oregon Governor Tina Kotek for hosting workshops and housing tours in their states. I also want to thank the many stakeholders who participated in this initiative, including our initiative partners – Arnold Ventures, JPMorganChase, the National Association of Home Builders, and the Pew Charitable Trusts – for their generous support.

By following the recommendations laid out in this report, we can achieve effective, results-driven reforms and provide a foundation for Western Governors to work with our federal partners to accelerate the development of housing in the West.



Sincerely,

A handwritten signature in black ink, reading "Michelle Lujan Grisham".

Michelle Lujan Grisham
Governor of New Mexico
WGA Chair

Greetings Friends of the West,

I was born and raised in Colorado, so I have witnessed the West grow and change in myriad ways. As more people have discovered the beauty, opportunity, and promise of our region, we have seen mounting challenges and pressure points, particularly related to housing availability and affordability, that demand thoughtful and collaborative solutions.

The 2025 WGA Chair initiative of New Mexico Governor Michelle Lujan Grisham, BRAND West, reflects the commitment of Western Governors to address these challenges head-on.

Western Governors have forged the way with trailblazing legislation and bold initiatives to ensure housing is available in their states – not just for today's residents, but for generations to come. When Governor Lujan Grisham launched the BRAND West initiative last July, she was eager to hear about how her fellow Governors were addressing these issues in new and innovative ways. When Western Governors work together, they turn shared challenges into opportunities for lasting change.

WGA Chair initiatives have long embodied the Governors' ethos of collaboration and served as a valuable regional forum for exchanging knowledge, sharing ideas, and having pragmatic policy discussions that lead to meaningful, bipartisan solutions.

WGA is grateful to those who contributed to the efforts of BRAND West, whether by attending workshops in Bend, Oregon, or Salt Lake City, Utah; participating in panels at our Winter Meeting; tuning in via a webinar or livestream; or responding to our survey. A special note of appreciation to Governor Spencer Cox of Utah and Governor Tina Kotek of Oregon for hosting initiative workshops and housing tours in their states. I would also like to thank the Governors' staff for their support of the initiative as well as the WGA team for shepherding this effort across the finish line.

Housing has taken center stage nationally, capturing the attention of leaders at every level of government. In response, this report offers practical recommendations for federal action to improve housing access by focusing on four key areas: simplifying and streamlining housing development; reducing the costs of homebuilding; supporting families through initiatives that help renters and homebuyers; and investing in strategic, innovative, and data-informed initiatives across the housing ecosystem. These are collective endeavors, strengthened by Governors' participation across the West and generously supported by our sponsor community and initiative partners. We could not do this work without you.

Throughout the initiative, WGA led a robust stakeholder engagement process, bringing together local, state, and federal officials; investors and financiers; developers; think tanks; advocacy organizations; and community-based groups. Their insights and expertise are reflected throughout these pages. As your communities continue to grow and evolve, we hope this report serves as a useful resource.

I would like to extend my deepest gratitude to Governor Lujan Grisham for her outstanding leadership as WGA Chair over the past year. The findings and recommendations presented in this report will inform Western Governors' policy and drive WGA's future advocacy efforts. I look forward to continuing this critical work alongside you.



Jack Waldorf
Executive
Director
Western
Governors'
Association



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EXECUTIVE SUMMARY

New Mexico Governor Michelle Lujan Grisham, Chair of WGA, launched the BRAND West initiative in July 2024 to explore the actions needed to expand access to housing in western states and territories. Over the past year, the initiative examined strategies and policies to address housing availability and affordability and promote smart and sustainable development in communities throughout the West.

Housing shortages across the nation have reached a tipping point, driving costs to untenable levels in many communities and leaving affordable housing out of reach for a growing number of Americans. However, this crisis did not occur overnight.

Western Governors recognize that communities need quick and affordable solutions that are tailored to the West, while the region needs a whole-of-government approach to relieve short-term housing pressures and address fundamental structural issues prevalent in the housing market. In each area of focus, this

report elevates best practices and case studies across western states and territories and provides actionable recommendations for Congress and the federal government. The initiative is organized under four key pillars of housing access:

- **Simplifying and streamlining housing development.** Best practices from our western states include the modernization of land use regulations, expedited plan and permit review processes, and support for manufactured and modular homes. The federal

government can advance these efforts by expanding programs like the U.S. Department of Housing and Urban Development's (HUD) Pathways to Removing Obstacles to Housing (PRO Housing) Program, revisiting requirements for federally funded infill housing projects, and eliminating outdated regulations that hinder the adoption of manufactured and modular housing.

- **Reducing the costs of homebuilding.** Western states and territories have shown leadership in this area by creating targeted tax credit and funding programs. The federal



government can contribute to this goal by expanding and creating tax incentives and evaluating the costs of federal housing regulations.

- **Supporting families through initiatives that help renters and homebuyers.** Western states and territories have instituted a number of programs to increase access to rental homes and support homeownership. The federal government's role may include improving rental assistance and enhancing programs that provide pathways to homeownership.
- **Investing in strategic, innovative, and data-informed initiatives across the housing ecosystem.** Recognizing that housing challenges do not exist in a bubble, initiatives in western states and territories are focusing on capacity-building and workforce development programs, sustainability and resilience efforts, enhanced cooperation, and expanded access to publicly

owned parcels of land. The federal government can support these efforts by strengthening the skilled construction workforce, funding community resilience programs, promoting interagency coordination, and increasing opportunities for the smart and responsible development of appropriate federal parcels.

The work by Western Governors highlighted in this report illustrates the unique nature of the challenges each community is facing and, as a result, how critical it is that the solutions are tailored appropriately. As the federal government considers the following recommendations, we encourage Congress and federal agencies to recognize these differences and provide maximum flexibility to allow states, territories, and localities to implement housing and workforce solutions in the ways that best meet the needs of their communities.

This report is the culmination of an extensive partner engagement process with participation from experts across the region, industry sectors, and levels of government. With the leadership and support of Western Governors Spencer Cox and Tina Kotek, WGA convened regional workshops and facilitated tours of innovative housing developments in Salt Lake City, Utah, and Bend, Oregon. The WGA 2024 Winter Meeting included panel discussions on housing issues, and WGA hosted a virtual webinar and state and territorial work session in support of the initiative. WGA also conducted a public survey to gather additional information on housing challenges and solutions. These events brought together local, state, and federal decision-makers; investors and financiers; developers; companies; think tanks; advocacy groups; and community-based organizations whose expertise and input were crucial to developing the findings and recommendations contained in this report.



SIMPLIFYING AND STREAMLINING HOUSING DEVELOPMENT

THE CHALLENGE: Zoning and land use laws are too complex, blocking and slowing housing development.

THE SOLUTION: States and localities have created legislative packages to reform zoning and land use laws to make housing developments faster and easier, while removing rules that discourage density and residential development.

Innovation: Oregon's Statewide Land Use and Middle Housing Legislation

► **What they did:** Oregon required all cities and counties to adopt comprehensive land use plans and zoning ordinances in 1973, which led to the first state law to guarantee the right of property owners to build missing middle housing on any residential lot in 2019. Oregon's land use system now preserves vast areas for farm and forest production, protects habitat, and conserves natural resources while allowing for the planning and development of homes and businesses and increased density to meet growing demands.

Innovation: Arizona's Model Zoning Legislation

► **What they did:** The Arizona Legislature and Governor Katie Hobbs passed a suite of legislation that established "shot clocks" for housing approvals, mandated cities to expand options for multifamily developments, permitted accessory dwelling units (ADUs), and increased housing density.

Innovation: The Montana Miracle

► **What they did:** Montana enacted a package of comprehensive zoning and land use bills in 2023, adopting many of the recommendations from Governor Greg Gianforte's bipartisan housing task force, which focused on free market solutions and streamlining regulations.

Innovation: Colorado's Strong Communities Grant Program

► **What they did:** After providing planning funds to adopt local policies and strategies to support housing development, as well as funding for affordable housing, Colorado passed a suite of laws designed to increase housing density and discourage frivolous litigation.

Innovation: Hawai'i's Housing Preservation Legislation

► **What they did:** In 2024, Hawai'i passed landmark housing bills into law, allowing counties the power to phase out short-term rentals, preserving critical housing stock for residents, and requiring all counties in the state to adopt or amend ordinances to allow for ADUs.

Innovation: Co-Living and Micro-Community Initiatives

► **What they did:** Co-living helps decrease the costs of adaptive reuse for office buildings, which may make it a more feasible option to address housing supply constraints. At the state level, Washington and Oregon have legalized micro-units where multi-family housing is permitted by zoning code. Hawai'i has prohibited any requirements more stringent than the International Building Code for adaptive reuse and has allowed for adaptive reuse of vacant commercial buildings. At the local level, Salt Lake City has waived certain requirements to allow for adaptive reuse.

Innovation: Realize Las Cruces Ordinance in New Mexico

► **What they did:** The Realize Las Cruces Development Code features increased housing densities, regular updates to zoning documents, greater flexibility in building height and carport designs, increased flexibility in site designs for expanded housing opportunities, adoption of multimodal transportation standards, and an emphasis on Metropolitan Redevelopment Area sites.





THE CHALLENGE: Government permitting and approval systems are too slow and complicated.

THE SOLUTION: Western state and local governments have demonstrated the value of strategic reviews of permitting and approval systems, which weed out duplication and unnecessary administrative burdens.

Innovation: Hawai'i's Emergency Proclamation Relating to Affordable Housing

► **What they did:** The proclamation provides a streamlined process for affordable housing projects on land owned by state and local governments to receive certain environmental review, zoning, parking requirement, fee, and density exemptions. The proclamation also provides certain impact fee waivers to provide financial relief for affordable housing projects amidst the high-interest rate environment.

Innovation: By-Right Multifamily Housing Development

► **What they did:** California, Montana, and Hawai'i have adopted multifamily housing by right in commercial zones widely, while Arizona has adopted certain components. Colorado has adopted a related policy based on proximity to transit. Using this right, housing projects can proceed without discretionary review and approval if they comply with all applicable laws and regulations.

Innovation: Montana's Streamlined Public Comment Period

► **What they did:** State legislation requires cities with 5,000 residents or more, within a county of 70,000 people or more, to adopt a land use plan that integrates public participation early in the planning process and streamlines municipal decisions, such as permitting.

Innovation: Washington's Contract Hearing Examiners

► **What they did:** Washington allows cities and counties to hire or contract hearing examiners to approve preliminary plans and amendments to zoning ordinances and manage the community engagement process.



THE CHALLENGE: Although technology for manufactured and modular homes has advanced tremendously, the rules for these homes remain a barrier.

THE SOLUTION: Regional agreements have the potential to standardize requirements and promote the wider-scale adoption of modular housing.

Innovation: Multi-State Reciprocity Agreements

► **What they did:** Currently, Idaho, Washington, and Oregon have a reciprocity agreement that allows manufacturers located in these three states to receive shared plan review and inspection services.

Innovation: South Dakota's DakotaPlex Program

► **What they did:** The DakotaPlex Program addresses the need for affordable multifamily housing in rural communities while imparting construction skills to prison inmates at the Mike Durfee State Prison in Springfield. Designed as two- and three-bedroom units, DakotaPlex homes can be configured as duplexes, triplexes, or quadplexes, providing flexible solutions for various community needs.



IDEAS WORTH EXPLORING

- States may develop model zoning and land use codes that localities are incentivized to adopt to receive state funding for housing projects. This could preserve local autonomy while ensuring that funds are deployed in a timely fashion.
- State and local governments may fully maximize the benefits of technology and AI to streamline parts of the permitting process, including adopting digital permitting systems and video inspections where appropriate.
- States may provide incentives to encourage local jurisdictions to offer increased density allowances to developers in exchange for deed-restricted housing units reserved for the local workforce.



RECOMMENDATIONS FOR FEDERAL ACTION

- Congress should continue supporting communities in removing barriers to housing development by increasing funding for the PRO Housing Program.
- Congress should revisit National Environmental Policy Act (NEPA) requirements for all infill housing development on parcels outside sensitive or protected areas.
- Congress should remove the HUD Code requirement for manufactured homes to sit on a permanent chassis.



REDUCING THE COSTS OF HOMEBUILDING

THE CHALLENGE: Financing tools that incentivize affordable housing development and preservation are effective, but we need more of them.

THE SOLUTION: States and territories are moving beyond administering federal programs and funding to develop and implement their own statewide programs and policies focused on development and preservation.

Innovation: State Low-Income Housing Tax Credits

► **What they did:** Eleven western states have established a state Low-Income Housing Tax Credit (LIHTC) to generate more private investment and fill financing gaps in affordable housing. Many states build upon the federal LIHTC to simplify the process and enhance the impact of these credits. Some states have also bifurcated their state credit from the federal credit, meaning that two different entities can invest in the same project, which helps increase flexibility and maximize use.

Innovation: Utah Homes Investment Program

► **What they did:** In 2024, Governor Cox signed into law an innovative program offering low-interest loans to developers to increase the supply of attainable starter homes across the state – particularly for teachers, first responders, and veterans. Through the program, builders who designate at least 60 percent of units in an owner-occupied housing project as “attainable” are eligible for loans with interest rates as low as 3 or 4 percent.

Innovation: Nevada’s Growing Affordable Housing Program 2.0 and Housing Access and Attainability Act

► **What they did:** The state provides subordinate financing by leveraging private financing partners. The pilot program loan was comprised of \$3 million from the Nevada Division of Housing at 3 percent simple interest, blended with \$2 million from a Community Development Financial Institution (CDFI) at 7 percent interest, bringing the project total to \$5 million. With this proof of concept, Nevada passed the Nevada Housing Access and Attainability Act during the 2025 legislative session, with \$133 million for loans or collateral for both affordable and attainable housing.

Innovation: Arizona’s Financing Package

► **What they did:** Arizona offers state tax credits, subsidies, and low-interest loans to developers building affordable housing. The state limits projects to competing in a single set-aside category, and new construction awards to one per county with the potential for a second award. Arizona also prioritizes awards for nonprofits or Choice Neighborhood recipients, encourages affordable and rapidly deployable alternative housing options, and offers incentives to developers who build in rural, underdeveloped, and tribal areas, including designated set-asides. Additional incentives are allotted to owners who participate in housing assistance programs and commit to serving certain at-risk populations.

Innovation: Colorado’s State Affordable Housing Fund

► **What they did:** Voters approved a ballot measure in 2022 to provide approximately \$300 million in grants and loans to nonprofit agencies, community land trusts, nonprofit and for-profit developers, and local governments that make commitments to increase affordable housing stock.

Innovation: New Mexico’s Housing Investments

► **What they did:** New Mexico has allocated record funding in recent years with over \$400 million in the 2024 and 2025 legislative sessions. The funding is directed toward housing needs and homelessness interventions. It also creates a new \$125 million Opportunity Enterprise Housing Development Program designed to serve families left out of traditional affordable housing program qualifications.





THE CHALLENGE: The cost of building homes has skyrocketed, in part due to outdated policies and a lack of proactive strategies.

THE SOLUTION: By examining the underlying pressures that increase the cost of housing, all levels of government can contribute to cost reduction.

Innovation: New Mexico's Site Readiness Act and Investments

► **What they did:** Governor Lujan Grisham and the legislature included infrastructure development in the \$110 million appropriation to housing initiatives in the 2025 legislative session. The innovative Economic Development Site Readiness Act also expressly included housing availability in the site characterization studies that will occur across the state as a precursor to certifying properties as “strategic economic development sites.” The Site Readiness Act was coupled with \$24 million over three years to fund these predevelopment activities.

Innovation: Community Land Trusts

► **What they did:** Community land trusts use deed restrictions or renewable land leases to ensure that homes remain permanently affordable, meaning that the down payment assistance and funding invested in the first purchase are not lost, even when homes are sold. Nonprofits, for-profit developers, cities, and counties are using deed restrictions creatively to maintain affordability.



IDEAS WORTH EXPLORING

- Regional purchasing cooperatives for common goods and services needed for all housing projects may reduce both the time and expense of local and state procurement regulations.
- Innovation is key to supporting the development of new building materials and technologies that are more cost-effective and sustainable. States may work with universities and other research partners to ensure this research is adequately funded.
- Strategies may leverage employer and workforce-related capital to support the development and preservation of affordable housing. These investments may be structured as long-term capital, low-interest loans, or construction financing, all aimed at improving housing access for workers.
- States may consider enabling local governments to offer property tax exemptions to developers in exchange for the creation or preservation of income-restricted housing.



RECOMMENDATIONS FOR FEDERAL ACTION

- Congress should enact programmatic changes to maximize the use of the LIHTC Program. To enhance the effectiveness of LIHTC in rural communities, Congress should allow multiple development sites to qualify as a single project and streamline requirements associated with multi-site development. Existing Governors' policy on LIHTC is included below.
- Congress should appropriate sufficient resources to finance housing options in rural areas, and the federal government should promote flexibility within these programs wherever possible.
- Congress should create a tax credit for the development and preservation of attainable single-family housing in low-income areas.
- Congress should ensure adequate appropriations for housing block grants to state and local governments, recognizing the important role they play in the affordable housing landscape.
- Congress should create a dedicated preservation financing tool, such as a tax incentive, to preserve and rehabilitate the existing housing stock.
- The National Park Service (NPS) should update the guidance for historic preservation tax incentives to allow multifamily housing.
- If Congress reauthorizes Opportunity Zones, changes should be made to more effectively integrate the incentive with existing efforts to increase housing availability and maximize its benefits by improving program flexibility and requiring specific outcome-based metrics for housing.
- HUD and other federal agencies should provide predevelopment resources for housing. Congress should ensure that predevelopment support is included in program design and appropriations.
- HUD and the U.S. Department of Agriculture (USDA) should carefully consider how new standards, codes, and requirements will affect the cost of housing financed by the agencies and provide flexibility in implementation where appropriate.
- Congress should allow exemptions to Davis-Bacon and Related Acts (Davis-Bacon) if prevailing wage rates are less than the minimum wage in a jurisdiction.



SUPPORTING FAMILIES THROUGH INITIATIVES THAT HELP RENTERS AND HOMEBUYERS

THE CHALLENGE: Building new housing is critical to bringing down costs, but it is not always enough to make housing attainable.

THE SOLUTION: Western states and localities have created programs akin to the successful pandemic-era federal rental assistance and eviction prevention programs.

Innovation: Washington's Eviction Prevention Rental Assistance Program

► **What they did:** The Eviction Prevention Rental Assistance Program provides funding to help families with rent. This includes rental arrears and future rent if needed to stabilize the applicant's housing and prevent their eviction, as well as utility assistance for households to prevent an eviction.

Innovation: Portland, Oregon's Eviction Legal Defense Program

► **What they did:** In partnership with the Oregon Law Center, Portland Community College's Legal Resource Center, Metropolitan Public Defenders, and United Way of the Columbia-Willamette, the Portland Housing

Bureau offers an Eviction Legal Defense Program to provide free legal support to tenants facing eviction. The program is available to Multnomah County residents who are facing eviction and who earn 60 percent or less of the area median income (AMI).

Innovation: Boulder, Colorado's Eviction Prevention and Rental Assistance Services

► **What they did:** The program expands legal and financial services for those facing eviction. The program helps people resolve eviction-related housing issues through legal services, rental assistance, and mediation. Tenants can seek these free legal services as soon as they receive a Notice of Termination and do not need to wait until an eviction case is filed.

THE CHALLENGE: Homeownership remains a primary goal in affordable housing strategies, even as speculative ownership continues to drive housing prices above sustainable levels.

THE SOLUTION: To counteract this phenomenon, as well as to combat wage stagnation, all levels of government have initiated programs to create more pathways to homeownership.

Innovation: Arizona is Home

► **What they did:** Arizona is Home is an initiative for low- and moderate-income first-time homebuyers. Funding is available for down payment assistance, interest rate buydown, and closing costs as a silent second mortgage due on sale, with up to \$30,000 for those making less than 80

percent AMI and up to \$20,000 for 81 to 120 percent AMI. Its Mortgage Assistance Program offers below-market 30-year fixed interest rates with a 4 percent down payment and closing cost assistance to homebuyers with incomes of less than 80 percent AMI in rural counties.





IDEAS WORTH EXPLORING

- States may explore opportunities to enable low-income homeowners to successfully sustain homeownership over the long term. This could include expanding homebuyer education programs and housing counseling services to support prospective homebuyers through the process; creating assistance programs for home modifications and repairs; and tax relief.
- Providing protections against the displacement of renters is key, and states and localities may consider policies that prioritize keeping renters in their homes. For example, states and localities may adopt right of first refusal policies that give tenants the option to purchase their building.
- Access to mortgage financing remains a challenge for prospective homebuyers. A potential solution may be to use alternative underwriting criteria, such as rental payment history, utility bills, and car payment history.
- State and local governments may support nonprofits that promote cooperative land ownership in manufactured and mobile home communities to enhance stability and resident control.



RECOMMENDATIONS FOR FEDERAL ACTION

- HUD should simplify administrative and operational requirements for rental assistance to improve landlord engagement and Housing Choice Voucher (HCV) utilization.
- HUD should reassess and update the data sources for Fair Market Rent (FMR) determinations to ensure that the HCV Program provides accurate voucher amounts to western residents.
- HUD should remove barriers and provide resources and incentives to public housing agencies to deploy the Family Self-Sufficiency Program.
- Congress should decouple USDA mortgages from rental assistance and permanently authorize a stand-alone rental assistance program.
- Congress should eliminate the LIHTC qualified contract loophole so that affordable housing stays affordable for the full intended period.
- Federal agencies should improve educational opportunities for first-time homebuyers and create a “one-stop shop” that consolidates information about down payment assistance programs and other resources.
- HUD should incentivize public housing authorities to strengthen and better integrate homeowner assistance into their program offerings.
- The federal government should update underwriting criteria and requirements to increase the effectiveness of different factors in enhancing the ability to attain mortgages while still insuring against risk.
- Congress should modify the methodology from the Home Investment Partnerships Program’s (HOME Program) homeownership value limits to align with other federal programs.
- The federal government should examine innovative homeownership and mortgage structures.
- The federal government should examine potential solutions to growing insurance challenges in collaboration with states and other key partners.



INVESTING IN STRATEGIC, INNOVATIVE, AND DATA-INFORMED INITIATIVES ACROSS THE HOUSING ECOSYSTEM

THE CHALLENGE: Housing development is also constrained by a significant shortage of construction workers and a lack of capacity, slowing the pace of new projects and increasing costs each year.

THE SOLUTION: Addressing the skilled labor shortage and improving housing development capacity will remove barriers to building more homes.

Innovation: New Mexico's Executive Order on Climate Ready and Infrastructure Workforce

► **What they did:** In 2024, Governor Lujan Grisham issued Executive Order 2024-152 to address the urgent need for a skilled infrastructure and climate-ready workforce in New Mexico. The Executive Order identifies the goal for Partnership Agencies to collectively facilitate and support the training of 2,000 workers in infrastructure and climate-ready professions by December 31, 2026.

Innovation: Oregon's General Housing Account Program – Capacity Building

► **What they did:** The program provides grants, training, and technical assistance opportunities to help build capacity in individuals, organizations, geographic regions, and systems toward the development and sustainable operation of affordable multifamily rental housing. In addition, the Oregon Centralized Application Capacity Building Grant helps organizations that currently – or have taken documented steps to – develop, preserve, or operate affordable rental housing by providing funds for a variety of capacity-building activities.





THE CHALLENGE: Affordable housing development does not always reflect the challenges of sustainability and resilience.

THE SOLUTION: By building environments where people can thrive, community resilience ameliorates the effects of many disasters and emergencies.

Innovation: International Wildland-Urban Interface Code

► **What they did:** Designating high-risk areas like the wildland-urban interface and following associated codes in these areas help guide housing development decisions. California, Montana, Nevada, Utah, and Washington have adopted the International Wildland-Urban Interface Code, or aspects of the code, at the state level.

Innovation: Northern Mariana Islands' Resilience Programs

► **What they did:** To reduce barriers and promote resilience, the Northern Marianas Housing Corporation emphasizes operational efficiency and sustainable practices. The agency has modernized its housing stock by completing 132 resilient homes post-Super Typhoon Yutu with a goal of 300 homes by 2026.

Innovation: Colorado's Wildfire Resiliency Code Board

► **What they did:** Colorado is investing in proactive risk reduction measures, including this Board that helps enhance community safety and resiliency from wildfires through the development and local adoption of model codes and standards tailored to Colorado.



THE CHALLENGE: Housing efforts are often siloed among multiple departments and agencies.

THE SOLUTION: Western states are focusing on cooperation and coordination to dissolve silos and maximize resources.

Innovation: Utah's Commission on Housing Affordability

► **What they did:** The Commission on Housing Affordability brings different individuals, organizations, and sectors to the table to discuss housing issues and potential policy recommendations for the legislature. More than 65 bills have been passed since its creation due to the months of careful coordination and consensus-building before each legislative session.

Innovation: Arizona Governor's Interagency and Community Council on Homelessness and Housing

► **What they did:** In 2023, Governor Hobbs reinstated the Governor's Interagency and Community Council on Homelessness and Housing, which brings together public, private, nonprofit, faith-based, and lived-experience perspectives to collaboratively develop and implement solutions to homelessness and housing insecurity.

Innovation: New Mexico's Office of Housing

► **What they did:** In 2024, Governor Lujan Grisham established an Office of Housing through executive authority to work on systems-level issues focused on decreasing the cost of new housing and ending the shortage of over 40,000 housing units that the state is currently facing.

Innovation: Northern Mariana Islands' Consolidated Plan

► **What they did:** The Commonwealth of the Northern Mariana Islands' comprehensive approach includes drafting a five-year Consolidated Plan that integrates public comments to reflect resident needs, ensuring alignment with long-term goals like redevelopment and modernization of the housing stock. By fostering public-private partnerships and leveraging funding such as LIHTCs and the HOME Program, the Northern Marianas Housing Corporation supports a variety of housing solutions, including rental assistance and homeownership opportunities.

Innovation: Wyoming's Statewide Needs Assessment and Housing Plan

► **What they did:** In 2024, the Wyoming Community Development Authority published its Statewide Housing Needs Assessment, which provided analyses of both statewide and regional housing challenges. Building on these findings, it released the Wyoming Statewide Strategic Housing Action Plan in January 2025, which outlined the stakeholders shaping Wyoming's housing landscape, proposed strategies to address housing challenges, and emphasized the importance of local autonomy.

Innovation: South Jordan, Utah's Master Development Agreement

► **What they did:** Daybreak in South Jordan, Utah, features a master development agreement for the community, designed with enough flexibility to respond and adapt to market conditions over time. This plan, along with by-right entitlement granted by the City of South Jordan, provides a principle-based approach and a strategy for intentional growth.





THE CHALLENGE: Publicly owned parcels that may not have other strategic purposes or intrinsic values are not readily available for housing development.

THE SOLUTION: By identifying and opening appropriate publicly owned parcels to responsible housing development, all levels of government can make a key contribution to the housing crisis.

Innovation: Hawai'i's Public-Private Partnerships

► **What they did:** Streamlining state requirements has allowed Hawai'i to push forward its initiative to build housing on state-owned lands suitable for housing development. Hawai'i has over 24,000 new housing units across 73 projects planned on state-owned lands, the majority of which are in transit-oriented development areas. The public-private partnership aims to transform lower-density public housing sites that are in dire need of capital improvements into vibrant, denser, mixed-income communities.

Innovation: Colorado's Public-Private Partnership Unit

► **What they did:** Colorado is building up a state Public-Private Partnership Unit to identify and leverage underutilized and vacant State Land Board properties into valuable community assets for affordable and workforce housing development (S.B. 22-130).

Innovation: Nevada's Public Land Management Program

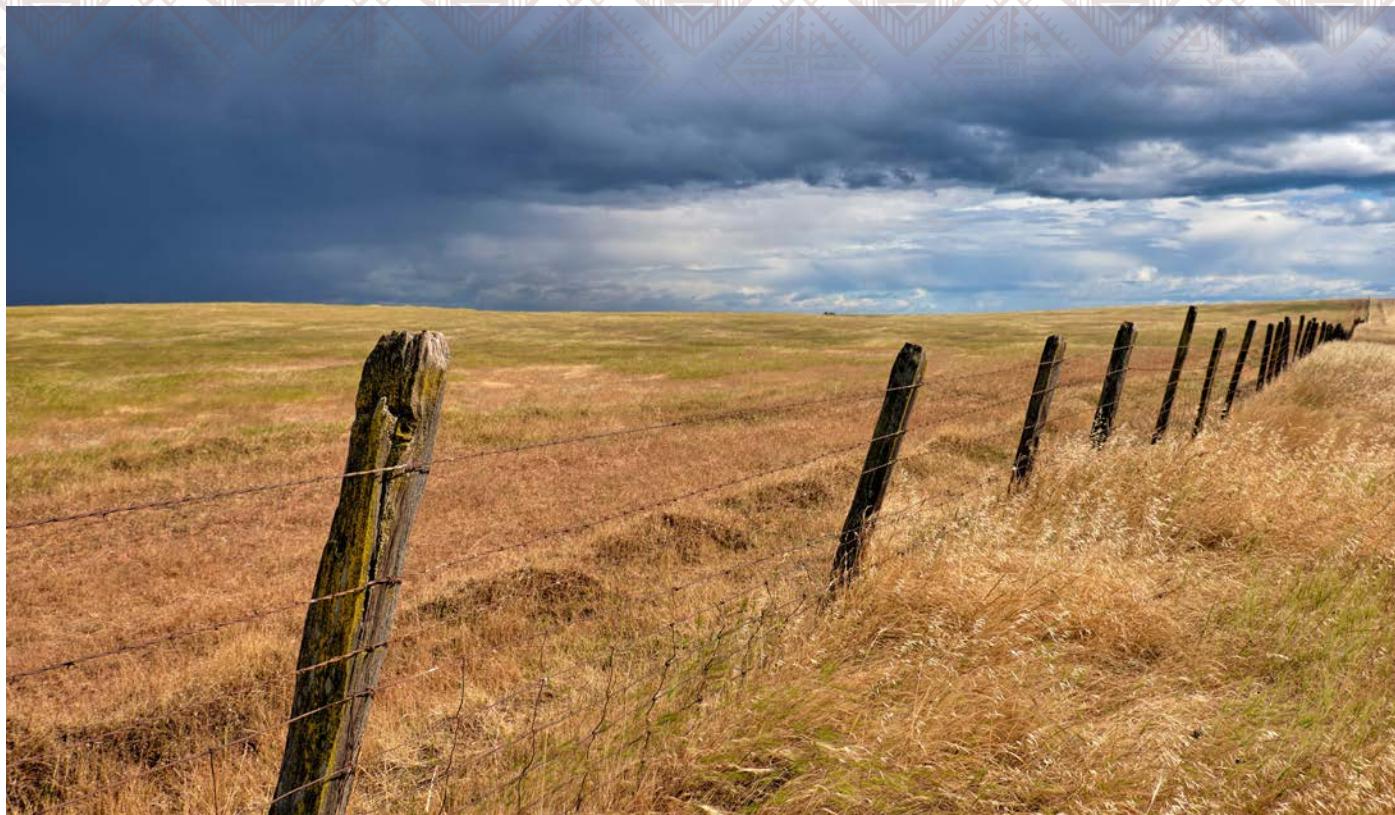
► **What they did:** The Southern Nevada Public Land Management Act of 1998 provides examples of how federal land being transferred to state, local, tribal, or private ownership can be compatible with protecting valuable public assets, supporting conservation efforts, and meeting critical community needs.



IDEAS WORTH EXPLORING

- Congress and states may explore new tax incentives and credits for developers building on public land to ensure long-term affordability for the housing they build and maximize the public value of these projects.
- States may finance regional housing needs assessments to support data-driven insights that inform planning and policy decisions related to current and future housing needs.





RECOMMENDATIONS FOR FEDERAL ACTION

- HUD and other federal agencies should provide technical assistance, capacity-building, and data collection and reporting resources for housing. Congress should ensure that these types of support are proportionately reflected in program design and appropriations.
- Congress should support the expansion of education and skills training for the construction workforce, including apprenticeships, and career and technical education.
- Congress should account for return-on-investment calculations in program design and appropriations and allocate a greater proportion of funding towards community resilience and mitigation efforts. Congress should ensure that home hardening and retrofitting are allowable uses of federal resources. In existing policy, Western Governors call for federal legislation that considers the important role of pre-disaster mitigation.
- The federal government should break down silos and promote interagency coordination and collaboration to maximize the impact of housing efforts. Congress should capitalize on opportunities wherever possible and appropriate to ensure that new programs and investments in workforce, infrastructure, and other areas can be used with existing housing programs and funding streams.
- Congress should pursue statutory changes to streamline the process of transferring appropriate federal parcels to states, communities, and developers to address housing shortages while maintaining essential guardrails and protecting critical public assets.
- Congress should consider legislation to allow agencies beyond the U.S. Forest Service to lease certain federal lands for affordable housing used by federal employees and the local workforce. Existing Western Governors' policy encourages Congress to address workforce housing needs, particularly in rural and resort areas.
- Congress and the Federal Transit Administration (FTA) should streamline regulations for transit-oriented housing development projects and explore other creative land transfer opportunities for affordable housing development.



BACKGROUND AND WESTERN STATE INNOVATIONS

Over the past few decades, housing development has failed to keep pace with demand, resulting in chronic underbuilding. Between 1968 and 1977, the U.S. built over 16 million new homes; between 2010 and 2020, the U.S. built fewer than 10 million. That decline has been even more acute with respect to starter homes, which accounted for 40 percent of new construction in the early 1980s, but just 7 percent of housing construction in 2019. Freddie Mac estimates a nationwide shortfall of 3.8 million housing units. Perhaps the most significant factor contributing to today's housing shortages is the sharp curtailment of development starting in 2007 with the Great Recession. During that time, new home construction fell to its lowest point since the 1960s and has yet to recover. Additionally, communities continue to lose affordable housing stock due to market forces and unmet repair needs.

Population growth is another challenge, and one that is particularly acute in the West. The region welcomed more than 78 million new residents from 2010 to 2020 – a population growth rate of 9.2 percent, the second highest in the nation. The three fastest-growing states by percentage – Utah, Idaho, and Colorado – are all western states. In addition, towns with fewer than 5,000 people in the Mountain West and along the

West Coast experienced the highest nationwide population growth rates at 13.3 percent. States and communities are still adapting to these mounting growth pressures and intensified housing demand. In 2022, six of the ten states in the U.S. with the biggest gaps between housing needs and availability were in the West, with housing deficits spreading rapidly to the suburbs and small towns.

Urban centers and rural areas alike are grappling with the social, economic, and environmental implications of inadequate access to housing for their residents and local workforce. Housing is a cornerstone of prosperity and well-being, affecting poverty, health, stability, economic mobility, and the environment. Expanding access to housing can help address many interrelated issues facing western states.



Simplifying and Streamlining Housing Development

Public and private developers in the housing sector voice one concern, almost universally: governments at all levels have made it too difficult and too slow to build more housing. Onerous and inefficient regulations at the local, state, and federal levels have further stifled development, increased costs, and limited housing options.

Zoning and Land Use Reform

Oregon's Statewide Land Use and Middle Housing Legislation

Oregon was one of the first states in the nation to enact a comprehensive, statewide land use and zoning system with the passage of S.B. 10 in 1969 and S.B. 100, the Oregon Land Use Act, in 1973. S.B. 10 provided the foundation for Oregon's unprecedented land use system. The Act required all cities and counties to adopt land use plans and zoning ordinances to implement those plans by the end of 1971. The Governor assumed authority to plan and zone for any jurisdiction that did not comply. S.B. 100 maintained the local planning and zoning mandates and authorized a new state agency – the Land Conservation and Development Commission – to adopt statewide planning goals as standards for local governments and enforce compliance. The unique and effective method of implementation allowed local governments to amend their codes with parameters, goals, support, and funding from the state. State leadership and partnership played a significant role in changing the local political dynamic, promoting statewide collaboration, and helping local governments and developers address barriers to housing.

The system now preserves vast areas of land for farm and forest production, protects habitat, and conserves natural resources, while allowing for the planning and development of land for homes and businesses to meet

Initiative Convenings

Under the leadership of Governor Lujan Grisham, the BRAND West initiative held convenings to examine strategies to expand access to housing in western states. BRAND West served as a valuable regional forum to exchange knowledge and ideas on housing interventions. WGA conducted a robust partner engagement process, with subject matter experts representing a broad range of sectors, consisting of a public survey, regional workshops, tours, panels at the WGA Winter Meeting, a webinar, and a state and territorial work session.

► **Salt Lake City, Utah Workshop** [Page 23](#)

► **Bend, Oregon Workshop** [Page 26](#)

► **Rethinking Rental Policy Webinar** [Page 31](#)

growing demands. It has prompted further conversations about growth and enabled the state to build and expand upon these efforts through other legislation, including the Large Cities Middle Housing Model Code (H.B. 2001), the first state law to guarantee the right of property owners to build missing middle housing – duplexes, triplexes, quadplexes, cottage clusters, and townhouses – on any residential lot. State stakeholders attribute the success of the legislation to a strong state-local relationship, established by the long-standing land use program; a diverse advocacy coalition, including homebuilders, realtors, tenants' organizations, environmentalists, transit advocates, affordable housing providers, and developers; and an even playing field, applying the new requirements to cities regardless of size.

Arizona's Model Zoning Legislation

Arizona's model suite of legislation, passed and signed by Governor Hobbs during previous legislative sessions, includes:

- S.B. 1162, which establishes "shot clocks" for municipal zoning application reviews and mandates cities with over 30,000 residents to submit housing production data to the Arizona Department of Housing every five years;

- H.B. 2297, which mandates cities with populations over 150,000 to establish objective standards allowing multifamily or adaptive reuse in up to 10 percent of existing commercial, office, and mixed-use buildings without discretionary approvals like conditional use permits or rezoning. These standards must include a 10 percent set-aside for low- and moderate-income housing for at least 20 years;
- H.B. 2720, which permits ADUs in cities over 75,000 in population to boost single-family zone density and expand smaller housing options. Statewide, the law preempts certain local ADU regulations, such as parking, design, and some size limits; and
- H.B. 2721, which increases housing density in single-family zones by allowing missing middle housing in cities over 75,000 in population. This legislation streamlines multifamily development by reducing certain local requirements (e.g., stricter reviews, some size limits) within one mile of the central business district and in at least 20 percent of new, larger housing developments.



The Montana Miracle

Dubbed the “Montana Miracle,” the state passed a package of trailblazing housing, zoning reform, and land use bills championed by Governor Gianforte during the 2023 legislative session:

- S.B. 382, which requires municipalities over a certain population threshold to develop land use plans on how to meet long-term housing needs and cities to implement at least 5 regulatory changes from a list of 14 proposed changes to increase housing supply;
- S.B. 323, which allows duplexes to be built wherever there is single-family housing for municipalities of more than 5,000 residents;
- S.B. 245, which allows multifamily residential and mixed-use buildings in areas zoned for commercial use;
- S.B. 528, which stipulates that ADUs must be permitted without regulations such as parking minimums;
- S.B. 407, which eliminates design review by external boards;
- H.B. 246, which allows cities and towns to create zones that allow tiny homes; and
- H.B. 211, which streamlines the subdivision review and approval process.

Montana did not achieve this outcome overnight. Governor Gianforte issued an executive order in July 2022 forming a bipartisan housing task force chaired by the head of the Department of Environmental Quality with broad participation from state officials, home builders, city planners, county commissioners, and nonprofit leaders. The Governor’s objective was to focus on consensus-building, free market solutions, and streamlining regulations. Many of the task force’s recommendations were passed into law within a year with bipartisan support, and the task force was extended through 2025 to develop additional recommendations.



At WGA’s 2023 Western Prosperity Forum, Governor Gianforte discussed a slate of bills he recently signed to overhaul housing mandates and zoning regulations, encourage the development of denser housing, and streamline permitting reviews.

Colorado’s Strong Communities Grant Program

Over the past few years, Colorado has taken several ambitious steps to expand housing opportunities and preserve affordable housing units. The Strong Communities Program provided planning funds to adopt local policies and strategies to support housing development, as well as funding for affordable housing (H.B. 22-1304). In the 2024 legislative session, Governor Jared Polis built on this success and led an effort to pass a package of housing and land use reform bills:

- S.B. 24-174, which requires robust housing needs assessments, strategic planning to better understand infrastructure constraints, and enhanced regional cooperation in urban areas and other fast-growing areas of the state, as well as providing grants for locals to carry out this work;
- H.B. 24-1007, which prohibits local governments from enforcing occupancy restrictions based on familial relationships;
- H.B. 24-1107, which requires courts

to award reasonable attorney’s fees to a local government defendant who prevails in a land use case not involving the development applicant, which will reduce frivolous lawsuits that delay housing development;

- H.B. 24-1304, which prohibits local governments in the Front Range from adopting or enforcing minimum parking requirements near certain transit service areas;
- H.B. 24-1152, which requires local governments in the Front Range to allow ADUs without long-term owner occupancy restrictions or new parking construction while providing state funding to support financing options and reduce infrastructure costs; and
- H.B. 24-1313 and H.B. 24-1434, which require local governments in the Front Range to analyze their zoning capacity near certain transit areas and increase their zoning density to meet housing opportunity goals that support affordable housing development and transit ridership while providing state funding for affordable housing tax credits and grants to reduce infrastructure constraints.



Hawai‘i’s Housing Preservation Legislation

In the 2024 legislative session, Hawai‘i Governor Josh Green signed landmark housing bills into law. Act 17 allows counties the power to phase out short-term rentals, preserving critical housing stock for residents. Act 39 requires all counties in the state to adopt or amend ordinances to allow for at least two ADUs on residentially zoned lots in urban areas, subject to the availability of infrastructure.

Co-Living and Micro-Community Initiatives

Amid urgent housing needs and all-time-high office vacancy rates, policymakers at the state and local levels are exploring ways to convert underused commercial spaces to residential units and revitalize downtowns, including co-living models. Co-living helps decrease the costs of adaptive reuse for office buildings, which may make it a more feasible option to address housing supply constraints. The cost per unit is 25 to 35 percent less expensive than either new-build apartments or office-to-regular apartment conversions, where the kitchen and the bathroom are inside the unit, largely due to the centralization of plumbing.

At the state level, Washington and Oregon have legalized micro-units where multifamily housing is permitted. Hawai‘i has prohibited any requirements more stringent than the International Building Code for adaptive reuse. In addition, Hawai‘i’s Act 37 allows for adaptive reuse of vacant commercial buildings by allowing residential uses in commercial zones and amending local ordinances to facilitate the adaptive reuse of commercial buildings. Additionally, some states are examining tax incentives, even for market-rate housing, to encourage adaptive reuse.

Cities like Salt Lake City have waived local requirements, allowing residential uses in commercial zones, easing

design guidelines, and eliminating parking minimums. Salt Lake City has also created a tiered system that promotes flexibility for use based on the age of the building and its historic value.

Realize Las Cruces Ordinance in New Mexico

Local governments have also led the way in re-examining their processes and procedures to enable faster and easier housing development. For example, the City of Las Cruces in southern New Mexico passed the Realize Las Cruces Development Code in 2025. The Code features increased housing densities to address shortages in the current housing inventory, regular updates to zoning documents, greater flexibility in building height and carport designs, increased flexibility in land uses and site designs for expanded housing opportunities, adoption of multimodal transportation standards, and an emphasis on growth and redevelopment in Metropolitan Redevelopment Area sites.

In addition, the Code includes a technical manual to increase efficiency for the design process, so future updates to the Code can be completed in a timely manner.

Streamlined Processes

Housing development requires the navigation of a variety of state and local systems, from inspections and permits to community engagement and discretionary review processes. State and local governments are often saddled with systems that evolved organically, responding to the challenges of specific moments over decades. Western state and local governments have demonstrated the value of the strategic review of these systems, which weeds out duplication and unnecessary administrative burdens. Action is needed to reduce burdensome requirements at the federal level as well.

Hawai‘i’s Emergency Proclamation Relating to Affordable Housing

Hawai‘i provides exemptions from state environmental review requirements for affordable housing projects under certain circumstances, which could serve as a model for federal reforms to provide categorical exemptions for affordable housing projects from NEPA. This will further the quick deployment of federal funds to support new housing developments.

Governor Green issued the Emergency Proclamation Relating to Affordable Housing, which provides various exemptions and fee waivers to expedite the development of affordable housing. Overall, nearly 10,000 housing units have benefited from various exemptions in the Emergency Proclamation. Notably, the Proclamation provides a streamlined process for affordable housing projects on land owned by state and local governments to receive certain zoning, parking requirements, fees, and density exemptions. Over 5,000 units have received expedited entitlements under this process. The Proclamation also provides certain impact fee waivers to provide financial relief for affordable housing projects amidst the high-interest rate environment, providing an estimated \$24 million in deferred school impact fee waivers in the last year.

By-Right Multifamily Housing Development

As part of efforts to increase housing availability, states have also passed legislation to establish by-right processes, which enable housing projects to proceed without discretionary review and approval if they comply with all applicable laws and regulations. These types of measures move community engagement and participation earlier in the process, during the land use planning stage, to create buy-in from the community, prevent project delays, and spur more housing development.



Another promising best practice at the state level is allowing multifamily housing by right on commercially zoned land. California, Montana, and Hawai‘i have adopted this approach widely, while Arizona has adopted certain components. Colorado has adopted a related policy based on proximity to transit.

Montana's Streamlined Public Comment Period

Montana passed state legislation (S.B. 382) in 2023 to require cities with 5,000 residents or more, within a county of 70,000 people or more, to adopt a land use plan that integrates public participation early in the planning process and streamlines municipal decisions, such as permitting.

Washington's Contract Hearing Examiners

Washington allows cities and counties to hire or contract hearing examiners to approve preliminary plans and amendments to zoning ordinances and manage the community engagement process. This option removes important development and zoning changes from political influence, promotes timely and informed public participation, and provides efficient review and determination of land use decisions, speeding up the process by at least 60 days.

Manufactured and Modular Housing

Manufactured and modular homes could help address housing shortages in the West. These prefabricated structures have the potential to help increase supply and improve affordability, since they are less expensive and faster to build than traditional construction. However, modular housing – housing that is constructed off-site and assembled on-site – is not governed by a federal code like manufactured housing. As a result, modular housing is subject to different building codes, regulations, and inspection processes across state and local jurisdictions, making it difficult for developers to scale.



Salt Lake City, Utah Workshop

The first workshop of the BRAND West initiative, hosted by Governor Spencer Cox at the University of Utah's Hinkley Institute of Politics in Salt Lake City, highlighted several tools to address the country's growing housing crisis.

"I just keep asking the question, are we going to be the first generation in the history of the United States to make life worse for our kids and grandkids?" Governor Cox rhetorically asked the crowd. "Right now, the answer appears to be yes across much of the United States."

To ensure the continued realization of the American Dream, panelists discussed leveraging infrastructure investments to spur new housing projects, unlocking capital for housing developments, coordinating state and local housing priorities, and transforming buildings through adaptive reuse.

"There's nothing more important right now than what you're doing," Governor Cox continued. "This is legacy stuff... This is the work that will change lives. More than anything else we do in government work, this is the stuff that can pay off for a long, long time to come."

Multi-State Reciprocity Agreements

Western states are interested in regional agreements to standardize requirements and promote the wider-scale adoption of modular housing. Currently, Idaho, Washington, and Oregon have a reciprocity agreement that allows manufacturers located in these three states to receive shared

plan review and inspection services. Regional multi-state agreements could provide a model for creating a national modular housing standard like the HUD Code in the future. Reciprocity agreements allow larger-scale production and bring the best practices from each state together to ensure safe and durable manufactured and modular housing.



South Dakota's DakotaPlex Program

In South Dakota, the DakotaPlex Program addresses the need for affordable multifamily housing in rural communities. Designed as two-and three-bedroom units, DakotaPlex homes can be configured as duplexes, triplexes, or quadplexes, providing flexible solutions for various community needs. These units are constructed with energy-efficient materials and techniques, ensuring sustainability and low maintenance. Targeting rural areas with populations of 5,000 or fewer, the program requires communities to demonstrate a documented need for housing, fostering strategic development and growth. This innovative approach enhances the availability of affordable rental options, supporting the vitality of South Dakota's smaller communities.

Reducing the Costs of Homebuilding

Financing Tools

The federal government has played a central role in the housing market since the 1930s, mainly by subsidizing affordable housing development and supporting the mortgage and loan markets. Over time, the federal government shifted away from directly building and managing public housing to offering rental and homeownership assistance and delegating greater responsibility for lower-income housing to states, localities, and the private sector through the creation of various block grants, competitive grants, loans, tax credits, and other incentives. Most of these programs are administered by HUD, with assistance to rural communities provided through the USDA and tax benefits through the U.S. Department of the Treasury. The Federal Housing Finance Agency (FHFA) oversees Fannie Mae and Freddie Mac, the Government-Sponsored Entities (GSEs) that securitize home mortgages. States and territories administer federal programs and funding in addition to creating and implementing



Steve Waldrip, the Senior Advisor for Housing Strategy & Innovation with the Office of Utah Governor Spencer Cox, spoke at the BRAND West initiative workshop in Salt Lake City about financing strategies and funding mechanisms that are designed to accelerate the development of middle-income housing, improve housing affordability, and respond to growing demands.

their own statewide programs and policies, which have increasingly focused on financing housing development and preservation.

State Low-Income Housing Tax Credits

Eleven western states have established a state LIHTC to generate more private investment and fill financing gaps in affordable housing, and these programs have been widely successful. State LIHTCs are either allocated credits, like the federal LIHTC Program, or certificated credits. There are a variety of approaches to structuring and awarding credits, but many states build upon federal LIHTC efforts and requirements to simplify the process and enhance the impact. Some states have also bifurcated their state credit from the federal credit, meaning that two different entities can invest in the same project, which helps increase flexibility and maximize use. Credit periods are generally five to ten years. Developers tend to prefer the shorter-term credit periods because they can generate higher project profitability and quicker returns on investment.

Utah Homes Investment Program

Some states are exploring ways to offset development costs and incentivize the construction of more attainable housing options. For example, during Utah's 2024 legislative session, Governor Cox's administration helped secure \$300 million from the state's Transportation Investment Fund for an innovative new program. The Utah Homes Investment Program (H.B. 572) offers low-interest loans to developers to increase the supply of attainable starter homes across the state – particularly for teachers, first responders, and veterans – and improve access to financing at reasonable rates for small- and medium-sized builders. Many of these builders pay interest rates of 8 to 12 percent, if they can obtain loans at all. Through this program, builders who designate at least 60 percent of units in an owner-occupied housing project as "attainable" are eligible for loans with interest rates as low as 3 or 4 percent.

Nevada's Growing Affordable Housing Program 2.0 and Housing Access and Attainability Act

In response to the increased project costs for affordable housing developments, the Nevada Housing Division piloted a Growing Affordable Housing Program 2.0 to provide subordinate financing by leveraging private financing partners. The current limit for these funds is \$3 million, with payments dependent on cash flow. The pilot program addressed two issues: 1) due to the payment structure, the amount of time to revolve limits the impact of the funds, and 2) financing gaps have increased, and the \$3 million amount is no longer enough. The pilot program loan was comprised of \$3 million of Nevada Housing Division funds at 3 percent simple interest, blended with \$2 million of CDFI funds at 7 percent interest to bring \$5 million into the project. The affordable developer was able to present a financial structure, with senior debt and equity investor approval, in which the cash flow received after the project was Placed in Service would be split between the developer's deferred developer fee and the loan.

Because of the work through the pilot program, the Nevada Housing Division was able to demonstrate a small-scale proof of concept and show how they can leverage private funds and require a faster revolving of funds. This experience helped inform Governor Joe Lombardo's Nevada Housing Access and Attainability Act, in which \$133 million will be deployed as loans or collateral, in partnership with private financial institutions and private developers. These loans or collateral investments are forecasted to revolve in two to four years for both affordable and attainable housing. Eligible uses will include purchasing land and the construction of new multifamily rentals and multifamily and single-family homes.

Arizona's Financing Package

Arizona incentivizes affordable housing and broadens access by offering state tax credits, subsidies, and low-interest loans to developers building affordable housing. To maximize impact with limited federal tax credits, the state restricts tax credits per project to \$2.5 million, and developers to \$3.5 million for urban areas and \$3.75 million for rural areas. The state limits projects to competing in a single set-aside category, and new construction awards to one per county with the potential for a second award. Arizona also prioritizes at least 10 percent of awards for nonprofits or Choice Neighborhood recipients, encourages affordable and rapidly deployable alternative housing options, and offers incentives to developers who build in rural, underdeveloped, and tribal areas, including designated set-asides. Additional incentives are allotted to owners who participate in housing assistance programs and commit to leasing at least 15 percent of units to Tenant-Based Rental Assistance recipients and certain at-risk populations.

Colorado's State Affordable Housing Fund

The Colorado State Affordable Housing Fund of approximately \$300 million was established by a voter-approved ballot measure, Proposition 123. The fund provides grants and loans to nonprofit agencies, community land trusts, nonprofit and for-profit developers, and local governments that make commitments to increase affordable housing stock.

New Mexico's Housing Investments

New Mexico has allocated record funding in recent years with over \$400 million in housing investments in the 2024 and 2025 legislative sessions. The funding is directed toward housing needs and homelessness interventions and creates a new

\$125 million opportunity enterprise housing development fund designed to serve families left out of traditional affordable housing program qualifications.

Addressing Cost Drivers

By examining the underlying pressures that increase the cost of housing, all levels of government can contribute to cost reduction. At the state and local level, cost drivers include infrastructure and site preparation. Land, labor, and material expenses have soared, fueled by labor and supply shortages created by the COVID-19 pandemic and subsequent inflation. Specific regulatory requirements also contribute to costs to a degree that can sometimes outweigh the benefits. Regulatory compliance costs account for an estimated 24 percent of the purchase price for single-family homes and 40 percent of the purchase price for multifamily homes.

New Mexico's Site Readiness Act and Investments

In New Mexico, Governor Lujan Grisham and the legislature specifically included infrastructure development in the \$110 million appropriation to housing initiatives in the 2025 legislative session. The innovative Economic Development Site Readiness Act (S.B. 169) also expressly included housing availability in the site characterization studies that will occur across the state as a precursor to certifying properties as "strategic economic development sites." The Site Readiness Act was coupled with \$24 million over three years to fund these studies and certifications.

Community Land Trusts

Community land trusts use deed restrictions or renewable land leases to ensure that homes remain permanently affordable, meaning that the down payment assistance and funding invested in the first purchase



are not lost, even when homes are sold. For example, a home priced at 65 percent AMI can, after 10 years, be adjusted to 47 percent AMI. They have become increasingly popular at the state and local levels and within the affordable housing continuum. Many assume a nonprofit with all conventional tools must operate a land trust, but other models exist. For-profit developers, cities, and counties are using deed restrictions creatively to maintain affordability. These programs incentivize developers to restrict home affordability for a period to reduce costs. Standardization and guidance are important for land trusts, especially so that smaller, rural land trusts can structure and sustain their programs. Establishing baseline standards at the state level helps create uniformity and reliability, ensuring that clients understand wealth-building opportunities.

Supporting Families Through Initiatives That Help Renters and Homebuyers

Experts widely agree that limited availability is a key driver of rising housing costs. Housing is less affordable than ever, while incomes have remained largely stagnant. With the median home now costing six times the median household income, the American Dream of homeownership has slipped away from much of the population. Rents are 27 percent higher than they were in 2000.

Nearly half of all renters – 22.6 million U.S. households – are considered cost-burdened, meaning that they spend more than 30 percent of their income on rent and utilities. Prohibitive rental costs can price people out of rental options, leading to housing instability and homelessness, which is currently at a record high in the U.S. Building new housing is critical to bringing down costs, but it is not always enough. All levels of government play a role in offering homeownership



Bend, Oregon Workshop

Governor Tina Kotek hosted the second BRAND West initiative workshop in Bend, Oregon, which has become one of the fastest-growing cities in the country thanks to its proximity to several National Forests and wilderness areas that have made it a hub for outdoor recreation.

“We don’t have enough housing,” Governor Kotek said. “That affects our economy, it affects our health, it affects who we are as a state, but I know that we can get more housing built...Oregon is on a great path. I think in the next year or two we’re going to see all the work we’ve done over the last nine years really bloom.”

In particular, she highlighted the efforts of local government leaders and community partners in Bend as a model for proactive housing strategies that effectively balance growth with sustainability. She also touted the success of legislative measures like middle housing initiatives and urban growth expansions while calling for streamlined federal funding processes and increased investment in affordable housing infrastructure.

and rental assistance for lower-income households to spur demand that can support affordable housing development.

Assistance for Renters

Attainable and diverse rental housing options are essential to supporting low-income households, providing a pathway to homeownership, and

addressing a host of housing needs. Assistance for renters is also a critical piece of homelessness prevention.

Washington’s Eviction Prevention Rental Assistance Program

Many western states and localities have created programs akin to the successful pandemic-era federal rental assistance and eviction prevention

programs. For example, in Washington, the Eviction Prevention Rental Assistance Program provides funding to help families with rent, including rental arrears and future rent if needed to stabilize the applicant's housing and prevent their eviction, as well as utility assistance for households to prevent an eviction.

Portland, Oregon's Eviction Legal Defense Program

In partnership with the Oregon Law Center, Portland Community College's Legal Resource Center, Metropolitan Public Defenders, and United Way of the Columbia-Willamette, the Portland Housing Bureau offers an Eviction Legal Defense Program to provide free legal support to tenants facing eviction. The program is available to Multnomah County residents who are facing eviction and who earn 60 percent or less of the AMI.

Boulder, Colorado's Eviction Prevention and Rental Assistance Services

Similarly, the City of Boulder, Colorado, offers an Eviction Prevention and Rental Assistance Services Program that expands legal and financial services for those facing a potential eviction. The program helps people resolve eviction-related housing issues through legal services, rental assistance, and mediation. Tenants can seek these free legal services as soon as they receive a Notice of Termination and do not need to wait until an eviction case is filed.

Providing Pathways to Homeownership

Homeownership is a cornerstone of financial stability and generational wealth in the U.S. Ensuring access to homeownership opportunities reduces reliance on federal assistance and encourages upward mobility.



In Governor Hobbs's 2025 State of the State address, she spoke about the success of Arizona is Home and announced that she will be doubling the number of down payment assistance recipients this year. In this picture, Governor Hobbs is speaking at WGA's 2024 Western Prosperity Forum.

Arizona is Home

Arizona is Home is an initiative for low- and moderate-income first-time homebuyers. Funding is available for down payment assistance, interest rate buydown, and closing costs as a silent second mortgage due on sale, with up to \$30,000 for those making less than 80 percent AMI and up to \$20,000 for 81 to 120 percent AMI. Its Mortgage Assistance Program offers below-market 30-year fixed interest rates with four percent down payment and closing cost assistance to homebuyers with incomes less than 80 percent AMI in rural counties.

Investing in Strategic, Innovative, and Data-Informed Initiatives Across the Housing Ecosystem

Access to housing goes beyond building homes – it involves building environments where people can thrive. Strategic, thoughtful growth helps foster vibrant and resilient communities that serve the needs of both current and future residents.





Capacity Building and Workforce Development

Robust local capacity is essential for increasing housing development and maximizing the impact of state and federal resources, especially in rural communities where limited staffing, expertise, and infrastructure can hinder progress. Housing development is also constrained by a significant shortage of construction workers, slowing the pace of new projects and increasing costs each year. Across the construction industry, there are 200,000 to 400,000 unfilled jobs in any given month. The problem is expected to grow as more workers retire than enter the industry. Addressing the skilled labor shortage would remove one of the barriers to building more homes.

New Mexico's Executive Order on Climate Ready and Infrastructure Workforce

In 2024, Governor Lujan Grisham issued Executive Order 2024-152 to address the urgent need for a

skilled infrastructure and climate-ready workforce in New Mexico. The Executive Order recognizes the pivotal role that workforce development plays in achieving the state's ambitious goals for infrastructure improvements, including housing. Under the Executive Order, the New Mexico Department of Workforce Solutions is coordinating with 10 other state agencies on climate-ready and infrastructure workforce training activities to encourage integration across programmatic and sector needs and alignment with the state's existing workforce development and education systems. Coordinated climate-ready and infrastructure workforce strategies will ensure employment pathways lead to good-paying, high-quality jobs that protect worker safety, promote worker voice, and support workers and their families throughout their careers. The Executive Order identifies the goal for Partnership Agencies to collectively facilitate

and support the training of 2,000 workers in infrastructure and climate-ready professions by December 31, 2026.

Oregon's General Housing Account Program – Capacity Building

The Oregon Department of Housing and Community Services offers the General Housing Account Program – Capacity Building, which provides grants, training, and technical assistance opportunities to help build capacity in individuals, organizations, geographic regions, and systems toward the development and sustainable operation of affordable multifamily rental housing. In addition, the Oregon Centralized Application Capacity Building Grant helps organizations that currently – or have taken documented steps to – develop, preserve, or operate affordable rental housing by providing funds for a variety of capacity-building activities.

Sustainable and Resilient Development

Community resilience is key to ameliorating the effects of many disasters and emergencies. Damage could be avoided or minimized if resources are directed at pre-disaster mitigation efforts. Hazard mitigation and risk reduction are the most cost-effective ways to protect lives, property, infrastructure, and the environment from the effects of natural and human-caused hazards.

International Wildland-Urban Interface Code

Land use planning can be one of the most useful tools for local governments in reducing and managing risks to their communities. Designating high-risk areas like the wildland-urban interface and following associated codes in these areas help guide housing development decisions. California, Montana, Nevada, Utah, and Washington have adopted the International Wildland-Urban Interface Code, or aspects of the Code, at the state level.

Northern Mariana Islands' Resilience Programs

To reduce barriers and promote resilience, the Northern Marianas Housing Corporation emphasizes operational efficiency and sustainable practices. The agency has modernized its housing stock by completing 132 resilient homes post-Super Typhoon Yutu – incorporating Green Building Standards and typhoon shutters – with a goal of 300 homes by 2026.

Colorado's Wildfire Resiliency Code Board

Colorado is investing in proactive risk reduction measures, including establishing the Wildfire Resiliency Code Board to help enhance community safety and resiliency from wildfires through the development and local adoption of model codes and standards tailored to Colorado (S.B. 23-166).

Cooperation and Coordination

At all levels of government, housing programs and initiatives are often scattered among multiple agencies. Models for removing these silos range from consolidation of housing efforts into a single office to councils and working groups that coordinate efforts that remain under separate agencies.

Utah's Commission on Housing Affordability

The Utah Commission on Housing Affordability, which was formed several years ago to bring different individuals, organizations, and sectors – realtors, builders, public-private partnership advocates, members of the private property rights coalition, cities, counties, and transportation officials – to the table, meets for part of the year to discuss housing issues and potential policy recommendations for the legislature. More than 65 bills have been passed since its creation due to the months of careful coordination and consensus-building before each legislative session.

Arizona Governor's Interagency and Community Council on Homelessness and Housing

Recognizing that the widespread affordable housing crisis requires a unified approach, Governor Hobbs reinstated the Governor's Interagency and Community Council on Homelessness and Housing in January 2023. The Council, which is based on the blueprint of the United States Interagency Council on Homelessness, brings together public, private, nonprofit, faith-based, and lived-experience perspectives to collaboratively develop and implement solutions to homelessness and housing insecurity. It serves as the state's central resource for policy and planning, leveraging best practices and existing plans to drive meaningful change and connect all Arizonans with safe, stable housing.

New Mexico's Office of Housing

New Mexico is mounting a comprehensive response to the housing affordability and homelessness issues currently affecting the state. In 2024, Governor Lujan Grisham established an Office of Housing through executive authority. It is working on systems-level issues focused on decreasing the cost of new housing and ending the shortage of over 40,000 housing units that the state is currently facing. The Office is specifically focused on removing regulatory barriers to new housing development, growing the construction and trades workforce, leading a coordinated statewide strategy to reduce homelessness, providing cross-agency coordination and technical assistance to the state's housing and homelessness activities, and creating a housing data framework to assess needs and progress towards the state's housing goals.

Northern Mariana Islands' Consolidated Plan

The Commonwealth of the Northern Marianas Islands is enhancing access to housing through strategic planning and community-focused initiatives. The Northern Marianas Housing Corporation's comprehensive approach includes drafting a five-year Consolidated Plan that integrates public comments to reflect resident needs, ensuring alignment with long-term goals like redevelopment and modernization of the housing stock. By fostering public-private partnerships and leveraging funding such as LIHTC and the HOME Program, the Corporation supports a variety of housing solutions, including rental assistance and homeownership opportunities. Notably, it administers 93 Emergency Housing Vouchers, 357 HCVs, and 118 multifamily units while annually aiding four to six families with homeownership through a \$500,000 HOME Program allocation.

Additionally, the Northern Marianas Housing Corporation addresses homelessness through the Emergency



Solutions Grant and Housing Trust Fund, assisting four to six families annually with an \$80,000 allocation. By streamlining processes, implementing accounting software for cost efficiency, and prioritizing regular inspections as well as resident feedback, the Corporation ensures quality, accessibility, and disaster-ready housing.

Wyoming's Statewide Needs Assessment and Housing Plan

Due to the efforts of the Wyoming Community Development Authority, Wyoming possesses a comprehensive understanding of the state's housing challenges and effective strategies to tackle them. In 2024, the Wyoming Community Development Authority published its Statewide Housing Needs Assessment, which provided analyses of both statewide and regional housing challenges. Among its key findings was a projection that, to meet the demands of household growth and shifting demographics, Wyoming will need to add between 20,700 and 38,600 housing units by 2030. Building on this insight, the Authority then published the Wyoming Statewide Strategic Housing Action Plan in January 2025. The plan outlined the intricate network of stakeholders shaping Wyoming's housing landscape and proposed strategies for state and local policymakers, regulators, and community members to address housing challenges. The plan notably emphasized the importance of local autonomy – a deeply valued principle in Wyoming – by equipping communities with research-backed strategies to address their unique housing challenges. This information is easily accessible through the state's Local Housing Policy Lookup Tool.

South Jordan, Utah's Master Development Agreement

Even at the level of specific developments, enhanced coordination can be instrumental to success. City leaders had a vision for Daybreak



During WGA's BRAND West workshop in Salt Lake City, Utah, attendees toured Daybreak, a 4,100-acre master-planned community in South Jordan, Utah, with the city's mayor, Dawn Ramsey.

in South Jordan, Utah, from the beginning. They created a master development agreement for the community, designed with enough flexibility to respond and adapt to market conditions over time. This plan, along with by-right entitlement granted by the City of South Jordan, provided a principle-based approach and a strategy for intentional growth. Over the past 21 years, local partners have demonstrated how large-scale and long-term planning and development can effectively integrate housing, amenities, and infrastructure while enhancing quality of life. Daybreak is now known for its homes on smaller lots, improved street frontage, diverse housing types serving everyone from first-time homebuyers to retirees, varying levels of density, proximity to commercial and residential needs, transit-oriented development, shared green spaces, and pedestrian and bicycle infrastructure.

Responsible Development on Publicly Owned Parcels

All levels of government hold public lands. Sometimes the reason for public ownership is clear and necessary, such as environmental, recreational, or cultural protection. At other times, public lands became public because of swaps, annexations, or other processes that did not align with a clear purpose or no longer fit the intended purpose or value. By identifying and opening appropriate publicly owned parcels to responsible housing development, all levels of government can make a key contribution to the housing crisis.

Hawai'i's Public-Private Partnerships

Streamlining state requirements has allowed Hawai'i to push forward its initiative to build housing on state-owned lands suitable for housing development. Hawai'i has over 24,000 new housing units across 73 projects planned on state-owned lands,

the majority of which are in transit-oriented development areas. Half of these new housing units are part of Governor Green's Ka Lei Momi Public Housing Redevelopment Initiative, which utilizes HUD's Restore-Rebuild Program, formerly known as the Faircloth-to-RAD Conversion Program. Through this process, public housing agencies can combine public housing mixed finance development and a Rental Assistance Demonstration (RAD) conversion in an integrated transaction, allowing them to develop public housing units by rebuilding homes that were demolished or sold over the past 20 years and restoring rental assistance subsidies that were lost from the affordable housing portfolio. The public-private partnership aims to transform lower-density public housing sites that are in dire need of capital improvements into vibrant, denser, mixed-income communities.

Colorado's Public-Private Partnership Unit

Colorado is building up a state Public-Private Partnership Unit to identify and leverage underutilized and vacant State Land Board properties into valuable community assets for affordable and workforce housing development (S.B. 22-130).

Nevada's Public Land Management Program

Housing challenges are often compounded in western communities because they are surrounded by federally managed land. This issue is even more acute in a state like Nevada, where more than 80 percent of the land is federally managed. While access to land is only a piece of the housing puzzle, in Clark County, the land available for development is slated to run out by 2032. In these instances, it is necessary to build more efficiently while considering ways to expand land access for development. Nevada has an extensive history of balancing these considerations through the Southern Nevada Public Land Management Act of 1998 (SNPLMA, Pub. L. 105-263), which allows for the disposal of the Bureau of Land Management (BLM) land within a specific boundary around



Rethinking Rental Policy Webinar

To explore strategies for rental reform, WGA hosted a webinar with Benjamin Preis, the Director of the National Housing Crisis Task Force and a Senior Research Fellow at the Nowak Metro Finance Lab within Drexel University's Lindy Institute for Urban Innovation; Cheryl Cohen, the Housing Division Administrator at the Montana Department of Commerce and the Executive Director of the Montana Board of Housing; Megan Yonke, the Senior Housing Policy Advisor for the Office of Colorado Governor Jared Polis; and Robert Henson, a Senior Housing Policy Specialist at the National Council of State Housing Agencies.

The webinar's presenters spoke about the need to improve rental assistance and affordable housing programs to ensure that federal dollars have the greatest impact and serve those most in need. They also discussed the need to limit regulatory burdens within NEPA and Davis-Bacon to reduce costs and streamline development timelines.

"We're seeing partners who don't want to accept [federal] HOME funds at all because [the Davis-Bacon Act] automatically comes with a 20 percent increase for residential projects," Megan Yonke said. "Also, NEPA has really gotten out of control with its regulation of vapors, as well as regulating water from downstream sources. So, just a lot of room for some commonsense reforms to both of those pieces of legislation to allow HOME dollars to go further."

Las Vegas for community expansion and economic development. The revenue is split between the U.S. Department of the Interior (DOI), the State of Nevada, Lake Tahoe, and eligible counties to fund recreation and conservation projects, with 85 percent available to the Secretary and 15 percent

allocated to Nevada for specified state and local purposes. SNPLMA provides examples of how federal land being transferred to state, local, tribal, or private ownership can be compatible with protecting valuable public assets, supporting conservation efforts, and meeting critical community needs.





RECOMMENDATIONS FOR FEDERAL ACTION

Simplifying and Streamlining Housing Development

Recommendation: Congress should continue supporting communities in removing barriers to housing development by increasing funding for the PRO Housing Program.

The PRO Housing Program, administered by HUD, is a competitive grant for communities to identify and remove barriers to affordable housing production and preservation. The 2023 Consolidated Appropriations Act (Pub. L. 117-328) provided \$85 million to establish this program, and Congress appropriated \$100 million in subsequent years. Demand for the program, nevertheless, continues to far exceed available resources, with the most recent round of funding significantly oversubscribed.

Recommendation: Congress should revisit NEPA requirements for all infill housing development on parcels outside sensitive or protected areas.

The development of vacant and underutilized land within established urban areas has multiple benefits, including curbing urban sprawl, increasing density, and leveraging existing infrastructure. Although these sites are already in developed neighborhoods and tend to be minimally disruptive to the environment, they are still subject to the same extensive environmental review processes.

While the preparation and completion of the required environmental assessment or environmental impact statement adds costs and time to projects, it

can also provide needed protection for environmentally or culturally significant areas. A clear, consistent, focused, and effective review of the NEPA processes applicable to infill housing development is essential to protect environmental resources, ensure public participation, and facilitate timely decision-making in the design, financing, and execution of housing projects.

Recommendation: Congress should remove the HUD Code requirement for manufactured homes to sit on a permanent chassis.

Congress passed the Manufactured Housing Construction and Safety Standards Act of 1974, commonly referred to as the HUD Code, to direct HUD to establish national manufactured housing standards

and regulations. The law defined manufactured homes as being “built on a permanent chassis,” which is a steel frame used to provide structural support and transport the home. In the past, manufactured homes were typically installed on temporary foundations. The requirement to keep the permanent chassis, even after the home was transported from the factory to a property, was meant to ensure future portability. However, manufactured homes are seldom moved today once they have been attached to the land. Requiring a permanent chassis is an outdated standard that has hindered the use of manufactured homes by restricting design flexibility, reinforcing stigma, and disqualifying them from conventional mortgages, ultimately increasing financing costs.

Reducing the Costs of Homebuilding

Recommendation: Congress should enact programmatic changes to maximize the use of the LIHTC Program. To enhance the effectiveness of LIHTC in rural communities, Congress should allow multiple development sites to qualify as a single project and streamline requirements associated with multi-site development.

To date, the federal LIHTC Program is the largest and most productive program for increasing the supply of affordable rental housing, having facilitated the development of four million homes, myriad jobs, and billions in taxes and local income. LIHTC, created by the Tax Reform Act of 1986 (Pub. L. 99-514), gives state and local housing finance agencies \$10 billion in annual budget authority to issue 4 and 9 percent tax credits for the acquisition, rehabilitation, or new construction of rental housing for lower-income households. The 4 percent LIHTC provides a 30 percent construction subsidy. It is also used to acquire existing buildings for rehabilitation and finance new construction through tax-exempt Private Activity Bonds

(PABs). The 9 percent LIHTC provides a 70 percent subsidy and is mostly used for new construction and substantial rehabilitation projects. Despite the success of the program, several modifications could unlock its full potential and ease persistent housing shortages.

There are frequently more applications for 9 percent credits than available allocations. In 2018, Congress raised the LIHTC cap by 12.5 percent in the Consolidated Appropriations Act of 2018 (Pub. L. 115-141), increasing the number of 9 percent credits available to each state until 2021. This expansion helped states respond to urgent housing needs.

State authority to issue PABs is also limited. Many western states routinely reach their PAB cap under the current bond financing model. This constrains their ability to access the 4 percent LIHTC and, consequently, their ability to implement housing solutions and maximize state and local funds. Changing the threshold would allow for more affordable housing projects.

In current policy, Western Governors support Congress expanding the 9 percent LIHTC by reauthorizing the 12.5 percent cap increase in state credit allocations, with a further 50 percent increase moving forward. They also support lowering the PAB financing threshold from 50 to 25 percent.

Changes to the LIHTC Program have garnered broad bipartisan support from Congress since legislation was first introduced in 2016. Legislation would reauthorize the 12.5 percent cap increase and expand allocations by 50 percent over two years, as well as lower the PAB cap from 50 to 25 percent. It would reform parts of the program to reduce barriers for rural and tribal communities and better serve extremely low-income households by providing higher subsidies for properties that house these populations. With the expiration of the 2017 Tax Cuts and Jobs Act (Pub. L. 115-97) this year, Congress could

consider several new and existing tax credits and incentives for housing, including LIHTC.

Recommendation: Congress should appropriate sufficient resources to finance housing options in rural areas, and the federal government should promote flexibility within these programs wherever possible.

Rural communities face unique challenges that make it harder to finance new development and rehabilitation projects for sorely needed housing. Between 2010 and 2020, available rural housing units only increased by 1.7 percent. USDA Rural Development’s Section 515 Rural Multifamily Rental Housing Direct Loan Program was once the principal source of financing for affordable rental homes in rural America, but funding has been cut by more than 95 percent over the past few decades, and no new projects have been completed since 2011. Additionally, traditional tools for affordable multifamily development, like LIHTC, are not always competitive or financially feasible in rural areas.

Western Governors’ policy recognizes that the federal government should enable the LIHTC Program to work more effectively for rural, tribal, high-poverty, and high-cost communities in existing policy. Even with states reserving a specific percentage or dollar amount of LIHTC allocations for projects more likely to serve specific populations or locations in their Qualified Allocation Plans, the high overhead costs for the program, coupled with small project sizes and a lack of other financial sources, deter rural development and highlight the need for a more flexible approach.

Recommendation: Congress should create a tax credit for the development and preservation of attainable single-family housing in low-income areas.

For a number of years, Congress has introduced bipartisan legislation that would create a tax credit for developing





and preserving single-family housing in low-income communities. Modeled after LIHTC, the credit seeks to harness the private market to boost the supply of affordable single-family homes, addressing a segment of the market that other federal tax credits do not. Congress could consider authorizing this credit in the tax bill.

Recommendation: Congress should ensure adequate appropriations for housing block grants to state and local governments, recognizing the important role they play in the affordable housing landscape.

HUD's HOME Program is the largest federal block grant available to state and local governments for supporting affordable housing efforts focused on low-income households below 80 percent of the AMI. The program funds a wide range of activities, including building, buying, and rehabilitating affordable housing for rent or homeownership, as well as providing direct rental and homebuyer assistance. It has supported 1.35 million affordable housing units and 415 million families with Tenant-Based Rental Assistance. It also often provides critical gap financing that makes rental housing funded by LIHTC or

other federal, state, or local housing projects possible. While the 2025 Full-Year Continuing Appropriations and Extensions Act (Pub. L. 119-4) maintained funding from the previous fiscal year, the program has been at risk in recent years.

Recommendation: Congress should create a dedicated preservation financing tool, such as a tax incentive, to preserve and rehabilitate the existing housing stock.

Due to a lack of end-of-life and capital repairs, the market is projected to lose between 200,000 and 300,000 units of housing over the next few years. The ability to preserve and rehabilitate the existing housing stock usually boils down to funding. While other federal programs can be used for these purposes, resources are increasingly – and justifiably – allocated to new construction in response to escalating supply shortages. However, ignoring preservation will only exacerbate shortages, demonstrating the importance of specific funding sources for improving the existing housing stock.

Recommendation: NPS should update the guidance for historic preservation tax incentives to allow for multifamily housing.

The Federal Historic Preservation Tax Incentives Program, which encourages private sector investment in the rehabilitation and reuse of historic buildings through a 20 percent income tax credit, is one of the nation's most cost-effective community revitalization programs. In addition to creating jobs, it has leveraged \$132 billion in private investment to preserve more than 49,000 historic properties since 1976. The program is administered by NPS and the Internal Revenue Service in collaboration with State Historic Preservation Offices. Preservation can help develop housing and revitalize downtowns and main streets. However, federal historic preservation standards, developed by NPS, as well as the interpretation and enforcement of these standards, have limited the usability of the credit for housing. Increased flexibility to reconfigure floor plans and assembly spaces, create atria and additions, and rehabilitate the upper floors of multi-story buildings would facilitate the conversion of underutilized space into housing, apartments, or co-living areas.

Recommendation: If Congress reauthorizes Opportunity Zones, changes should be made to more effectively integrate the incentive with existing efforts to increase housing availability and maximize its benefits by improving program flexibility and requiring specific outcome-based metrics for housing.

The Opportunity Zones incentive, established in the Tax Cuts and Jobs Act of 2017 (Pub. L. 115-97), was designed to attract private investment to low-income areas. It provides investors with capital gains tax benefits in exchange for qualifying long-term investments in designated census tracts. Congress may consider an extension of the Opportunity Zones incentive in the tax bill or its permanent inclusion in the tax code.

Limited data and transparency have made it challenging for states to fully understand the effects of the Opportunity Zones incentive on housing and its role within the broader housing financing landscape. The public data that does exist indicates that investment has been concentrated in a small number of urban centers. Investors and developers have also encountered challenges around using this incentive in the capital stack with other federal resources, especially LIHTC.

Recommendation: HUD and other federal agencies should provide predevelopment resources for housing. Congress should ensure that predevelopment support is included in program design and appropriations.

Necessary predevelopment activities, such as site analyses, feasibility studies, community engagement, and permitting and approval processes that prepare builders for a successful construction phase, are difficult to undertake, especially in rural and underserved communities. Predevelopment assistance can have a significant impact on lowering the upfront monetary and non-monetary costs of housing development by covering some of the expenses incurred



while determining the feasibility of projects, which can take months or even years to complete.

Greater support for these activities would help facilitate community housing development.

Recommendation: HUD and USDA should carefully consider how new standards, codes, and requirements will affect the cost of housing financed by the agencies and provide flexibility in implementation where appropriate.

In 2024, HUD and USDA finalized a rule to adopt the 2021 International Energy Conservation Code as the minimum energy standard for the new construction of housing financed by the agencies. The Administration has since announced a six-month delay in enforcing this ruling. With energy codes traditionally adopted by states and localities, requirements vary widely across the West. Imposing a federal standard could risk driving up costs and stymying housing development at a time when the nation needs to accelerate production.

Recommendation: Congress should allow exemptions to Davis-Bacon if prevailing wage rates are less than the minimum wage in a jurisdiction.

Davis-Bacon requires federal government construction contractors

on covered public buildings and public works projects to pay the "prevailing wage" to laborers. Applying Davis-Bacon to multifamily projects significantly increases the administrative burden of projects, which may be a worthwhile tradeoff when it ensures that workers are getting paid a living wage. However, in instances where the federal prevailing wages are less than the minimum wage in a jurisdiction, the application of Davis-Bacon is a regulatory cost without a reward.

Supporting Families Through Initiatives that Help Renters and Homebuyers

Recommendation: HUD should simplify administrative and operational requirements for rental assistance to improve landlord engagement and HCV utilization.

More than five million low-income Americans rely on HCVs to afford housing in the private market. The demand for HCVs is far greater than the supply, with only one in four eligible households receiving a voucher. Even when households obtain vouchers, they encounter difficulties securing housing, leaving nearly 40 percent of vouchers unused. Landlords are increasingly leaving the program due to administrative and structural



burdens, including onerous paperwork and lengthy inspection and approval processes. Actions like pre-approving units, allowing pre-inspections, and accepting local building code inspections instead of separate HUD inspections could encourage landlord engagement and help people find housing.

Recommendation: HUD should reassess and update the data sources for FMR determinations to ensure that the HCV Program provides accurate voucher amounts to western residents.

FMRs frequently fail to capture the true cost of housing in the West. The methodology HUD uses to set these rents each year relies on insufficient data, especially in rural and frontier areas that do not have enough rental stock for an accurate sample and in rapidly appreciating counties, resulting in a substantial gap between actual rents and FMRs. FMRs determine the rent amount that the voucher will cover, so inaccurate calculations significantly affect a tenant's ability to secure safe, decent, and affordable housing. HUD calculates base rents from the U.S. Census Bureau's 5-Year

American Community Survey (ACS) and makes several adjustments using rents from the 1-Year ACS. The process takes more than a year, meaning that FMRs are primarily based on three-year-old data projected to an inferred inflation rate. While states can apply for waivers, HUD must address the underlying disparity in the methodology.

Recommendation: HUD should remove barriers and provide resources and incentives to public housing agencies to deploy the Family Self-Sufficiency Program.

HUD offers resources to assist recipients of HCVs and other federal rental assistance in achieving economic independence, including the Family Self-Sufficiency Program. The program aims to increase earnings and savings among families receiving HUD-funded rental assistance. It provides case management and financial coaching services, as well as a financial incentive for higher earnings. Over the course of the voluntary five-year program, participants set financial and employment goals, gain access to supportive services such

as child care, and receive increased escrow account contributions as their earnings and rent payments rise, helping them build long-term assets and financial stability. A recent evaluation demonstrated a high return on investment, with a benefit of \$2.25 for every dollar spent on the program.

Despite these advantages, the program is considerably underutilized, with a participation rate of just 3 percent. Enrollment requirements create obstacles for both housing providers and residents, and housing providers experience issues recruiting for the program. Outcomes also vary greatly based on how public housing agencies implement it. Addressing some of these barriers and promoting higher program participation would empower households to reduce reliance on federal assistance.

Recommendation: Congress should decouple USDA mortgages from rental assistance and permanently authorize a stand-alone rental assistance program.

USDA Rural Development's Section



521 Rental Assistance Program, which covers the difference between 30 percent of a tenant's income and the monthly rental rate, is only eligible for properties with active mortgages under Section 515 and the Section 514/516 Farm Labor Housing Program. Of the more than 400,000 rental homes developed through Sections 515 and 514/516, 80 percent receive Section 521 rental assistance. Although funding for these programs can be used for new construction and the rehabilitation of existing properties, no new rental properties have been built since 2011. As a result, the mortgages for many of these aging properties will be paid off soon, meaning that residents in about 330,000 units will lose their rental assistance. Loan maturations will begin to peak in 2028, and by 2050 nearly all properties with active mortgages will have completed their loan terms. Without intervention, much of the nation's affordable rural housing will be lost.

The 2024 Consolidated Appropriations Act (Pub. L. 118-42) created a pilot program, the Section 521 Stand-Alone Rental Assistance Program, to "decouple" Section 521 rental assistance from USDA mortgages. Decoupling the programs maintains rental assistance for units that have reached loan maturity in exchange for borrowers continuing to preserve and operate their multifamily properties as affordable rural housing. Bipartisan legislation introduced in Congress seeks to permanently authorize the decoupling of Section 521 rental assistance from Section 515 mortgages. This legislation could be considered in the Farm Bill – the latest extension expires on September 30, 2025 – or another legislative package.

Recommendation: Congress should eliminate the LIHTC qualified contract loophole so that affordable housing stays affordable for the full intended period.

LIHTC subsidies are awarded to developers who commit to offering reduced rents to low-income residents



for a period of 30 years. However, a provision in Section 42 of the Internal Revenue Code presents a loophole for property owners to exit affordability requirements after 15 years. If an owner requests a qualified contract before the 15-year tax compliance period and no one buys the property, it is converted into market-rate housing. In most cases, finding a buyer is difficult because the federally mandated sales price often exceeds the property's value. This process has resulted in the loss of 100,000 affordable housing units. The provision was originally designed as a safety net to provide modest benefits for investors when LIHTC's success was still largely unsubstantiated. Now, it poses a mounting threat to the affordable housing stock and the overall efficacy of the LIHTC Program.

Some states have closed the loophole in their LIHTC Qualified Allocation Plans, but action at the federal level is imperative to preserve the integrity of federal resources. Repealing the qualified contract option could save the federal government \$457 million over 10 years.

Recommendation: Federal agencies should improve educational opportunities for first-time homebuyers and create a "one-stop shop" that consolidates information about down payment assistance programs and other resources.

Education is the first step for many prospective homeowners, as understanding the process of purchasing and maintaining a home is critical to their success. Homebuyer education and counseling programs can help households build wealth and prevent foreclosure. Receiving education and counseling early in the process better prepares homebuyers, while longer programs are associated with greater financial benefits for participants. When homebuyers participate in these programs, delinquency and foreclosure rates are 1 to 2 percent lower, financial literacy increases by 14 percent, and household satisfaction rates increase by 10 to 20 percent.

Recommendation: HUD should incentivize public housing authorities to strengthen and better integrate homeowner assistance into their program offerings.

The Homeownership Program allows families in the HCV Program to use their voucher to buy a home and



receive monthly assistance to meet homeownership expenses. The data is promising – foreclosures and non-payment are rare, and many households exit the program before reaching the end of their 15-year eligibility period due to improved financial stability. However, only about 22 percent of public housing agencies participate in the program. More fully integrating this intervention into the suite of tools administered by public housing agencies would expand homeownership opportunities for lower-income households and support their transition beyond government assistance.

Recommendation: The federal government should update underwriting criteria and requirements to increase the effectiveness of different factors in enhancing the ability to attain mortgages while still insuring against risk.

As the mortgage industry evolves, alternative underwriting factors such as rent reporting will become increasingly useful. Data and evidence are needed to support the wider adoption of approaches beyond those currently represented in credit scores to more accurately demonstrate a borrower's ability and willingness to repay debt. Beginning in March 2023, the Federal Housing Administration (FHA) required lenders to report a positive rental payment history in the algorithm it uses to evaluate borrowers' mortgage applications, known as the Technology Open to Approved Lenders (TOTAL) Mortgage Scorecard. Expanding these types of efforts would help build new and innovative credit evaluation systems and promote access to homeownership.

Recommendation: Congress should modify the methodology for the HOME Program's homeownership value limits to align with other federal programs.

Among its many eligible uses, the HOME Program fosters attainable homeownership by assisting low-income homebuyers with acquiring, rehabilitating, or constructing affordable homes. States and

localities can tailor this support through grants, deferred-payment loans, below-market-rate loans, loan guarantees, or other forms of financial assistance to best meet the needs of their populations. To determine the amount of homebuyer assistance, HUD calculates a homeownership value limit for the initial purchase price or after-rehabilitation value, which must not exceed 95 percent of the area median price for single-family housing. The HOME Program's methodology for calculating these limits underestimates home prices in certain western markets, notably constraining the ability of prospective homeowners to find housing in many communities. Median prices are calculated with at least a year's lag, which can create a significant gap in rapidly appreciating areas. Additionally, assistance administered through the program is not adjusted for the size of the house, making access to larger homes particularly challenging.

The Capital Magnet Fund, managed by the Community Development Financial Institutions Fund (CDFI Fund), previously relied on the HOME purchase price limits. Last year, the CDFI Fund updated its limits to mirror those in the FHA's 203(b) Basic Home Mortgage Guarantee Program, deeming this index more reliable and reflective of current market conditions. Under 203(b), all counties besides high- or low-cost counties have an FHA loan limit equal to 115 percent of the median home price. Despite HUD amending part of its methodology to develop this year's homeownership value limits, the primary determination that the calculation is based on – 95 percent of the median purchase price – can only be changed by statute.

Recommendation: The federal government should examine innovative homeownership and mortgage structures.

Given the high cost of housing, traditional mortgages will remain out of reach for many Americans, limiting their ability to build equity in a home.

As investors continue to seek single-family houses as assets to add to their portfolios, a potential approach is shared ownership, where homeowners purchase a majority share, and investors hold a minority stake. This could lower upfront costs and increase affordability to make homeownership more attainable for western residents.

Recommendation: The federal government should examine potential solutions to growing insurance challenges in collaboration with states and other key partners.

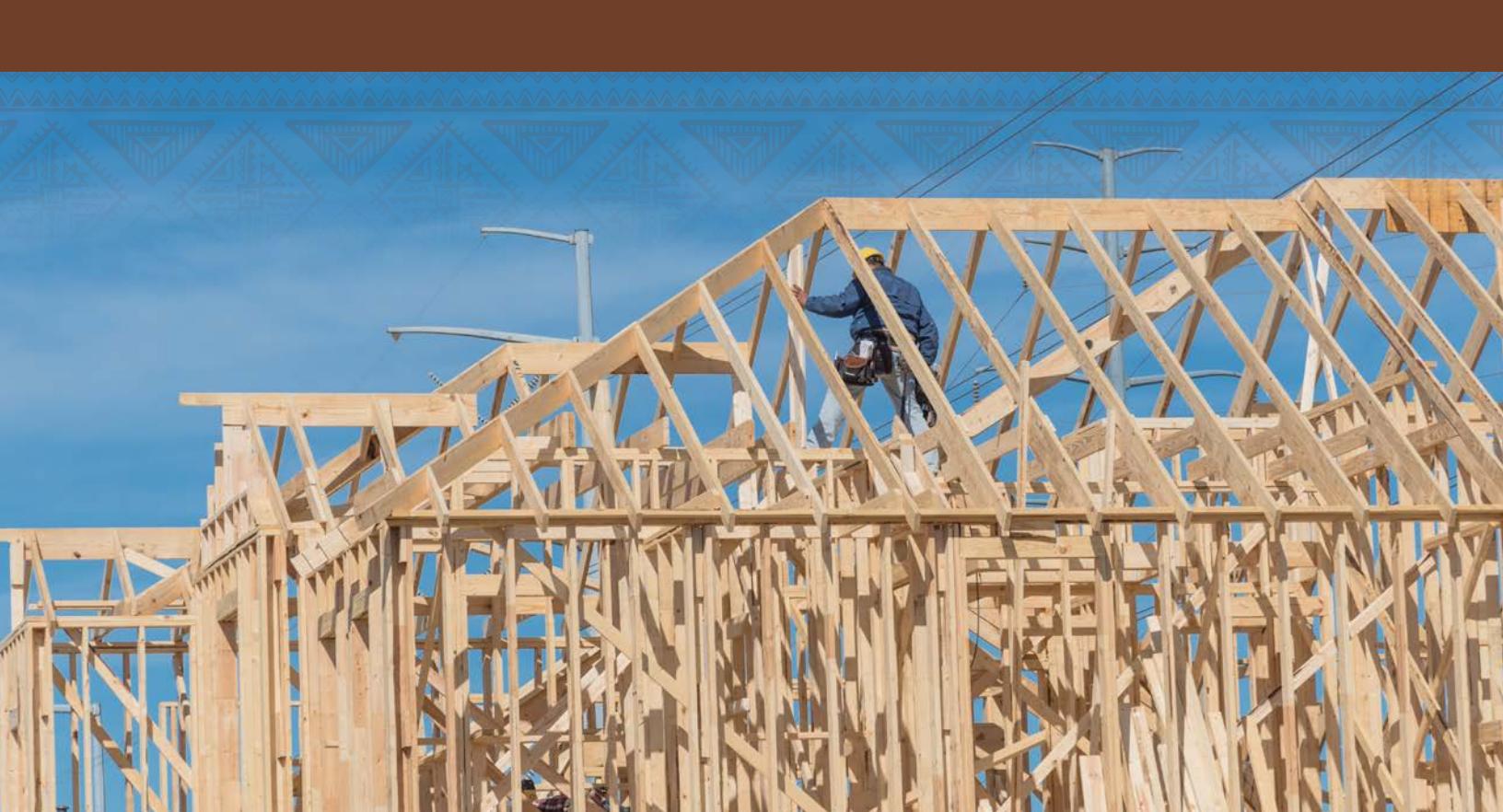
In many areas of the West, home insurance is unaffordable or even unavailable to individual homeowners. Insurance providers struggle to balance risk management with reasonably priced insurance offerings. Lenders typically require insurance to obtain a mortgage, making homeownership increasingly difficult.

The cost of insurance in some areas also presents challenges for affordable rental housing due to increases in property and casualty insurance rates for multifamily properties. Since there are limitations on the extent that subsidized affordable housing operators can raise rents to cover costs, they are left without an escape valve. Operators have been exiting the market and declaring foreclosure or bankruptcy when they are no longer able to run their properties or portfolios at cost, resulting in the loss of subsidized affordable housing units even before end-of-life or capital needs arise. While several states are considering interventions, the scope of the problem may be too extensive for smaller states to tackle alone, requiring a coordinated national effort to find lasting solutions.

Investing in Strategic, Innovative, and Data-Informed Initiatives Across the Housing Ecosystem

Recommendation: HUD and other federal agencies should provide technical assistance, capacity-building, and data collection and reporting





resources for housing. Congress should ensure that these types of support are proportionately reflected in program design and appropriations.

Federal capacity-building efforts and technical assistance for housing, primarily through HUD's Section 4 Capacity Building for Affordable Housing and Community Development Program, play a key role in strengthening the ability of communities and organizations that need it most to secure federal funding, attract private investment, and create new housing stock.

Additionally, local governments need resources and capacity to collect and share essential data on new construction projects, zoning and land use, local development fees, housing completions, actual rent prices, housing prices, and more. These sources of data are often inadequate, leaving policymakers to rely on outdated or incomplete federal datasets to fill in the gaps, which hampers housing decisions.

Recommendation: Congress should support the expansion of education and skills training opportunities for

the skilled construction workforce, including apprenticeships and career and technical education.

The federal government is the primary funding source for workforce systems in the states, primarily through the U.S. Department of Labor (DOL) and the Workforce Innovation and Opportunity Act (Pub. L. 113-128). The federal Office of Apprenticeship also provides support for registered apprenticeship programs. Historically, the federal government has allowed the states to set their own priority sectors, which gives much-needed flexibility. That said, Congress could also identify priority areas for competitive or formula funding, similar to the State Apprenticeship Expansion Formula Grants.

Recommendation: Congress should account for return-on-investment calculations in program design and appropriations and allocate a greater proportion of funding towards community resilience and mitigation efforts. Congress should ensure that home hardening and retrofitting are allowable uses of federal resources.

In existing policy, Western Governors call for federal legislation that reconsiders the important role of pre-disaster mitigation. Less than 5 percent of funding in previous mitigation programs could be used for critical activities such as community wildfire resilience.

As extreme weather events become more frequent, balancing resilience and affordability in housing development is essential. Integrating mitigation measures - such as structural modifications and landscape design - during new construction or through retrofitting and home hardening presents some of the most effective opportunities to enhance resilience.

Recommendation: The federal government should break down silos and promote interagency coordination and collaboration to maximize the impact of housing efforts. Congress should capitalize on opportunities wherever possible and appropriate to ensure that new programs and investments in workforce, infrastructure, and other areas can be used with existing housing programs and funding streams.



Nearly every federal department plays a role in housing. This includes the U.S. Department of Transportation (DOT), the U.S. Department of Health and Human Services (HHS), the U.S. Department of Energy (DOE), DOL, the U.S. Department of Justice (DOJ), the U.S. Department of Defense (DOD), and the U.S. Department of Veterans Affairs (VA). Given the deep interconnection between housing and a wide range of industries and sectors, addressing the crisis demands system-wide solutions that promote the most efficient use of resources and accommodate future growth. For example, many investments in the CHIPS and Science Act (Pub. L. 117-167), which is largely focused on semiconductor manufacturing, will require workforce housing. More broadly, housing is integral to any conversation about community and economic development.

Recommendation: Congress should pursue statutory changes to streamline the process of transferring appropriate federal properties to states, communities, and developers to address housing shortages while maintaining essential guardrails and protecting critical public assets.

More than a quarter of U.S. land, approximately 640 million acres, is federally owned. These lands are primarily located in 12 western states, where they cover roughly half of the overall area in those states. Western Governors' policy recognizes the important economic, recreational, and environmental benefits of federal lands. With the concentration of federal lands in the West, leveraging certain parcels for responsible housing development is an additional strategy to address affordable housing shortages.

Currently, there are three methods for federal land transfers in states other than Nevada: transfers under existing legislation, such as the Federal Land Policy and Management Act (Pub. L. 94-579); the direct federal purchase of non-federal lands within federal management areas under the Federal Land Transaction Facilitation Act (Pub. L. 106-248); and individual acts

of Congress. Each option, however, is complex and costly. Standardized practices at the federal level for building housing on appropriate publicly owned parcels would be a valuable tool.

Except for SNPLMA, these projects are currently done on an ad hoc basis with little guidance on how to maximize benefits for communities, and the American public, while protecting critical public assets. Established processes and deliberate coordination have helped improve the effectiveness of land transfers under the SNPLMA framework. For example, the Memorandum of Understanding (MOU) between the BLM and HUD for SNPLMA significantly accelerated projects by reducing the processing time from over six months to 60 days. Western Governors' policy urges the federal government to pass legislation facilitating the purchase of federal land by state or local governments at a reduced price under limited circumstances to increase the supply of residential housing and honor commitments to transfer land to state or local governments in a reasonable amount of time.

Recommendation: Congress should consider legislation to allow agencies beyond the U.S. Forest Service to lease certain federal lands for affordable housing used by federal employees and the local workforce.

Federal employees and local workers in rural and resort communities that are located near public lands face scarce housing options and soaring costs. Existing Western Governors' policy encourages Congress to address workforce housing needs in these areas. The U.S. Forest Service's leasing authority, which was established in the 2018 Farm Bill (Pub. L. 115-334), allowed the Forest Service to lease administrative land within municipalities to develop affordable housing for both Forest Service employees and local workers. The eligible sites were typically those with some form of housing or

storage infrastructure. While this authority expired in September 2024, the Expanding Public Lands Outdoor Recreation Experiences (EXPLORE) Act (Pub. L. 118-234), which passed at the end of 2024, reauthorized it and extended lease agreements from 50 to 100 years. Bipartisan legislation introduced during the last Congress sought to address similar challenges by allowing DOI to enter into agreements to lease federal land and adjacent land for the construction, rehabilitation, or management of rental housing for field employees and members of the public.

Recommendation: Congress and FTA should streamline regulations for transit-oriented housing development projects and explore other creative land transfer opportunities for affordable housing development.

"Joint development" is a strategy to promote transit-oriented development that maximizes the utility and value of the transit system and surrounding real estate while also providing community benefits. FTA offers grants or property for such projects. When federal funds are used to acquire land for a transit project, like a transit station, there is usually land remaining. FTA allows for the disposition of this property to local transit agencies. Historically, federal regulations have made transferring the remaining land difficult. In addition to reimbursing FTA for its contribution to the land costs, sales had to be posted to the Federal Register.

The National Defense Authorization Act for Fiscal Year 2022 (Pub. L. 117-81) created a new disposition option to transfer the property to a local government authority, nonprofit organization, or private entity without requiring reimbursement. To qualify, the project must use the land for transit-oriented development, increase ridership, and make at least 40 percent of the units affordable housing for 30 years. Even with these critical changes, barriers still exist for transit agencies and local governments.



PARTICIPANT ACKNOWLEDGMENTS

WGA thanks all the speakers who contributed their time and expertise to the initiative's workshops and webinars.

WGA Winter Meeting: Las Vegas, Nevada December 9-10, 2024

- Anne Cope, Chief Engineer, Insurance Institute for Business and Home Safety
- Dean Cameron, Director, Idaho Department of Insurance
- Frank Frievalt, Director, Wildland-Urban Interface Fire Institute, California Polytechnic State University
- Jess Molasky, Chief Operating Officer, Ovation Development Corporation
- Jon Raby, Nevada State Director, Bureau of Land Management
- Karen Collins, Vice President of Property and Environment, American Property Casualty Insurance Association
- Vinson Guthreau, Executive Director, Nevada Association of Counties

Utah Workshop: Salt Lake City, Utah December 17-18, 2024

- The Honorable Spencer Cox, Governor of Utah
- Ahmad Abu-Khalaf, Policy Research Director, Enterprise Community Partners
- Alex Horowitz, Director, Housing Policy Initiative, The Pew Charitable Trusts
- Alexis Pelosi, Office of the Secretary, U.S. Department of Housing and Urban Development

- Arnab Chakraborty, Dean, College of Architecture and Planning, University of Utah
- Bailey Thompson, Director, State and Local Government Affairs, National Association of Home Builders
- Ben McAdams, CEO, Putting Assets to Work & Former Member of Congress
- Brennen Brown, Managing Director, Development Finance Group, D.A. Davidson
- Cameron Diehl, Executive Director, Utah League of Cities and Towns
- Chris Gamvroulas, President, Ivory Development
- Chris Parker, Director, Perpetual Housing Fund
- Christina Oliver, Director, Housing and Community Development Division, Utah Department of Workforce Services
- Dawn Ramsey, Mayor, City of South Jordan
- Dejan Eskic, Senior Research Fellow, Kem C. Gardner Policy Institute, University of Utah
- Eduardo Mendoza, MAP Research Associate, California YIMBY
- Hamilton Boggs, Partner, McKinsey & Company
- Howard Headlee, President & CEO, Utah Bankers Association
- Justin Lee, Deputy Director, Utah League of Cities and Towns
- Kelly Farrell, Principal, Global Residential Practice Area Leader, Gensler

- Nick Norris, Planning Director, Salt Lake City
- Sean Berens, Deputy General Counsel, Office of Arizona Governor Katie Hobbs
- Stephen James, Chief Visioning Officer, Larry H. Miller Real Estate
- Stephen Whyte, Representative, Utah House of Representatives & Co-Chair, Commission on Housing Affordability
- Steve Waldrip, Senior Advisor for Housing Strategy and Innovation, Office of Utah Governor Spencer Cox

Oregon Workshop: Bend, Oregon January 15-16, 2025

- The Honorable Tina Kotek, Governor of Oregon
- Amy Warren, Board President & Founder, Thistle & Nest
- Andrea Bell, Executive Director, Oregon Housing and Community Services
- Ben Taylor, Vice President & Project Partner, Lincoln Avenue Communities
- Bob Worsley, Founder & Chief Executive Officer, ZenniHome
- Brian Rankin, Long Range Planning Manager, City of Bend
- Bryan Guiney, Oregon Field Office Director, U.S. Department of Housing and Urban Development
- Deborah Flagan, Vice President of Community Engagement, Hayden Homes
- Dick Anderson, Senator, Oregon Senate



- Doug Green, Program Manager, Community Planning Assistance for Wildfire, Headwaters Economics
- Jackie Keogh, Executive Director, RootedHomes
- Jeff Pemstein, Associate Vice President for Advocacy, Western Region, National Association of Home Builders
- Jill Rees, Deputy State Director, USDA Rural Development, Oregon
- Kelly O'Donnell, Chief Research and Policy Officer, Homewise
- Kil Huh, Senior Vice President, Government Performance, The Pew Charitable Trusts
- Kirsten Ray, Senior Management Analyst, U.S. Department of Housing and Urban Development
- Lisa O'Brien, Executive Director, Taos Housing Partnership
- Margaret Van Vliet, Principal, Trillium Advisors
- Mary Kyle McCurdy, Associate Director & Managing Attorney, 1000 Friends of Oregon
- Max Wei, Staff Scientist, Energy Analysis and Environmental Impacts Division, Lawrence Berkeley National Laboratory
- Megan Yonke, Senior Housing Policy Advisor, Office of Colorado Governor Jared Polis
- Melanie Kebler, Mayor, City of Bend
- Olivia Barrow Strauss, Vice President, Global Philanthropy, JPMorganChase
- Qualen Carter, Assistant Vice President of Oregon & Community Lending Manager, Umpqua Bank
- Russell Grayson, Chief Operations Officer & Assistant City Manager, City of Bend
- Scott Nordquist, Vice President of Resource Development, Bend-Redmond Habitat for Humanity

- Sean Edging, Senior Housing Planner, Oregon Department of Land Conservation and Development
- Seth Leonard, Program Manager, Center for Multifamily Housing Preservation, Housing Assistance Council
- Talia Kahn-Kravis, Assistant Director of Homeownership Programs, Oregon Housing and Community Services
- Vikki Breese-Iverson, Representative, Oregon House of Representatives
- Will Cooper Jr., Chief Executive Officer, WNC & Associates

- Arth Analytics
- Association of Washington Business
- Bear River Association of Governments
- BEM Int'l
- Bend Chamber of Commerce
- Berkadia
- Billings County, North Dakota
- Bi-State Regional Commission
- BOXABL
- Builders Patch
- Building Decarbonization Coalition
- Cache County, Utah
- CARE Communities
- Central Oregon Intergovernmental Council (COIC)
- Chaffee Housing Authority
- City of Bend, Oregon
- City of Cheyenne, Wyoming
- City of Moab, Utah
- City of Redmond, Oregon
- City of Santa Fe, New Mexico
- Colliers International CRE
- Colorado Department of Local Affairs
- Concepts, Inc./SEED
- Cowen Consulting
- CVS Health
- Deloitte
- Deschutes County, Oregon
- Diana T. Myers & Associates
- Dominium
- Dvele
- EDCO
- Edison Electric Institute
- Energy Trust of Oregon
- Enterprise Community Partners
- Esri
- Federal Reserve Bank of San Francisco
- GovOS
- H2
- Habitat for Humanity of Oregon
- Hayden Homes
- Headwaters Economics
- Housing Oregon
- Housing Works
- Idaho National Laboratory
- Intel

**Webinar:
Rethinking Rental Policy
March 18, 2025**

- Benjamin Preis, Director, National Housing Crisis Task Force & Senior Research Fellow, Nowak Metro Finance Lab, Drexel University Lindy Institute for Urban Innovation
- Cheryl Cohen, Housing Division Administrator, Montana Department of Commerce & Executive Director, Montana Board of Housing
- Megan Yonke, Senior Housing Policy Advisor, Office of Colorado Governor Jared Polis
- Robert Henson, Senior Housing Policy Specialist, National Council of State Housing Agencies

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- 1Spatial USA
- Advanced Energy United
- Akana
- American Hotel & Lodging Association
- American Property Casualty Insurance Association
- Ann Walker Consulting
- Arnold Ventures



- International Association of Fire Fighters
- Iron Workers International
- Jackson County Community Long-Term Recovery Group
- JPMorganChase
- JZW Architects
- Kearns & West
- Laborers' International Union of North America (LIUNA)
- Lawrence Berkeley National Laboratory
- Lifelong Memories Made
- LIUNA Local #295
- Lincoln County, Wyoming
- Logan YIMBY
- LOR Foundation
- M.L. Anderson Advisory Service
- Mainspring Innovation
- Modern Design+Construction
- MODS PDX
- Montana Building Industry Association
- Montana Cooperative Development Center
- Montana Department of Labor and Industry
- Montana Environmental Information Center (MEIC)
- Montana State University Extension
- Mountain Lands Community Housing Trust
- National Association of Counties
- National Association of Home Builders
- National Governors Association
- National Housing Crisis Task Force
- National Oceanographic and Atmospheric Administration
- NeighborWorks Umpqua
- Nevada Housing Division
- New Mexico Energy, Minerals, and Natural Resources Department
- New Mexico Indian Affairs Department
- New Mexico Office of Housing
- Northeast Oregon Economic Development District
- Northwest Housing Alternatives

- Nova Climate Construction Tech
- Office of Arizona Governor Katie Hobbs
- Office of New Mexico Governor Michelle Lujan Grisham
- Office of Oregon Governor Tina Kotek
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- Office of Utah Governor Spencer Cox
- Office of Washington Governor Bob Ferguson
- Office of Wyoming Governor Mark Gordon
- Oregon Department of Land Conservation and Development
- Oregon Home Builders Association
- Oregon Housing and Community Services
- Oregon Senate
- Owens Corning
- Oxford Architect
- Pacific Housing
- Pacific Northwest Economic Region (PNWER)
- Powers Law
- Property Reserve
- ReMo Homes
- REMAX Peaks
- Red Lodge Area Community Foundation
- Rural Community Assistance Corporation
- Rural Voices for Conservation Coalition
- rPlus Energies
- Santa Fe Area Home Builders Association/Northern New Mexico Builders Association
- Santa Fe Gateway Alliance
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- Shanahan and Associates
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- Snowy Mountain Development
- Southwest Energy Efficiency Project

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- Town of Frisco, Colorado
- U.S. Department of Agriculture
- U.S. Department of Housing and Urban Development
- U.S. Department of Veterans Affairs
- U.S. Economic Development Administration
- UCLA Latino Policy & Politics Institute
- USDA Rural Development
- Utah Clean Energy
- Utah Department of Workforce Services
- Utah Geospatial Resource Center
- Utah Governor's Office of Planning and Budget
- Utah Home Builders Association
- Utah State University
- Utah Transit Authority
- Verify Rhyme
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- Vibrant Planet
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- Warm Springs Housing Authority
- Washington & Oregon Properties
- Wells Fargo
- Western Interstate Commission for Higher Education
- Western Rural Development Center
- Western States Water Council
- WNC & Associates
- Working Homes



THANK YOU TO OUR INITIATIVE PARTNERS



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