

DRAFT

June 12, 2024

Director Andrea Bell
Oregon Housing and Community Services
725 Summer Street NE B
Salem, OR 97301

Re: CDBG-DR (Re-Oregon) Planning, Infrastructure, and Economic Revitalization (PIER) Program

The wildfire impacted partners listed on this letter request that Oregon Housing and Community Services (OHCS) grant an exemption of 70% maximum approval of projects by the PIER selection committee as indicated in PIER Guideline section 2.1.1.

This September will conclude four years since the fires devastated eight communities throughout Oregon and two years since the Action Plan was approved by the Department of Housing and Urban Development (HUD).

Due to local procurement laws and the requirement to be compliant with federal HUD guidelines, deploying these funds for planning or other services will require additional time.

As it is now, most communities will be unable to deploy these funds for construction projects in 2024 due to the time required to create requests for proposal and then deploy contracts as well as the limited construction window many parts of Oregon experience due to weather conditions.

As of this date, very little of the PIER program funding has actually made it into the fire impacted communities. If OHCS does not grant an exemption of the 70% maximum approval policy, our communities will have to wait even longer for the full amount that they are entitled to.

We understand that there are hundreds of millions of dollars for the HARP and HOP programs that are available to our communities as well. However, HARP recently deployed and many of the applicants have been unable to meet eligibility requirements of the program. This is because either they are seeking reimbursement, or they fail to meet income restrictions of the 80% AMI. Some applicants that are making it past eligibility are seeking funding for things that do not meet the intent of the program in any way shape or form. As result very little funding from these programs has actually made it into our communities.

In the CDBG-DR action plan, there is more than \$24 million allocated for administration and planning tool costs. This is more than half of the total allocation for the PIER program. The retention of the 30% is not a financial resource issue.

Lastly, HARP is and will likely continue to be underutilized due to the delayed deployment of the program and the success that many communities have already had in their recovery. The HOP program is designed but not yet deployed. It is reasonable to expect that this program will be underutilized as well, at least for the intended purpose of getting renters back into their respective pre-fire communities.

As such, we are hoping that OHCS recognizes the opportunity to unilaterally withdraw the requirement to withhold 30% of PIER funds from fire impacted communities and let local governments work in our communities to continue the great work that has already been done.

Sincerely,



Clackamas County
Douglas County
Jackson County
Klamath County
Lane County
Lincoln County
Linn County

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