

Clackamas County

DRAFT 2022 – 2027 Assessment of Fair Housing Report

Housing Authority of Clackamas County and

Community Development Division



Visit www.hud.gov/fairhousing or call the HUD Hotline
1-800-669-9777 (English/Español) 1-800-927-9275 (TTY)



Fair Housing Council of Oregon Website: www.FHCO.org



I. Executive Summary

The Fair Housing Act was enacted in 1968. Recent changes to the Affirmatively Furthering Fair Housing Rule 24 CFR Parts 5, 91, 92, 570, 574, 576 and 903 restoring certain definitions and certifications were finalized by HUD on June 31, 2021. The 2016 Assessment of Fair Housing (AFH) in Clackamas County relied on census data provided by the U.S. Department of Housing and Urban Development (HUD), local information and community feedback through surveys and public meetings. The AFH was conducted jointly by the Housing Authority of Clackamas County and the Community Development Division.

HUD’s AFH process has four nationwide fair housing goals:

- 1) Reduce segregation, and build on the nation’s increasing racial, geographic and economic diversity.
- 2) Eliminate racially and ethnically concentrated areas of poverty.
- 3) Reduce disparities in access to important community assets such as quality schools, job centers, and transit.
- 4) Narrow gaps that leave families with children, people with disabilities, and BIPOC with more severe housing problems, aka, disproportionate housing needs.

Beginning in September 2021, a workgroup of Clackamas County Health, Housing and Human Services (H3S) housing and social services staff reviewed previous Fair Housing Goals and accomplishments. H3S staff also considered results from the following recently completed plans and studies:

- Clackamas County Metro Bond Local Implementation Plan
- 2021 County DTD Expanding Housing Choice Survey
- 2019 Homelessness and Housing Affordability
- Performance Clackamas Managing for Results
- 2018 State of Oregon Fair Housing Report
- 2018 County Housing Needs Assessment
- 2021 Coalition of Communities of Color Community Engagement Report

Based on the information in these housing surveys and reports, historical data and feedback from the County’s Housing Rights and Resources Program, a draft set of goals and strategies were developed as a starting point for community consideration and discussion.

Contributing factors to the fair housing conditions were identified in 2017 and 2021 after a review of HUD data, comments during public meetings, community survey data and local housing data. Representatives of the Legal Aid Services of Oregon, the Fair Housing Council of Oregon, the Housing Authority of Clackamas County (HACC) and the Community Development Division formed a work group to review results of surveys,

community meetings and available census data to select the contributing factors listed below:

Contributing Factors to fair housing conditions listed in priority order include:

1. Lack of affordable, accessible housing in a range of unit sizes.
2. Availability of affordable units in a range of sizes.
3. Displacement of residents due to economic pressures.
4. Community Opposition (to affordable housing developments).
5. Site selection policies, practices and decisions for publicly supported housing.
6. Lack of assistance for housing accessibility modifications.
7. Private Discrimination.
8. Lack of public fair housing enforcement.
9. Lack of resources for fair housing agencies and organizations.
10. Land Use and Zoning Laws.
11. Inaccessible sidewalks, pedestrian crossings, or other infrastructure.

The process of analysis to select the 2022-2027 AFH Goals for the jurisdiction was a series of meetings and discussions by the work group. The workgroup also developed a community survey which was distributed in 3 languages. 306 persons responded to the proposed goals and strategies listed in the survey. Workgroup members reviewed past fair housing efforts, clarified the contributing factors in the jurisdiction and in the Portland metro region and discussed available local data including census data and local reports. After review of the available data and discussion of what data was not available, work group members agreed to the following goals and strategies in priority order:

Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County.

Strategies:

- 1.A:** Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units and ensure that those units will last for years to come.
- 1.B:** Maximize the number of households receiving long term and short term rental assistance from local, state and federal programs.
- 1.C:** Evaluate zoning changes & incentives for building affordable housing including rezoning of vacant commercial properties into mixed-use buildings or using eminent domain or other methods to buy vacant properties to be used for housing programs.

Goal 2: Expand fair housing outreach, education, and enforcement.

Strategies:

- 2.A:** Increase fair housing education for staff, landlords & community partners.
- 2.B:** Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions.
- 2.C:** Work in collaboration with partners to enforce fair housing law.

2.D: Continue operating the Housing Rights and Resources line, which is a partnership between Clackamas County Social Services, Clackamas County Community Development, Legal Aid Services of Oregon, and Fair Housing Council of Oregon to provide information about fair housing law to landlords and tenants in Clackamas County.

Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.

Strategies:

3.A: Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.

3.B: Minimize barrier and ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes.

These AFH goals will become part of planning and performance reporting documents for the Housing Authority and the Community Development Division for the 2022 through 2026 program years. These new AFH goals are similar to fair housing goals selected in 2017 listed here:

1. Develop new housing units with long-term affordability for a broad range of low-income households with an emphasis on dispersal of affordable housing.
2. Increase accessibility to affordable housing for persons with disabilities and single parent familial status households. (households with children under 18 yrs.).
3. Improve access to housing and services for all protected classes.
4. Enforce Fair Housing laws and Increase public understanding of Fair Housing laws.
5. Coordinate Fair Housing Advocacy and Enforcement Efforts among regional partners
6. Ensure that all housing in Clackamas County is healthy and habitable.

Since 2017 the significant changes that have impacted Clackamas County include a sharp increase in housing demand due to the number of new residents moving to the Portland metro area including Clackamas County. In 2020 alone numerous factors have impacted our county including: the 2020 COVID pandemic causing health and economic difficulties, a Forest Fire destroying numerous homes in a rural town, an Ice Storm and a Heat Dome hot weather event that caused some deaths in the metro area. The impacts of the COVID pandemic have caused employment losses that have put many households in danger of eviction and homelessness. County and state programs have provided some rent assistance however many people are still not able to access stable housing.

Assessment of Fair Housing Tool

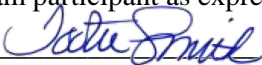
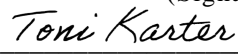
Table of Contents

I.	Cover Sheet	
II.	Executive Summary.....	4
III.	Community Participation Process.....	6
IV.	Assessment of Past Goals and Actions.....	11
V.	Fair Housing Analysis.....	15
	A. Demographic Summary.....	15
	B. General Issues.....	17
	i. Segregation/Integration.....	17
	ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)...	21
	iii. Disparities in Access to Opportunity.....	25
	iv. Disproportionate Housing Needs.....	35
	C. Publicly Supported Housing Analysis.....	40
	D. Disability and Access Analysis.....	47
	E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis...	52
VI.	Fair Housing Goals and Priorities.....	58
VII.	Appendices	
	Appendix A – List of Local Data Sources and Summary	
	Appendix B – Survey results and summary of comments	
	Appendix C - Public Comments	

I. Cover Sheet

1. Submission date:
2. Submitter name: **Clackamas County Housing and Community Development Division**
3. Type of submission: **Joint Submission**
4. Type of program participant(s): **Consolidated plan participant and PHA**
5. For PHAs, Jurisdiction in which the program participant is located: **Clackamas County, Oregon**
6. Submitter members (if applicable): NA
7. Sole or lead submitter contact information:
 - a. Name: **Mark Sirois**
 - b. Title: **Project Coordinator**
 - c. Department: **Health, Housing and Human Services Department,
Housing and Community Development Division**
 - d. Street address: **2051 Kaen Road #245**
 - e. City: **Oregon City**
 - f. State: **Oregon**
 - g. Zip code: **97045**
8. Period covered by this assessment: **July 1, 2022 to June 30, 2027**
9. Initial, amended, or renewal AFH: **Renewal AFH**
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

 _____ (Signature)	<u>04/14/2022</u> (date)
 _____ (Signature)	<u>4/14/2022</u> (date)

12. Departmental (HUD) acceptance or non-acceptance:

(Signature) (date)

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III. Community Participation Process

- 1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.**

The Assessment of Fair Housing (AFH) survey in English, Spanish and Russian/Slavic was developed in November 2021 by Health, Housing and Human Services Department (H3S) staff from the Housing Authority of Clackamas County and Community Development Division. The Community AFH online survey was open for 6 weeks from December 1, 2021 to January 15, 2022.

AFH Outreach was conducted through direct email to the homeless services Continuum of Care networking group, over 400 community members and agencies, all public housing residents and recipients of Housing Choice Vouchers. The AFH survey was also advertised by the County's Public and Government Affairs office through social media including Facebook and Twitter.

Housing Authority staff also distributed AFH survey notices to all public housing residents and households with Housing Choice Vouchers (Section 8).

The HACC Resident Advisory Board was provided a presentation of the HACC Annual Plan and the 5-Year Plan which included the AFH draft goals and executive summary in Attachment C of both plans on January 11, 2022. The HACC Resident Advisory Board members were given the opportunity and encouraged to provide comments on all plans and goals. Detailed meeting minutes are included in the HACC Annual and 5-Year Plans. Furthermore, the HACC Annual Plan and the 5-Year Plans were made available for public review and comment from January 17, 2022 until March 6, 2022.

A Notice of Comment was published on February 3, 2022 in the newspapers of record with a public comment closing date of March 18, 2022. The notice provided the website address and person to contact to provide comments and feedback. Email notices were sent to the Citizen Participation list and the homeless Continuum of Care list on January 31, 2022. The Draft AFH Plan was posted on the Community Development Division website on January 27, 2022.

A draft of the AFH was posted to the Housing Authority of Clackamas County website on February 1, 2022 and all residents were notified that the AFH draft plan had been posted on the same date. Clackamas County also posted the survey on social media feeds such as Facebook and Twitter.

2. Provide a list of organizations consulted during the community participation process.

H3S staff sent email solicitations to participate in the survey to the 75 member Citizen Participation list, the 100 member Continuum of Care list, the Housing Authority of Clackamas County residents, and to county and community Hispanic outreach workers.

H3S staff contacted numerous community groups directly to inquire about presenting assessment of fair housing information, request that people take the survey and to solicit comments about fair housing in Clackamas County.

Groups contacted include:

- Baby Link, Providence Medical Center
- Northwest Family Services
- Second Home
- Firwood Elementary Scholl
- Job Corps
- All School District Homeless Liaison staff
- Estacada High School
- Clackamas Womens Services
- Antfarm
- City of Milwaukie
- Oregon Health Insurance Marketplace
- St. Paul Methodist Church
- Todos Juntos
- Storyline Community
- Clackamas County Behavioral Health
- A Safe Place
- Head Start Centers – Childrens Commission
- Living Room youth services
- Orchid Health Wade Creek Clinic
- Clackamas County Bank
- Oregon Law Center
- Hope City
- Sandy Senior Center
- Lines for Life
- Love One
- Estacada Watch
- Impact Health free clinics
- Clackamas Workforce Partnership
- Estacada Baptist Church
- Sandy News newspaper

- Second Home faith based provider
- Care Oregon health services providers
- Clackamas Community College
- Bull Run Foodshed Alliance
- Sandy Community Action Center
- Dev NW housing and housing services
- North Clackamas School District
- Fraternal Order of Eagles
- Love Inc.
- Department of Human Services, Oregon State
- Kiwanis Club
- Cascade Aids Project
- AmeriCorps – Clackamas County
- Impact Northwest
- Mt. Hood Community College
- Estacada Public Library
- Estacada Area Foodbank
- Ignite Ministries
- Rotary Club
- Seventh Day Adventists
- Safe Place Family Justice Center
- Clackamas Volunteers in Medicine
- Clackamas County Sheriff's Office
- North Clackamas Parks and Recreation
- Oak Grove Methodist Church
- Metropolitan Family Services
- Christ the Vine Lutheran Church
- Family Assistance at Oregon National Guard
- Oregon Health Authority
- El Programa Hispano
- Turning Point Church
- Legacy health Services
- Lifeworks Northwest
- Aging and People with Disabilities – Oregon State
- Kings Cupboard
- Hope City Church
- Easter Seals
- Trillium Behavioral Health
- Central City Concern
- Oregon Trail School District
- Parrott Creek Child and Family Services
- Springwater Presbyterian Church
- St. Vincent DePaul
- Goodwill Job Connection

**3. How successful were the efforts at eliciting meaningful community participation?
If there was low participation, provide the reasons.**

The AFH Community Survey resulted in 306 English responses and 2 Spanish response for a total of 308 participants in the Fair Housing Survey.

Who responded to our survey? 95% were residents of Clackamas County. 73% identified themselves as private citizens.

- 18% declined to answer the question of their race,
- 69% identified as White and
- 9.26% identified as either Black, American Indian, Asian or Multiracial.
- 7.8% identified as Hispanic,
- 18% declined to answer their ethnic identity and
- 74% said they were not Hispanic.
- 66.4% (202) were female,
- 12% (37) preferred not to say their gender and,
- 1.6% (5) identified as Non-binary.

The full range of ages were represented:

- 18 to 24 year olds were 4% of all respondents,
- 25-34 year olds were 14.8%,
- 35-44 year olds were 27.6%,
- 45-54 year olds were 17.7%,
- 55-64 year olds were 22% and
- 42 people or 13.8% were 65 years or older.

Households with someone with a disability represented 26.5% of all respondents and 73.5 of households did not have someone with a disability.

If we assume households had at least 2 people per family, the income levels of AFH survey respondents was mostly 48% (135) above the Moderate Area Median Income level of \$61,900 per year or \$5,158 per month. Based on either Extremely Low income of less than \$23,200 per year or \$1,933 per month, Very Low income of less than 38,700 per year or \$3,225 per month and Moderate income of less than \$61,900 per year or \$5,158 per month.

- 12.9% (36) had Extremely low household incomes.
- 38.7% (108) had Very low to Moderate incomes
- 48% (135) had above the median household income

Did respondents agree or disagree with the Proposed Goals?

Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County. 72.54% of respondents either agreed or strongly agreed with the goal. 11.4% were neutral

Goal 2: Expand fair housing outreach, education, and enforcement. 72.5% of respondents (201 people) either agreed or strongly agreed with the goal. 17.1% were Neutral.

Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes. 62.6% of respondents (188 people) either agreed or strongly agreed with the goal. 16.3% (49 people) were Neutral.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

The Survey comments on each of the proposed AFH goals and strategies ranged from highly supportive to “get the awful government out of the housing market”. Many people wanted more affordable housing units built in the county so that people would have more housing choices as well as lower rents. Many people wanted more accessible housing units and reduced rent so that they could afford to live comfortably in their community. Several comments were in support of more multifamily units while others were opposed to any new housing in their rural communities. There was also an expressed desire to have more assistance and opportunities for first time homebuyers to enter the housing market.

There were 2 public comments on Draft AFH Goals regarding here....

All comments were accepted.

The 45-day public comment period on the draft AFH and AFH goals ended on March 21, 2022. Only two comments were submitted and both were accepted.

IV. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress has been made toward their achievement;

Clackamas County’s 2017 Analysis of Impediments (AI) to Fair Housing Choice identified five broad impediment areas. The impediment areas were identified based on analysis of existing data and broad public input. The impediment areas are also consistent with conclusions about areas of impediments to fair housing choice drawn in the Clackamas County 2012 AI and those identified in neighboring counties and cities. Efforts on the 2017-2021 AFH goals have been partially achieved:

Goal 1 was to **Develop** new housing units with long-term affordability for a broad range of low-income households with an emphasis on dispersal of affordable housing. This goal has been achieved through several avenues but continues to be a goal.

Goal 2 to **Increase** accessibility to affordable housing for persons with disabilities and single parent familial status households was also achieved but continues to be a goal since more accessible units are needed.

Goal 3 to **Improve** access to housing and services for all protected classes was somewhat achieved and continues to be a goal to improve access for all protected classes

Goal 4 to **Enforce Fair Housing** laws and Increase public understanding of Fair Housing laws was achieved through tenant and landlord training and also continues to be a goal

Goal 5 to **Coordinate Fair Housing** Advocacy and Enforcement Efforts among regional partners is ongoing and continues to be a goal.

Goal 6 to **Ensure** that all housing in Clackamas County is healthy and habitable. This goal has been discontinued due to lack of funding for a dedicated housing inspector and lack of support for a county-wide program.

- b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and**

Housing Rights and Resources Program (Goals 1 and 2):

H3S provides funding to operate a Housing Rights and Resources (HRR) program in Clackamas County. The HRR program provides information and referral services for persons seeking assistance with fair housing issues, information about affordable housing, homeless prevention services, landlord/tenant disputes rental assistance, and emergency housing needs.

The HRR program develops and distributes documents related to fair housing laws and issues, landlord/tenant disputes, and the eviction process, in English and various translations for use by non-English speakers. The HRR program also works with tenants and landlords to provide information and training on fair housing laws to avoid unlawful evictions. HRR program staff work with the social service agencies, in-house housing programs and shelters in Clackamas County to assure that clients with fair housing questions are referred for information and assistance. Bilingual HRR staff provide fair housing information and services to Spanish speaking residents of Clackamas County.

The HRR program subcontracts with the Fair Housing Council of Oregon (FHCO) and Legal Aid Services of Oregon (LASO) to provide or secure fair housing services that includes:

- legal representation for persons whose housing rights have been violated,
- development of any additional fair housing collateral materials to be used to educate professionals in housing-related professions and,
- training sessions for professionals in housing-related arenas.

Integrative Patterns are promoted (Goal III)

The Community Development Division (H3S) has limited staffing and resources to promote integrative housing patterns in the 16 cities and towns in the jurisdiction. The County will continue to work with partners to explain the need for a range of housing options particularly for elderly and disabled persons living on fixed incomes.

The potentially harmful unintended consequences for lack of progress on this goal has been that communities have not had the housing options available for their residents and as such residents needed to move to find housing.

All rental housing is habitable (Goal V)

This goal was not achieved. The County considered the feasibility of establishing a habitability standard in multi-family housing units over a certain number of units similar to a neighboring jurisdiction's rental housing habitability standard. This initiative has since been dropped by County due to lack of funding, lack of support from the general public and other priorities such as roads, current housing demands and the current rapid growth of new housing market. The areas identified as having "High Concentrations" of low-income persons and ethnicities do contain a large number of rental units and mobile home parks.

The potentially harmful unintended consequences for not attaining this goal has been the possibility of low-income and vulnerable populations living in substandard or unhealthy housing due to lack of housing availability and lack of resources to address rental unit habitability issues. This goal was not included in the new set of goals.

REGIONAL EFFORTS (Goals 4 and 6)

Clackamas County has met quarterly with regional partners to coordinate fair housing efforts, data collection, training and events. Regional partners include: Multnomah County, Washington County, Clark County (WA), City of Portland, City of Gresham, and the City of Beaverton. Over the last 2 years due to COVID and various competing priorities these meetings have not happened as scheduled. However there is a new effort to coordinate

homeless services across 3 counties due to Metro Bond housing and homeless services funds.

Regional partners intend to move to a regional Analysis of Impediments to Fair Housing study and regional data collection in order to plan more effective training events and strategies to reduce housing discrimination and increase housing choice for residents in the Portland metropolitan area housing market. Regional partners also hope to align their fair housing efforts with the public housing authorities plans to increase access to housing.

The potentially harmful unintended consequences for not attaining this Integration goal has been the possibility of low-income, protected classes and, vulnerable populations limited access to housing choices in the Portland metro area. Limitations may be due to varying levels of information and training in different communities based on different contract requirements, different expectations and different types of services provided.

Due to COVID impacts on public meetings and other competing work assignments, Clackamas County staff have discontinued participating in regional meetings to coordinate efforts however, regional partners continue to work of homelessness issues and to support the efforts of the Fair Housing Council of Oregon to address fair housing advocacy in the Portland metro region.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

Clackamas County staff meet quarterly with regional partners on an in-formal basis to coordinate fair housing efforts, data collection, training and events. Regional partners include: the State of Oregon, Multnomah County, Washington County, Clark County (WA), Clackamas County, City of Portland, City of Gresham, and the City of Beaverton.

Regional partners intend to move to a regional Assessment of Fair Housing and regional data collection in order to plan more effective training events and strategies to reduce housing discrimination and increase housing choice for residents in the Portland metropolitan area housing market. Regional partners also hope to align their fair housing efforts with the public housing authority plans to increase access to housing.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The Clackamas County jurisdiction has a continued need for fair housing information and training for tenants and landlords as the tenants and landlords transition in an out of residential properties. The jurisdiction and regional partners acknowledge that the Portland metro area is one housing market and that our efforts must be coordinated in order to be effective. Our regional fair housing organization is the Fair Housing Council of Oregon (FHCO). The organization continues to expand and improve on its training and services. A recent Oregon state law now forbidding discrimination by income source

(Section 8) has provided a new opportunity for FHCO to promote fair housing and educate the area landlords and property managers.

Fair Housing Education, Training and enforcement will continue as a goal for our jurisdiction and the region. Fair Housing Education is an ongoing process for both tenants and landlords. Recent data on the types of complaints processed by FHCO indicate that persons with disabilities have filed 46% of all complaints. This complaint data indicated that persons with disabilities specifically need to be included in our Fair Housing goals.

The jurisdiction will continue to work with tenants, property managers and landlords to clarify rights and responsibilities of both renters and landlords. The jurisdiction will continue to support the efforts of the Fair Housing Council of Oregon to promote fair housing and to clarify the state and federal fair housing laws for the general public.

The new AFH goals have a more direct focus on examination of public housing internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

The analysis below is limited due to several factors including: lack of new data from HUD, lack of staffing and resources to gather updated census information and an international COVID pandemic that curtailed many public meetings and activities.

Clackamas County's population demographics compared to the Portland metro region represented in the Census Bureau Statistical Area (CBSA) reveals that in 2010 Clackamas County was 8% more white than the region, about 3% less Hispanic, 2% less Black, 4% less foreign born and 2.7% less LEP than the Portland metro region.

The 2010 census results show that in twenty years, Clackamas County has increased the overall population by 65,000 people. The County has become less white (85%), more Hispanic (from 2% to 7.7%), the percentage of foreign born persons has double from 4.1% to 8.4% and the percentage of LEP persons has more than doubled from 1.8% to 4.5%. The Black population has remained below 1% of Clackamas County since 1990. During the same 20-year period the Portland metro region has seen a population increase of 630,000 to a total of over 2.1 million people. The white population in the Portland metro region decreased from 90% to 76% while the Black population remained at 2.7%. The Portland CBSA regional Hispanic population increased by just under 200,000 people from 3.3% to 10.8% of the population. The foreign born population increased from 5.8% to 12.6% and the LEP population

increased to over 160,000 people from 3% to 7.2% of the population in the Portland CBSA region.

Persons with disabilities are represented proportionally in Clackamas County in comparison to the Portland CBSA. Persons with hearing difficulties are 4% of the County while represented regionally at 3.69%. Persons with vision difficulties are 1.6% of the County while regionally the percentage is 1.99. Persons with cognitive difficulty are 4.6% of the County while the region has 5.27% with cognitive difficulty. Persons with ambulatory difficulty in the County are 6.1% of the population while 5.99% of the region has ambulatory difficulty. Persons with self-care difficulty are 2.56% of the County and 2.47% of the region. Persons with independent living difficulty are 4.1% of the County and 4.35% of the region. The examination of the disability type reveals that there is no significant difference between the County and the Portland CBSA region by any particular disability type.

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

Most of the 16 cities and towns in Clackamas County are primarily comprised of homeowners in single family homes with some areas zoned for multi-family or mixed use housing developments. The unincorporated portions of Clackamas County that are in urban areas are also mostly comprised of single family homes. Most of the jurisdiction's multi-family housing renter-occupied properties are located in the Northwest corner of Clackamas County neighboring on the City of Portland to the North and Washington County cities of Beaverton and Tigard to the west.

Clackamas County has 16 cities and towns that are primarily comprised single family homes and large un-incorporated areas that are considered urban areas. The area known as Jennings Lodge/Oak Grove is an un-incorporated area that is estimated to contain a population of 36,000 people. Based on 2007-2011 CHAS data, 69% (108,137 units) of the residential properties in Clackamas County are 1 unit detached structures. 4% of residential properties are single unit attached structures. 4% are in 2-4 unit structures, 10% (15,289 units) are in 5-19 unit structures and 7% (11,174 units) of residential properties are in developments of 20 or more units. Mobile homes, boats, Recreational Vehicles and vans are 4% of residential properties.

Areas zoned as High Density Residential (HDR) are located in areas that have also been identified as having concentrations of poverty and ethnicity.

A review of single and multi-family housing building permits from January 2006 to June 2016 reveals that 3,435 permits were issued for single family homes throughout the jurisdiction while 220 permits were issued for multi-family homes of duplexes, 3 or 4 family unit developments and developments with 5 or more units. 47.7% of the multi-family permits (105 permits) were issued in the Clackamas zip code which is an area South of Happy Valley, east of Hwy 205 and north of the Clackamas River.

11.4% of multi-family permits (25 permits) were issued in Molalla and another 11.4% (25 permits) were issued in Milwaukie.

Of the 3,435 single family permits issued in ten years, 16.51% were issued in the Clackamas zip code (567 permits). 408 permits were issued in Oak Grove/Jennings lodge zip code (11.9% of single family permits). Oregon City had 298 permits issued or 8.68% of the total, Canby had 282 permits issued 8.21% of the total and, Molalla had 246 permits issued 7.16% of all single family permits. The communities with over 100 single family permits each included: Sandy (187), Estacada (167), Boring (146), Happy Valley (125), West Linn (109), and Damascus (110). The housing permits data provided by the county transportation and planning department.

Regionally, as detailed in Metro's Equitable Report January 2016 most of the housing units since 1998 have been built in urban centers of Portland, Hillsboro, Beaverton and Tigard.

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

Racial/Ethnic Dissimilarity Trends demonstrates that the segregation levels for all races and ethnicities in Clackamas County have remained low over the 20-year period between 1990 and 2010. Any dissimilarity level that is below 40 represents a low level of segregation. Dissimilarity levels between 40 and 54 represent a moderate level of segregation and levels over 55 indicate a high level of segregation. The highest level of segregation is between Asian or Pacific Islanders and Whites at 39.65. The second highest level of segregation is between Blacks and Whites at 35.35. The third highest level of segregation is between Hispanic and Whites at 31.03.

In the Portland metro region the Black population had a high level of segregation at 63.52 in 1990. All other races and ethnicities in the Portland metro region had low levels of segregation in 1990. Dissimilarity trends between 1990 and 2010 indicate that the segregation in Clackamas County has remained low for all ethnicities and races at levels less than 40. The highest level of segregation in 1990 was between Blacks and Whites at 29.56. This level of segregation has increased to 35.35 but has been surpassed by the segregation level between Asians or Pacific Islanders and whites with a level of 39.65.

b. Explain how these segregation levels have changed over time (since 1990).

Dissimilarity trends between 1990 and 2010 indicate that the segregation in Clackamas County has remained low for all ethnicities and races at levels less than 40. The dissimilarity index levels in Clackamas County appear to have an upward trend. The dissimilarity between Non-white and White persons has almost doubled from 13.49 in 1990 to 26.23 in 2010. In the region the same index has only increased by 3 points from 28.76 in 1990 to 31.79 in 2010. The index between Black and white persons has moved from 29.56 in 1990, dropped to 25.5 in 2000 then back up to 35.35 in 2010. In the region the index has dropped from 63.52 in 1990 to 48.59 in 2010. The dissimilarity between Hispanics and whites has almost doubled between 18.82 in 1990 to 31.03 in 2010. In the region the Hispanic/white index has increased from 25.72 in 1990 to 37.13 in 2010. The Hispanic population has increased as a percentage of the County population to 7.73% and as a percentage of the region increased to 10.86%.

- c. **Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.**

2017 HUD data for this AFH analysis has not identified any HUD-defined RE/CAP areas in the Clackamas County jurisdiction. HUD Maps and Data indicate that Clackamas County has a low level of segregation compared to the region. Clackamas County Community Development Division has identified six (6) census tracts that have “High Concentrations” of poverty and ethnicity. Census tracts 212.00, 216.01, 216.02, 222.01, 229.04, 229.07 and 9800 are clustered in 4 populated areas including Oak Grove, North Clackamas, Canby and, the Hwy 212 and Hwy 205 intersection. The concentrations of ethnicity are Hispanic in all of the census tracts identified as having concentrations. Census tract 9800 is located in a national forest populated by less than 300 people. Clackamas County also identified an area of higher Asian concentration in Happy Valley but this area was not identified as a low income area.

- d. **Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.**

The 2017 HUD data revealed that segregation is low throughout Clackamas County. The six census tracts that were identified as having “High Concentrations” of poverty and ethnicity are clustered in 3 communities. The areas of concentrated poverty and ethnicity do contain areas that are zoned high density residential and contain large multifamily housing developments. The City of Canby although having two census tracts that are considered concentrations of low-income households and ethnicity also contains a census tract that is a high concentration of Hispanic ethnicity that is not identified as low income.

- e. **Discuss how patterns of segregation have changed over time (since 1990).**

Between 1990 and 2015 Clackamas County has experienced population growth of approximately 100,000 people. The Hispanic population has quadrupled from 7,000 to over 30,000 people. The North Clackamas County area neighboring on the City of Portland has consistently remained low income due to the numerous low-rent houses, apartments, trailer parks and older single family housing units along the 82nd Avenue/highway 213 corridor. This area is considered a concentrated area of poverty and ethnicity however many resources have been applied to the area and the area has employment options, transportation and services.

f. **Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.**

Urbanized areas contain land that is zoned high density residential (HDR) where multi-family housing projects can be built. The limited number of areas zoned as high density may further concentrate poverty however these areas are also considered high opportunity areas due to the proximity to employment options, public transit options, services and schools.

Increasing cost of housing in the Portland metropolitan area will continue to make it difficult for low-income persons to purchase homes in the jurisdiction and the region. Low-income persons may be limited to living in rental properties and limited to living in multi-family housing unless more areas of the county jurisdiction are re-zoned to allow for more high density residential units and other types of housing, including specialized housing, shared housing ownership options and smaller single family lot sizes.

Economic segregation may be occurring in the jurisdiction. The communities of Lake Oswego, West Linn and Happy Valley are regularly mentioned as the highest income communities in the state. The average value of owner-occupied homes when these communities are aggregated is \$415,567 while the average value of owner-occupied homes in the jurisdiction is \$297,983, a difference of over \$100,000. When the high income community data is removed, the average home value drops further to \$258,789.

The average household income in 2014 dollars was \$89,538 for these three communities combined while the average household income for the jurisdiction was \$20,000 less at \$68,005 per year. When the census income data from these high income communities is removed from the county data the average household income drops to \$60,827 almost \$30,000 less than the average income of the 3 high income communities combined. The jurisdiction's poverty rate also increases from 9.6% to 11% when the income data from the 3 high income communities is removed from the county data. The poverty rate in these 3 communities combined is 5.63% which about half the rate of the county poverty rate of 11% with these high income communities removed.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**

The State of Oregon and City of Portland has a history of segregation of African Americans (Blacks) and Japanese Americans. The City of Portland had segregated Blacks to North or Northeast Portland before 1960. During World War II (1940s) Japanese Americans were required to live in Federal Internment Camps in Oregon, Washington, Idaho and California. Many families lost their personal assets and were not able to quickly regain their assets after being released from Internment Camps.

The jurisdiction's Asian population is the most segregated based on 2010 census data with the Low Segregation rate of 39.65 (almost in the Moderate Segregation range of 40 to 54). It may be that the jurisdiction has a city that is attracting Asian home buyers. Census data examination of the City of Happy Valley has a total 2010 population estimate of 14,252 and a 2015 estimate of 18,493 people or a 29.8% increase. The Happy Valley median household income (in 2014 dollars), 2010-2014 is \$100,438 which is well above the jurisdiction's area median income of \$73,500.

In 2010 Happy Valley had a white population of 76.2%, an Asian population of 17.5% (2,494 people), a Hispanic or Latino population of 4% and, a population with 15.5% foreign born persons. If the 2010 Asian % is applied the 2015 population estimate of 18,243, number of Asian persons in Happy Valley is 3,236 which would represent 17.2% of all Asians in the jurisdiction living in this community.

Total jurisdiction 2010 Asian population was 14,485 (3.84% of total). The 17.2% rate of Asians living in Happy Valley which is almost 5 times the jurisdictional rate may explain the jurisdiction Asian segregation rate of 39.65.

Source: <https://www.census.gov/quickfacts/table/PST045215/4132050>

- b. **The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.**

The jurisdiction has no place based investments and mobility options for specific protected class groups other than for persons who live in public housing or have a Housing Choice Voucher who are trying to move. The jurisdiction does have the Clackamas County Development Agency that oversees 4 urban renewal areas in un-incorporated Clackamas County. The urban renewal area plans are designed to increase jobs, improve economic vitality and, improve opportunities for development and re-development. The 4 urban renewal areas are Government Camp, the Clackamas Industrial Area, the Clackamas Town Center Area and the

North Clackamas Renewal Area. The Clackamas Town Center Area and the North Clackamas Renewal Area are located either within or adjacent to areas that are identified as “High Concentrations” of ethnicity and low-mod income households.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Community Opposition
- **Displacement of residents due to economic pressures**
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Occupancy codes and restrictions
- **Private discrimination**
- Other

Segregation in Clackamas County remains low based on the 2017 census HUD provided tables and maps. The areas that have high concentrations of both low-income and ethnicity appear to be located where the cost of rental housing has remained lower (location and type of affordable housing). Affordable housing units are also located in areas that do not have concentrations of poverty or ethnicity. Each of the high concentration areas contains multi-family housing and mobile home parks. The North Clackamas Area has received a consistent public investment (community revitalization funds) in infrastructure and public facilities in an effort to improve this un-incorporated urban area. Low-income families live where they can afford to live. Based on discrimination complaint data, private discrimination continues to occur in the jurisdiction and the region.

Some economic segregation may be occurring as low-income persons are push out of high rent high income communities in the jurisdiction.

ii. R/ECAPs

1. Analysis

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.**

HUD data this AFH analysis has not identified any HUD-defined RE/CAP areas in the Clackamas County jurisdiction.

Clackamas County has 218 Census Tract Block Groups. Of those 218 block groups, ten percent (10%) or 22 block groups have a population that is more than 56% low and moderate income (LMI).

According to the Census Bureau 7.7% of Clackamas County residents identified their ethnicity as Hispanic or Latino in the 2010 census.

2010 Census data on ethnicity of County residents indicates that of the more populated cities, Canby and Molalla had the highest percentages of Hispanic/Latino residents (21% and 14% respectively). Among the cities with populations above 10,000 people, Canby, Happy Valley and Wilsonville had greater than 20% minority populations.

Clackamas County Housing and Community Development Division reviewed both race and ethnic information from the 2010 Census Bureau to determine minority ranking. The 22 block groups with the highest minority ranking represent 10 percent of all the block groups in Clackamas County.

Nine (9) block groups rank in the top 22 for both minority and LMI, and represent the block groups with the highest concentrations (HC) of poverty and minorities. Five (5) of the high LMI concentration (HC) block groups are located in the North Clackamas Area along HWY 205. One (1) of the HC block groups is in Milwaukie and two (2) of the HC block groups are in Canby. A total of 13, 855 people live in these areas of High Concentrations (HC) of minority and low income persons.

b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

Data in 2017 revealed that in the Portland Metro region, 10,587 households lived in RE/CAP areas. Regional data revealed that Hispanic households were 53.64% of all households in regional RE/CAP areas, white-non-Hispanic households were 34.83%, Asian or Pacific Islander households were 4.36%, Black households were 3.69% and Native American and Other, Non-Hispanic households were less than 1%. In comparison with the jurisdiction of Clackamas County “High Concentration” areas, 70.30% were white, non-Hispanic households, 21.40% were Hispanic households and all others were less than 3% of the total “High Concentrations” households.

Mexico was the #1 country of origin for 26% of families living in regional R/ECAPS, 2.45% were from Guatemala, 1.89% were from the Ukraine, 1.1% from Laos and all other countries of origin being less than 1% per country.

c. Describe how R/ECAPs have changed over time (since 1990).

Clackamas County has no HUD identified R/ECAP areas. One of the regional R/ECAP areas is located within the city boundaries of Portland in the North Portland area, an area that has been a historically Black neighborhood although the current R/ECAP data has only 3.69% Black or 391 people living in R/ECAP areas. The R/ECAP areas in Portland have remained mostly occupied by Black families. The second R/ECAP area is located south of Main Street in the City of Hillsboro and contains a concentration of Hispanic persons. A 2017 HUD Table (4) with R/ECAP demographics indicates that 5,679 persons of Hispanic ethnicity representing 53% of all persons live in the R/ECAPs. HUD Maps 1, 2, 3 for 1990 and 2000 demonstrate that regional R/ECAPs in the region have disappeared in North Portland and moved to NE Portland within the City of Portland however in the City of Hillsboro which had no R/ECAP areas until 2010. The City of Beaverton has experienced a dramatic population growth in the last 20 years. The Clackamas County jurisdiction has had no HUD identified R/ECAPs in the past and has no R/ECAPs based on current HUD data.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.**

The jurisdiction of Clackamas County has no HUD identified R/ECAP areas.

The regional cities of Hillsboro and Portland contain R/ECAP areas. R/ECAP areas in Portland have moved east within city limits in the last 20 years but have remained mostly occupied by African American/Black families. Hillsboro had no R/ECAP areas until 2010 but now has a R/ECAP area populated mostly by Hispanic families. 2017 HUD data (Table 4) detailed that a total population of 10,587 people reside in the RE/CAP areas. 53.6% of the total population or 5,679 people are Hispanic and 3,687 people or 34.83% of the regional R/ECAP population is white, non-Hispanic. 4.36% of the total population is Asian or Pacific Islander and 3.69% of the RE/CAP population is Black, non-Hispanic.

- b. **The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.**

Clackamas County has no HUD identified R/ECAP areas. The jurisdiction of Clackamas County has been investing in areas identified as having High Concentrations of ethnicity and low-income persons particularly in the North Clackamas Area since 1980.

The Clackamas Town Center Area was formed in 1980 contains one area considered a high concentration of low-income households and ethnicity (Hispanic). The Clackamas Town Center area is the region's fastest growing business center. In the last 30 years many high quality office, retail and multifamily projects have been built. Long-term success depends on achieving a balance of access and amenities that attract residents, businesses and future development. The biggest challenges have been funding transportation projects and providing enough parks, open space and public places.

A group of local business leaders, government officials and community members, the Clackamas Regional Center Working Group, was asked by the Board of County Commissioners to evaluate potential projects in the district and recommend which projects to implement. The Working Group developed a work program that prioritized projects and presented it to the Commission for consideration including several transportation infrastructure projects to improve economic development and employment opportunities for area residents.

The North Clackamas Renewal Area (NCRA) formed in 2006 has established neighborhoods that are among the more affordable places to live in the County, but there are long-term infrastructure problems that need to be resolved. The current NCRA plan includes projects in a number of areas to improve the livability of the area, including:

- public utilities
- public parks and open spaces
- public buildings and facilities
- street, curb and sidewalk improvements
- streetscape and neighborhood beautification
- preservation and rehabilitation of housing and commercial property
- development and redevelopment of housing and commercial property

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Community Opposition
- Deteriorated and abandoned properties
- **Displacement of residents due to economic pressures**
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation

- **Land use and zoning laws**
- Location and type of affordable housing
- Occupancy codes and restrictions
- **Private discrimination**
- Other

Clackamas County has no HUD identified R/ECAP areas. Regionally, gentrification, land use and zoning laws and private discrimination continue to put pressure on protected classes and vulnerable populations’ ability to choose housing that is affordable and in high opportunity areas. Gentrification caused by the high demand for housing in the region and in the jurisdiction is causing displacement of low-income persons including protected classes of residents due to economic pressures. Land use and zoning laws prevent multi-family affordable housing units from being built in many areas where communities have been traditionally single family homes.

The region has a new R/ECAP area in 2010 in the City of Hillsboro which has grown dramatically in 20 years. The Hillsboro R/ECAP areas has a large Hispanic population. R/ECAP areas in north Portland have been populated by African American/Black families however these areas have now gentrified resulting in a new R/ECAP area in Northeast Portland which is also populated by a majority of Black families. As the largest city in our region, the City of Portland’s 2012 Fair Housing plan will have an impact on the housing market in the region and in the jurisdiction.

iii. Disparities in Access to Opportunity – No changes/new data since 2017

1. Analysis

a. Educational Opportunities

i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

Clackamas County contains ten (10) school districts. Although Clackamas County is considered an “urban” county there are five (5) large rural area school districts including Molalla River School District (SD), Colton SD, Canby SD, Estacada SD and the Oregon Trail SD. The five school districts in “urban” areas are Gladstone SD, Lake Oswego SD, West Linn SD, North Clackamas SD and Oregon City SD. The cities of West Linn and Lake Oswego are considered to be the wealthiest communities in Oregon with well-funded school programs. 2017 HUD Map 9 data indicated that schools on West Linn and Lake Oswego west of the Willamette River have higher school proficiency indices than schools east of the Willamette River. The City of Happy Valley is also considered a high-income community however Happy Valley is served by the North Clackamas School District which contains two areas that are “High Concentrations” of Hispanic ethnicity and low-income populations.

School proficiency measurements are based on test scores of 4th grade students. A review of HUD 2017 Table 12 revealed that the Clackamas County total population school

proficiency index has all races above 55 with a high of 68.03 for Asian or Pacific Islanders and the Hispanic index at 55.62. Regionally the highest proficiency indicator is 52.61 for Asian or Pacific Islanders with a low of 36.19 for the Black population and the Hispanic index at 40.13. All races have higher proficiency in Clackamas County than in the region.

For the population living below the poverty line all races have higher proficiency in Clackamas than the region. The lowest school proficiency index is 48.08 for the Black population in Clackamas County which is above the index regionally for the Black population below the poverty line at 32.04. The Hispanic population proficiency is 56.42 in Clackamas County and 36.30 in the region.

- ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.**

As indicated by the higher proficiency by all races in Clackamas County than all races in the region, all races including those living below the federal poverty line have access to proficient schools. The 2017 HUD Map 9 also showed that all races in Clackamas County lived in close proximity to proficient schools.

- iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?**

As stated above, all races in Clackamas County above and below the poverty line have higher performance indices than all races regionally. Although a survey of school-related policies was not conducted for this analysis, based on Table 12 measurements the Black population below the federal poverty line scores lowest in school proficiency at 48.08, Native Americans are the next lowest scoring race at 53.39. The Black population which is less than 1% of the total jurisdiction population scores 62.08 which is better than the Hispanic population scoring 55.62. Based on the Table 12 School Proficiency Index scores, it appears that all protected classes are able to access proficient schools in the jurisdiction.

b. Employment Opportunities—No changes/new data since 2017

- i. Describe any disparities in access to jobs and labor markets by protected class groups.**

The Labor Market Engagement Index provides a measure of the unemployment rate, labor force participation rate and the percent of the population age 25 and above with at least a bachelor's degree, by neighborhood. The Labor Market Index in 2017 HUD Table 12 for the total population demonstrates slightly better labor market engagement in the jurisdiction than in the region for all protected classes but not for white households. Black households have a jurisdictional index of 55.73 while in the region the index is 54.33. Hispanic households have a jurisdictional index of 49.99 while the regional index

is 47.74. Asian or Pacific Islander households have a jurisdictional index of 66.21 and a regional index of 61.12. Native American, non-Hispanic households have a jurisdictional index of 50.62 and a regional index of 48.94. White, non-Hispanic households have a jurisdictional Labor Market Index of 55.61 and a regional index of 57.05.

For households below the poverty line, protected class households also all have a higher Labor Market Index in the jurisdiction than in the region by 3 to 7 points. White households below the poverty line score almost equally between the jurisdictional index of 50.63 and the regional index of 50.65.

The Jobs Proximity Index in 2017 HUD Table 12 for the total population demonstrates slightly better proximity to jobs in the jurisdiction than in the region for all protected classes and white households. Black households have a jurisdictional index of 55.81 while in the region the index is 51.50. Hispanic households have a jurisdictional index of 55.44 while the regional index is 51.38. Asian or Pacific Islander households have a jurisdictional index of 48.99 and a regional index of 45.61. Native American, non-Hispanic households have a jurisdictional index of 50.93 and a regional index of 50.21. White, non-Hispanic households have a jurisdictional Jobs Proximity Index of 48.74 and a regional index of 47.93.

The Job Proximity Index for households below the poverty line white, non-Hispanic and Native American, Non-Hispanic households have a lower index in the jurisdiction than in the region. The protected classes of Black, Hispanic and Asian households have higher jurisdictional indices.

ii. How does a person's place of residence affect their ability to obtain a job?

Distance from a potential employer can limit options for persons applying for jobs. Reliable transportation in the form of a personal vehicle or reliable public transit options often is a determining factor as to whether a person will apply for a job at all. Travel time to work using a personal vehicle or public transportation requires time and money. For low income families less time and money directly impacts the quality of life for all family members.

iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

The 2017 HUD Table 12 Jobs Proximity Index jurisdictional scores revealed that in the total population, white, non-Hispanic persons have the lowest job proximity index of 48.74. Asian or Pacific Islander persons have the next lowest index of 48.99. Regionally, the job proximity index for white, non-Hispanic persons is lower at 47.93 and for Asian Pacific Islander persons the index is 45.61. Based on the Table 12 Jobs Proximity Index scores, it appears that all protected classes are able to access jobs at a higher rate in the jurisdiction than in the region, except for Asian or Pacific Islanders who score 48.99 in the jurisdiction but only 45.61 in the region. Interestingly, Asian or Pacific Islanders living below the federal poverty line have greater proximity to jobs regionally at 54.09 than the same class in the region at only 46.53. The opposite appears to be true for the Native American, non-Hispanic below poverty population that scores 52.10 on a

regional basis but only 48.73 in the jurisdiction. It appears that the Native American population living below the poverty level score about the same as white, non-Hispanic in the total population of the jurisdiction at 48.74.

c. Transportation Opportunities—No changes/new data since 2017

i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

The Low Transportation Cost Index in the 2017 HUD Table 12 measured cost of transport and proximity to public transportation by neighborhood. The higher the index the lower the cost. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The higher the index the more likely residents of a neighborhood will access public transportation.

In Clackamas County urban areas, Metro oversees the regional transportation systems including: the public bus services, light rail lines, street cars and the Port of Portland airport and ship yards. Clackamas County's rural areas have limited transportation services due to the lower population in general. A majority of the population lives in urban areas and a minority of the population lives in more rural areas.

A review of the Clackamas County jurisdiction Table 12 Low Transportation Cost Index for the total population indicates that white, non-Hispanic households have the lowest index (highest cost) at 46.26. Of the population below the poverty line, white, non-Hispanic households have the highest transportation costs and the lowest index of 49.88. Native American, non-Hispanic households have the next lowest index (highest cost) at 47.01. Maps 12 and 13 confirm that households that are closer to urban areas and the associated transit options have lower transportation costs.

The Transit Index tells a slightly different story. The Native American, non-Hispanic households have the lowest transit index (less likely to use) at 67.55, white households at 68.07, Hispanic households at 72.38, Asians or Pacific Islander households at 72.49 and, Black, non-Hispanic households at (most likely to use) 74.04. It appears that whites are least likely to use public transit and Black households are most likely to use public transit in the jurisdiction.

The population below the poverty line in the jurisdiction, maintains the pattern of whites least likely to use transit having the lowest score at 69.83, however Hispanic households are most likely to use transit. The second group least likely to use transit are Black, non-Hispanic households at 71.03, then Native American households at 71.19 and Asian or Pacific Islander households at 74.16.

In the region, the population below poverty the group least likely to use transit continues to be the white, non-Hispanic households at 78.41. The second least likely to use transit are Hispanic households at 81.92, third, Asian or Pacific Islander households at a score of 82.37, fourth least likely are Native America, non-Hispanic households. Black, non-Hispanic households are most likely to use transit with a score of 85.01.

ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

White, non-Hispanic households have the lowest Low Transportation Cost index (highest cost) at 46.26 which is lower in the jurisdiction than the regional index of 53.63 for white households. Native American, non-Hispanic households have the next lowest index (highest cost) at 47.01 with a regional measure of 54.56. The population of Asian or Pacific Islanders are at 50.19 in the jurisdiction and 58.51 regionally. Hispanic households are at 51.04 in the jurisdiction and 58.43 in the region. Black non-Hispanic households have the highest index (lowest cost) with a 54.44 index, having lowest cost transportation in both the jurisdiction and in the region at 64.05.

For population below the poverty line, white, non-Hispanic have the lowest score (highest cost) at 49.88 in the jurisdiction and 59.18 in the region. The next lowest index (highest cost) is the Black, non-Hispanic population at 53.10 in the jurisdiction and 67.10 in the region. The Asian or Pacific Islanders population has a higher transportation cost in the jurisdiction than in the region with an index of 54.28 in the jurisdiction and 62.68 in the region. Hispanic households below poverty have the lowest cost (highest index) with a 56.79 in the jurisdiction and 61.67 in the region.

The combination of Transit Index and Low Transportation Cost Index indicates that white, Non-Hispanic and Native American, non-Hispanic households have the lowest scores and would be most impacted by a lack of a reliable, affordable transportation connection between their place of residence and opportunities in both the jurisdiction and the region.

For the population below poverty, Black, non-Hispanic and white, non-Hispanic households in the jurisdiction have the lowest scores and would be most impacted by a lack of a reliable, affordable transportation connection between their place of residence and opportunities. In the region, white, non-Hispanic and Hispanic households score lowest and would be most impacted by a lack of transportation options.

iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

The Jurisdiction does well in urbanized areas since Metro (a regional planning body) plans transportation services for the Oregon side of the region (the region contains 2 counties in Washington state). Six transits systems operate within the jurisdiction. Two rural communities in the jurisdiction (City of Sandy and City of Canby) operate their own small bus services to connect residents to the larger transportation services. The Clackamas County Transportation Consortium includes 9 senior centers plus the Transportation Reaching People program. The jurisdiction also has a Medicaid medical

transportation program as well as private providers: taxis, medical transportation contractors and, transportation services offered by facilities.

The jurisdiction's Clackamas County Social Services Division operates several transportation programs, and, through a partnership called the Clackamas County Transportation Consortium, provides coordination and funding for transportation needs at the ten senior and community centers operating in Clackamas County.

1. The Transportation Reaching People (TRP) Program serves Clackamas County seniors and people with disabilities who need transportation to medical appointments, personal business, and shopping. Door to door transportation is provided by volunteer drivers using their private auto. TRP staff drive wheelchair accessible vans. The goal of the program is to assist individuals by promoting independent living and preventing unnecessary institutionalization.

2. The Ride Together program empowers riders to recruit their own volunteer drivers (i.e. family, neighbors, and friends) and, as an incentive, the drivers are reimbursed for their mileage costs. This program allows customers to schedule their rides directly with their drivers at times that work for both parties.

3. The Catch-A-Ride (CAR) Program serves Clackamas County residents referred by partner agencies who need transportation to employment related services, school, and workshops. The goal of the program is to assist individuals by promoting self-sufficiency and reduce the need for public assistance.

4. The Travel Trainer (TT) Program teaches Clackamas County residents on how to use public transportation. The main goal of the program is to empower residents to use public transit to gain and retain their employment.

d. Low Poverty Exposure Opportunities—No changes/new data since 2017

i. Describe any disparities in exposure to poverty by protected class groups.

The Low Poverty Index in 2017 HUD Table 12 used rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. In the Clackamas County jurisdiction, Hispanic households have the most exposure to poverty based on the lowest index score of 55.29, followed by Native American, non-Hispanic households with a score of 59.63. The next protected class with the 3rd highest exposure to poverty is the Black, non-Hispanic class with a score of 60.97. White, non-Hispanic households have the 4th highest exposure to poverty with a score of 64.60. Asian or Pacific Islander households have the least exposure to poverty in the jurisdiction with a score of 70.65. The same order of highest to lowest is maintained for the population living below poverty in the jurisdiction: Native American, non-Hispanic (40.51), Hispanic (44.08), Black (54.78), White (57.09) and Asian or Pacific Islander (63.98) populations with the least exposure to poverty.

ii. What role does a person’s place of residence play in their exposure to poverty?

2017 HUD Map 14 was limited in demonstrating the role of residency in exposure to poverty. Large rural tracks of land in Clackamas County that were darker on the map indicated that people living in rural areas were more exposed to poverty. However, areas that have been identified as having “High Concentrations” of ethnicity and poverty were located in urbanized areas with large housing developments, apartments and manufactured housing/trailer parks. Clackamas County contains no R/ECAPs areas.

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

In the region, Black, non-Hispanic households have the most exposure to poverty reflected in the lowest total population index of 41.25 followed by Hispanic households with 43.14. For the population below poverty, Native American, non-Hispanic households have the most exposure to poverty with a score of 32.63 followed by Black households with an index score of 33.43. The white, non-Hispanic population and the Asian or Pacific Islander, non-Hispanic have the least exposure to poverty with scores of 56.42 and 56.13 respectively. The white, non-Hispanic and Asian populations below the poverty also have the least exposure to poverty with index scores of 45.52 and 43.73, respectively.

In the Clackamas County jurisdiction, Hispanic households have the most exposure to poverty based on the lowest index score of 55.29, followed by Native American, non-Hispanic households with a score of 59.63. The next protected class with the 3rd highest exposure to poverty is the Black, non-Hispanic class with a score of 60.97. White, non-Hispanic households have the 4th highest exposure to poverty with a score of 64.60. Asian or Pacific Islander households have the least exposure to poverty in the jurisdiction with a score of 70.65.

iv. Describe how the jurisdiction’s and region’s policies affect the ability of protected class groups to access low poverty areas.

Clackamas County has identified areas with “high concentrations” of Hispanic ethnicity and low moderate income. The jurisdiction has also compiled opportunity maps that indicate that the areas of high concentration are located within or next to areas of opportunity. There are some local areas that do not support the building of multi-family housing developments or affordable housing developments. The lack of availability of affordable and accessible housing units in these communities may affect the ability of protected class groups to access low poverty areas. However, other protected groups with high incomes are able to buy into these communities of most expensive homes.

e. Environmentally Healthy Neighborhood Opportunities—No changes since 2017

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

The environmental health index listed in the 2017 HUD Table 12 indicated the health of a neighborhood based on exposure to air pollution. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. The 2017 HUD Map 15 showed residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction and the region. The higher the Environmental Health Index indicates a better environmental health level or less exposure to toxins harmful to human health.

Clackamas County populations may have more exposure to air pollution the closer they are to urban areas and highways. Most of the population, industry and highways are in the northwest corner of the jurisdiction/county.

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

In the Clackamas County jurisdiction, Asian or Pacific Islander populations have the lowest index at 9.69 followed by Black, non-Hispanic households at 9.99, however the same protected classes that live below the poverty line have better access to health environments at 11.16 and 19.26 respectively. Native American, non-Hispanic households have the best level of environmental health at 19.39 in the jurisdiction followed by white, non-Hispanic households at 17.82 and Hispanic households at 16.89.

All protected class households and white, non-Hispanic households in the jurisdiction have higher (better) environmental Health indices than the same classes in the region.

f. Patterns in Disparities in Access to Opportunity—No changes since 2017

i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

The jurisdiction has no identifiable overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. The jurisdiction has no readily identifiable areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. The jurisdiction has no HUD identified R/ECAPs and no protected classes that are either Moderately Segregated or Highly Segregated. Areas that are identified as having “high concentrations” of ethnicity

and concentrations of low to moderate income households are located either within or in close proximity to areas of high opportunity including transportation services, jobs and proficient schools.

All protected class households and white, non-Hispanic households in the jurisdiction have higher (better) environmental Health indices than the same classes in the region.

2. Additional Information– No changes since 2017

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.**

Regionally, the Healthy Columbia Willamette Collaborative is a public/private partnership that includes 15 hospitals, four health departments (Clackamas, Multnomah, and Washington counties of Oregon, and Clark County, Washington), and a regional coordinated care organization (CCO - managed Medicaid organizations). It was established in 2012 to align the efforts of participating organizations and produce a regional community health needs assessment every three years. The findings from the 2013, 2016 and 2019 assessments highlight the health disparities and inequities in our region, identify gaps in our services and demonstrate the factors that make our residents and communities healthy. Member organizations use the regional community health assessment data to guide their decision-making as it relates to policy, budgets, and long-term planning. Along partners, Clackamas County will assure the implementation of the Blueprint for a Healthy Clackamas.

Representatives from Health, Housing, and Human Services, the Public Health Advisory Committee, and the Healthy Columbia Willamette Collaborative serve on Blueprint subcommittees and provide subject matter expertise to help partners achieve the goals and objectives outlined in the plan.

Website: <https://www.blueprintclackamas.com/>

- b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

The Clackamas County jurisdiction has identified “Transportation Disadvantaged Populations” in the process of developing a Transportation System Plan Update 2035. Transportation Disadvantaged Populations are defined as “groups of people who have historically had unmet transportation needs or have experienced disproportionate negative impacts from the transportation system such as the elderly, youth, low

income, and low vehicle ownership populations, and those living within 500 feet of a freeway or highway.”

Each of the High Concentration of ethnicity and low-income areas identified by the jurisdiction are included as areas that contain “Transportation Disadvantaged Populations” that will be considered in future county jurisdiction transportation planning and projects.

3. Contributing Factors of Disparities in Access to Opportunity– No changes since 2017

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- **Lack of regional cooperation**
- **Land use and zoning laws**
- Lending Discrimination
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

The only Contributing Factors of Disparities in Access to Opportunity for protected classes may be the general lack of affordable housing for low income households in the jurisdiction and in the region. The Lack of Regional Cooperation on affordable housing and the Land Use Zoning laws may be the contributing factor to the lack of affordable housing options thereby limiting access to opportunity. The rapid increase in housing demand in the private housing market will continue to gentrify some low income neighborhoods and push low-income families further from high opportunity areas.

A recent regional Metro Housing Equity 2016 Report detailed the lack of affordable housing units referenced as “missing middle” housing units. “There are currently approximately 30,000 income-restricted units of housing regulated to remain affordable to households making less than 60 percent of median income, and approximately 73,000 units of market-rate housing that are affordable at this level

(although rising rents will cause this number to diminish) in the four-county metro region. With over 185,000 households making less than 60 percent of median income, that leaves a shortage of more than 80,000 units of affordable housing.” *Metro Opportunities and challenges for equitable housing, January 2016* website: oregonmetro.gov/equitablehousing.

<https://regionalbarometer.oregonmetro.gov/pages/communities-housing>

iv. Disproportionate Housing Needs–

1. Analysis

- a. **Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?**

The Coronavirus pandemic has impacted many vulnerable populations economically. Loss of wages, illness and unstable housing has forced many to apply for rent assistance from state, federal and county resources.

An initial review of 2017 HUD Table 9 data when compared to similar data for neighboring jurisdictions of similar size and composition indicated that data for the Clackamas County jurisdiction was inaccurate or extremely low. HUD has since provided a revised HUD Table 9.

In the jurisdiction, 56.02% of Hispanic households are experiencing any of the 4 housing problems at the highest rate by racial/ethnic group, the second highest rate is for Native American, Non-Hispanics with a 53.49% rate and the third highest rate is for Black, Non-Hispanic households at 49.16% which is actually 410 of all 834 Black households in the jurisdiction. The Asian or Pacific Islander group has a 43.65% rate of housing problems. The rate for Other, Non-Hispanic households is 39.78% and the rate for all households experiencing housing problems for the jurisdiction is 39.02% or 57,230 of the total 146,665 households. The white, non-Hispanic group has the lowest rate 37.82% representing 49,570 households from a total of 131,065.

Severe Housing Problems in the jurisdiction follows a similar pattern of being highest among the Hispanic households at 34.03% of 6,890 households, then Native American, non-Hispanic households at 28.23% of 673 households and Black, Non-Hispanic at 25.78% of 834 total Black households in the jurisdiction.

Disproportionate Housing needs in the jurisdiction by household type and size are highest for family households with children (5+ people) at 51.28% or 7,020 of a total of 13,689 total households in this category. The second highest rate is for non-family

households at 46.76%. Family households with less than 5 people had the lowest rate of 33.13% of households experiencing housing problems from a total of 87,884 households in this category.

In the region, the group with the highest rate of housing problems is the Hispanic group with 58.75%, the second highest group is the Black, non-Hispanic group with 55.34% reporting housing problems or 12,342 of 22,301 total Black households in the region. The third highest rate of housing problems is the Native American, non-Hispanic households group with a rate of 46.24% or 2,271 of a total 4,911 total Native households. The rate for all 864,545 households in the region is 39.89% with housing problems and 19.66% with severe housing problems.

Severe Housing problems for the region effect the same 3 groups with the highest severe housing problems rate of 36.32% for Hispanic households, 34.05% for Black, non-Hispanic households and 24.13% of Native American, Non-Hispanic households reporting severe housing problems.

Disproportionate Housing needs in the region by household type and size are similar to the jurisdiction in that the need is highest for family households with children (5+ people) at 54.02% or 41,790 of a total of 77,100 total households in this category. The second highest rate is for non-family households at 46.75%. Family households with less than 5 people had the lowest rate of 33.03% of households experiencing housing problems from a total of 473,864 households in this category.

- b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?**

2017 HUD Maps 7 and 8 for the jurisdiction revealed that the region is mostly populated by white households. As state earlier, a majority of the jurisdiction's population resides in the northwestern corner of the county which is shaded mostly light (less housing burden) on Maps 7 and 8. The darkest areas representing those areas with the highest housing burden are located on the eastern side of the county which include a national park and national forest land that is sparsely populated. The five most predominant races with housing burdens by national origin are persons from Mexico, China, Canada, Vietnam and Ukraine. According to HUD Table 1, persons from Mexico are 2.57% of the jurisdiction's population, China 0.48%, Canada 0.42%, Vietnam 0.40% and Ukraine 0.38% of the jurisdiction.

- c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.**

HUD 2017 Table 9 indicated that 33.13% of family households in the jurisdiction with housing problems have less than 5 people and 46.76% of households are non-family households. In the region, 33.03% of family households with housing problems have less than 5 people, 54.20% have more than 5 people and 46.75% of households with problems have no children (non-family households).

Publicly Supported Housing Table 11 indicates that in Public Housing units, 41.73% of households have children. Of all public housing units, 29.70% of the units are 2 bedroom and 35.53% of the units are 3 or more bedrooms in size.

HUD 2017 Table 11 also showed that Project-based Section 8 units are 31.36% occupied by households with children. Section 8 units are comprised of 34.46% 2 bedroom units and 8.19% 3 or more bedroom units.

The Other multi-family units listed in Table 11 show that less than 1% of households have children and all units are 0-1 bedrooms.

HUD 2017 Table 11 also showed that of all the HCV program participating households, 39.07% have children. HCV households rent family size units at a rate of 27.07% for units of 3 or more bedrooms and 44.27% of households rent 2 bedroom units.

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

The jurisdiction has no current data on the rates of renter and owner occupied housing by race/ethnicity. The U.S. Census Bureau Quickfacts website has an Owner occupied (2010-2014) housing unit rate of 68.5% for Clackamas County. The remainder of the households 31.5% ($100\% - 68.5 = 31.5\%$) could be considered renter occupied households unless those households are living in institutions or elsewhere. According to HUD Table 5 there were a total of 157,887 housing units in the jurisdiction in 2010. 31.5% of the 157,887 housing units equals 49,734 housing units occupied by renters.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

The State of Oregon Housing and Community Services (OHCS) published a housing needs Assessment in 2018 using various sources of data including American Community Survey data. The OHCS Housing Needs for Clackamas County identified that 44 housing units were needed for persons in need of drug and alcohol rehabilitation, 169 units were needed for persons who are chronically mentally ill, 85 units were needed for

persons who have a developmental disability, 78 units for persons who are physically disabled, 891 units were needed for elderly persons, 248 units were needed for frail elderly persons, 8 units were needed for persons with HIV/AIDS and, 143 units were needed for farm workers. Source: www.oregon.gov/OHCS/ISD/RA/housing-profiles/counties/Clackamas

- b. **The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.**

The PHA housing needs analysis is based on the Housing Authority of Clackamas County (HACC) public housing Waiting List data from the 2022 Annual Plan.

The Housing Authority last opened its wait lists in June of 2020. This opening focused on BIPOC outreach and advertised in mainstream as well as BIPOC media outlets. There was a specific outreach through email to identify partner agencies that worked directly with the BIPOC population. The results show that the Housing Authority did reach a more diverse population that is more reflective of the community as a whole and as indicated by census data. The Housing Authority estimates the average wait time is 3 or more years with current voucher and public housing resources. The longer wait time is primarily due to a larger focus and preference to serve the homeless and disabled in the past two years while the Metro Region is experiencing a homeless crisis.

1,401 Households requested Housing Choice Vouchers and Public Housing. 85% of households (1184 households) were extremely low income households with incomes of less than 30% of the Area Median Income. 34% of households on the wait list had a disabled family member. 37% of households on the wait list (522 households) were requesting a one-bedroom unit, 35% requested a two-bedroom unit, 344 households or 25% requested a three bedroom unit and, only 2% requested a unit with at least 4 bedrooms.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- **The availability of affordable units in a range of sizes**
- **Displacement of residents due to economic pressures**
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending Discrimination
- Other

The only Contributing Factors of Disparities in Access to Opportunity for protected classes may be the general lack of affordable housing for low income households in the jurisdiction and in the region. The Lack of Regional Cooperation on affordable housing and the Land Use Zoning laws may be the contributing factor to the lack of affordable housing options thereby limiting access to opportunity. The rapid increasing in housing demand in the private housing market will continue to gentrify some low income neighborhoods and push low-income families further from high opportunity areas.

A local housing tax measure by the Metro Council required that Clackamas County engage with community members to produce a Local Implementation Plan (LIP):

LIP METRO Report page 14:

Overall, the analysis provided an empirical representation of the reality that Communities of Color are overrepresented in the homeless population, face significant barriers to accessing resources, and may experience worse outcomes in homeless and housing programs than non- Hispanic white households.

The racial disparity analysis below uses American Community Survey census data and Homeless Management Information System (HMIS) data to highlight “over-” or “under-” representation by race/ethnicity for both Populations A (n = 621) and B (n = 1,817) (here “n” means the total number of individuals in each of these categories from which the subsequent statistical findings were drawn).

The Clackamas County data show the percentages of each race in the general population, and the percentage of the population served in priority populations A and B. If the percentage of people by race in the homeless system was the same as their percentage in the overall County population, there would be no green bars on the graph. If the percentage of a population by race was found to be higher or lower in the homeless system data than in the general population, that is represented in the graph as green bars (light green for Population A, dark green for Population B) showing the percentage difference. For example, people who identify as Black/African American make up 1.2% of the population of Clackamas County but make up 4.7% of Population A in the homeless system data. This overrepresentation is expressed in the graph by the percentage difference between the two numbers (a 119% difference in this case), shown in the light green bar.The most significant overrepresentations for both service populations are in the populations of: Native Hawaiian, Pacific Islander (163% for Population A and 133% for Population B); Black, African American (119% for Population A and 137% for Population B); and Native American, American Indian, Alaska Native (37% for Population A and 151% for Population B). The most significant underrepresentation for both service populations was found among Asian community members.

..... there may be fewer Latino/a/x and immigrant households accessing services due to both real and perceived barriers, including the Public Charge rule, which states, “an alien who is likely at any time to become a public charge is generally inadmissible to the United States and ineligible to become a lawful permanent resident. Under the final rule, a public charge is defined as an alien who has received one or more public benefits, as defined in the rule, for more than 12 months within any 36-month period.”

The need to seek public benefits and the harmful affect that assistance might have on immigration status may be the cause of reluctance and mistrust of the current system, even for households who are eligible for services, which could partially explain the underrepresentation of Latino/a/x populations in this data. In addition, the significant underrepresentation of Asian populations in both of the service population categories seems to indicate that Asian community members experience homelessness at far lower rates than people of other races and ethnicities do. However, this may also indicate insufficient or ineffective outreach by the homeless services system to Asian communities, as well as mistrust and barriers within Asian immigrant and refugee communities due to the Public Charge rule.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

- i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?**

A review of public housing residents and Housing Choice Voucher household 2022 data indicated that the Black population residing in Public Housing (8%) and using the Housing Choice Voucher (7%) program at more than 7 times the Black percentage of the general population (1.1%). The Black population appears to be over represented in Public Housing and in the HCV programs and Project Based Section 8 program (5%).

The Hispanic population in Public Housing (9%), Project-Based Section 8 (6%) and the HCV program (8%) is at least 1% below the current Hispanic population in the jurisdiction (9.6%). The Hispanic population appears to be slightly under-represented in Publicly Supported Housing however this may be due to the rapid growth of this population from 7.73% in 2010 to 9.6% in 2020.

The Asian population in Clackamas County was 4.9% of the general population. Public Housing units are occupied by 2% Asians, Project-Based Section 8 have 1% and Other Multifamily and HCV program were less than 1% Asian. This data reflects that the Asian population is underrepresented in Publicly Supported Housing.

- ii. **Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.**

As stated above, the Black population appears to be over represented in Public Housing, the HCV programs and in the Project Based Section 8 program.

The Hispanic population appears to be over-represented in the very low income category as 19.23% of the 0-30% of AMI category compared to 7.73 % of the general population. This over-representation may be due to the recent PHA requirements to offer any new PHA vouchers to extremely low-income persons.

The Asian population has no representation in the 0-30% AMI eligibility category, 3.28% in the 0-50% AMI eligibility category and 4.76% in the 080% AMI eligibility category. Since the Census data indicated that 3.84% of the jurisdiction is Asian, it appears that Asians are over represented in the 0-80% AMI eligibility category.

b. Publicly Supported Housing Location and Occupancy

- i. **Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.**

Clackamas County has no HUD identified R/ECAP areas and low segregation. Areas that have been identified as High Concentrations of ethnicity and poverty also include both private market and publicly supported multi-family housing units. There are no discernable patterns between segregated areas, R/ECAP areas or areas of High Concentrations of ethnicity/poverty and the location of publically supported housing.

- ii. **Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?**

Clackamas County has no HUD identified R/ECAP areas and low segregation. The 2017 AFFH maps HUD data indicated that publicly supported housing in all categories was distributed throughout the populated areas of the county jurisdiction and the region. The communities of Lake Oswego, West Linn and Happy Valley have been difficult for public housing residents to move to build affordable housing units in

due to some community opposition to affordable housing. Another factor affecting the difficulty of moving to these communities has been the higher rent levels than other areas according to some the Public Housing residents, Section 8 voucher holders and affordable housing developers. However, Section 8 Housing Choice Voucher are currently renting units in these communities.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS?

No data on R/ECAP areas since no R/ECAPS have been identified in Clackamas County.

The data on Non R/ECAP area Demographics indicates that all the data is equal to the data of the publically supported housing since no areas of the jurisdiction are R/ECAP.

A tally of the 2017 demographic data on the four (4) locally identified areas of High Concentrations indicated that High Concentration areas are over-represented by the Hispanic population with 21.40% Hispanic, 70.3% White, 1.6% Black, 3% Asian and 3% Other non-white. These areas were identified as high concentrations (more than 20%) due to the over-representation of the Hispanic population which is only 8% of the general population in the jurisdiction.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

A review of Public Housing Race/Ethnicity data in 2022 indicated that there are some minor differences among the composition of protected class households in public housing units. The population in publicly supported housing units continues to turnover due to people moving and new people moving in. The Housing Authority last opened its wait lists in June of 2020 with a focus on BIPOC outreach and advertising in mainstream as well as BIPOC media outlets. Specific outreach through email was used to identify partner agencies that worked directly with the BIPOC population. The results show that the Housing Authority did reach a more diverse population that is more reflective of the community as a whole and as indicated by census data. The Housing Authority estimates the average wait time is 3 or more years with current voucher and public housing resources. The longer wait time is primarily due to a larger focus and preference to serve the homeless and disabled in the past two years while the Metro Region is experiencing a homeless crisis.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

No additional relevant data.

- v. **Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.**

Clackamas County has 1,869 households with housing vouchers. Public Housing units are located in the Oregon City and in the City of Milwaukie and Housing Choice Voucher participants are located throughout the county. The race and ethnicity percentages for Housing Choice Vouchers match with the race/ethnicity percentages in the county. 31% of the voucher households (577) have children.

c. Disparities in Access to Opportunity

- i. **Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.**

Publically supported housing is located throughout the jurisdiction. As state earlier, the jurisdiction has no readily identifiable areas that experience poor access to opportunity and high exposure to adverse factors. The jurisdiction has no HUD identified R/ECAPs and no protected classes that are either Moderately Segregated or Highly Segregated. Areas that are identified as having “high concentrations” of ethnicity and concentrations of low to moderate income households are located either within or in close proximity to areas of high opportunity including transportation services, jobs and proficient schools.

A review of 2017 HUD Table 12 indicated that all protected class households and white, non-Hispanic households in the jurisdiction including residents of publically supported housing have higher (better) access to opportunity than the same classes in the region.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**

The region and jurisdiction is experiencing an increase in demand for housing due to an influx of new residents. By some estimates over 100,000 people are moving to the Portland Metro area every year. This current demand for housing is causing rapid rent increases and forcing low-income households to look for housing in other parts of the region including Clackamas County. A regional report: the Metro Housing Equity 2016 Report concluded that there is currently a shortage of 80,000 “missing middle” housing units in the region: “There are currently approximately 30,000 income-restricted units of housing regulated to remain affordable to households making less than 60 percent of median income, and approximately 73,000 units of market-rate housing that are affordable at this level (although rising rents will cause this number to diminish) in the four-county metro region. With over 185,000 households making less than 60 percent of median income, that leaves a shortage of more than 80,000 units of affordable housing.” Update: <https://www.oregonmetro.gov/tools-partners/guides-and-tools/guide-equitable-housing>

- b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.**

The Housing Authority of Clackamas County (HACC) does provide mobility counseling in the form of an educational video and pamphlets. HACC requires all clients to participate in this counseling whenever moving. This training is offered during our Orientation classes.

HACC does allow exception payment standards for families with disabilities called Reasonable Accommodation Payment Standards and allows families with disabilities to use a rent standard at 120% of the FMR which is 20% higher than the regular payment standard. HACC used to provide an exception payment standard for West Linn and Lake Oswego, but after 3 years and no changes in the leasing in these areas, HACC discontinued this program.

In an effort to increase the stock of affordable housing in areas of opportunity, HACC has opened Request for Proposals to encourage development by offering Project Based Vouchers (PBVs) and financial support for development. The most recent proposal resulted in 60 new units constructed with 21 Project Based Vouchers. HACC also provided PBVs to an affordable housing project to sustain it as affordable.

HACC continues to increase the number of participating landlords by dispelling misconceptions about Section 8 through Quarterly free Landlord Trainings. HACC landlord training events have had an average of 60 landlords attending per session.

An HACC Section 8 Program Manager provides outreach and training at local Landlord Associations and offers training and guidance on renting to Section 8 families.

The HACC website has a Landlord education page which includes videos on Fair Housing protections for Section 8 families.

HACC has recently been awarded \$25,000 from Meyer Memorial Trust to start a Deposit Assistance loan program to help families get into housing that would otherwise experience a barrier as they could not afford the rental deposit in the area they desire.

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- **Land use and zoning laws**
- **Community opposition**
- Impediments to mobility
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of regional cooperation
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- **Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs**
- **Source of income discrimination#2**
- Other

Clackamas County has no HUD identified RE/CAP areas and low segregation according to 2017 HUD provided Table 3. 2017 HUD Maps 5 and 6 indicated that publicly supported housing in all categories is distributed throughout the populated areas of the county. The County and the Portland Metro region are currently experiencing a housing crisis due to high demands for housing units. The current high housing demand is increasing the cost of purchasing homes and increasing the cost of rental housing.

Fair Housing Issues and Contributing Factors:

1. Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs.

Placement of new public housing developments. Oregon's Housing and Community Services administers the low Income Housing Tax Credit (LIHTC) program. In the Clackamas County jurisdiction there is only one census tract that is considered either a Qualified Census Tract (QCT) or a Difficult Development Area (DDA). The QCT and the DDA designations allow for more tax credits to be included (up to 30% more) in the project which increases the financial viability of those housing projects. Without more qualified census tracts for LIHTC credits the jurisdiction will continue to struggle with financing options for affordable housing projects. The one Qualified Census Tract in the jurisdiction is located in North Clackamas which is an area of high concentration of ethnicity and low-income households.

2. Land Use and Zoning Laws. Multi-family housing developments are typically restricted to areas in each community and throughout the jurisdiction that are zoned as high or medium density residential. Communities have many requirements for multifamily housing including: amenities such as onsite parking, fire access, buildings that "match" the character of the neighborhood and traffic impact studies, etc. All these requirements of multifamily housing projects increase the initial cost and result in housing that expensive to build and maintain. The state of Oregon has a land use plan (Goal 10) that requires all communities to allocate land for multifamily developments however some communities are more compliant than others. Housing advocates are beginning to challenge communities to meet the Goal 10 requirements.

3. Source of income discrimination, Segregation: Public housing residents report much difficulty in finding affordable rental units in general and in some communities in particular. The Fair Housing Council of Oregon continues process complaints regarding source of income discrimination. The Oregon State legislature recently passed legislation that landlords and property managers could not discriminate against persons with Section 8 or Housing Choice Vouchers as a source of rent, however, violations may still occur.

4. Community Opposition, segregation to specialized multifamily housing: some communities are resistant to change, particularly those communities that are primarily single family home communities with very few multifamily housing developments. More public relations and advocacy will need to occur in these communities to demonstrate the benefits of a range of housing choices for all residents in each community, particularly persons with disabilities, elderly persons and persons with diverse ethnic backgrounds. Respondents to the AFH community survey continue to express opposition to "Section 8 housing" due to fears that affordable housing somehow degrades the value of neighborhoods.

The public housing in the jurisdiction and in the region is competing with private market housing for land and for tax base dollars to each community. So far private single family housing is winning because homeowners bring property tax revenue to each community. Multifamily housing that is affordable to low-income tenants is typically run by a non-profit does not create much tax revenue other than the initial cost of building permits and

system development charges. The jurisdiction is also continuing to encourage siting multifamily developments in high opportunity areas encouraging density in areas such as the Clackamas Town Center and in North Clackamas.

D. Disability and Access Analysis

1. Population Profile

- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?**

The 2017 HUD census data Map 16 by disability type revealed that persons with disabilities live throughout the jurisdiction with no particular concentration areas. In the region, concentrations of persons with disabilities appear to be in urban centers including the cities of Portland, Beaverton and Vancouver, Washington.

The 2017 HUD census data Table 13 Disability by type presented data that persons with disabilities in the jurisdiction as a percentage of the population are similar to the percentages in the region. Persons with hearing difficulty are 4% of the jurisdiction and 3.69% of the region, Vision difficulty 1.64/1.99, Cognitive difficulty 4.64/5.27, Ambulatory difficulty 6.10/5.99, Self-care difficulty 2.56/2.47 and Independent living difficulty 4.11/4.35%. The difference between the jurisdiction and the region on Table 13 for each type of disability is never more than 0.63%.

- b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.**

The 2017 HUD census data Map 16 by disability type reveals that persons with disabilities live throughout the jurisdiction with no particular concentration areas. In the region, concentrations of persons with disabilities appear to be in densely populated urban centers including the cities of Portland, Beaverton and Vancouver, Washington.

2. Housing Accessibility

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.**

HUD has provided no data for this question at the time of this analysis. The 2017 HUD census data Map 5 revealed that Publicly Supported Housing was distributed throughout the region and in populated areas of the jurisdiction. A regional housing equity report has concluded that the Portland metro region has a shortage of 80,000 affordable housing units.

- b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?**

HUD has not provided any data for this question at the time of this analysis. The jurisdiction has no HUD identified R/ECAPs. Areas that have been identified by the jurisdiction as having “High Concentrations” of ethnic and low-income persons are located in populated areas that include several multi-family housing developments and manufactured housing parks.

- c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?**

The Housing Authority of Clackamas resident indicated that persons with disabilities were able to access publicly supported housing in the jurisdiction and in the region. In Public Housing 44% of residents in the jurisdiction have a disability while 34.55% of residents in the region for a difference of 10%. Of all the Project based Section 8 vouchers program 65% of residents had a disabled person in the household. The region may have more people who transition in and out of publicly supported housing than in the jurisdiction which has a more stable population.

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

- a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?**

The 2017 HUD Map 5 data revealed that Publicly Supported Housing was distributed through the region and in populated areas of the jurisdiction. Based on the limited data it appears that persons with disabilities are resided in integrated areas of the jurisdiction and the region.

The Clackamas County jurisdiction was home to a state mental health hospital that closed in 1995. Twenty-three years after the closing of Oregon's Dammasch State Hospital, a celebration was held to acknowledge the creation of new housing for persons with mental illness at the site of the former mental institution. The Villebois Community in Wilsonville has integrated 73 units of housing for the seriously mentally ill into a diverse village of 7,000 people. Most of the homes in this housing development have been built, rented and/or sold to private owners.

Source:

http://www.oregonlive.com/wilsonville/index.ssf/2013/10/wilsonvilles_villebois_communi.html

The jurisdiction’s Housing Authority owns and manages: 10 group homes for persons with developmental disabilities; 2 triplexes for persons with developmental disabilities; 4 group homes for persons with psychiatric disabilities; and a 21-unit apartment house for persons with psychiatric disabilities.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

The range of affordable housing options for persons with disabilities is limited based on the lack of availability of affordable housing units in general in the jurisdiction and the region. A recent study titled "Housing Needs for Individuals with Intellectual and Developmental Disabilities 2020" found that ... *"The housing markets along the West Coast are some of the most expensive in the nation because of a decade of underproduction and continued growth in the number of households. People who have fewer housing options – those with low incomes or large families, those who need accessible units, or those who need in-home supports – are often neglected by the majority of private market housing developers, who focus on building new housing for the general population and mass market needs. This can leave households of all types in precarious situations – living in undesirable locations or settings, living doubled up with friends or family, or paying too much for housing. This report's finding that 24,500 adults with IDD in the region – and potentially many more – may face housing instability warrants policy action to increase housing options and reduce risk. These individuals may be at risk of homelessness, curtailed independence, or a rapid, traumatic transition in care if a caregiver is suddenly unable to provide care or if housing costs increase."*

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:

- i. Government services and facilities
- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
- iii. Transportation
- iv. Proficient schools and educational programs
- v. Jobs

HUD is unable to provide data for this disability-related data for the jurisdiction or for the region.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

In the jurisdiction, persons with disabilities who face an access barrier can contact the particular public entity by phone or email to request an accommodation to access the jurisdiction's 16 government services, facilities and infrastructure. An inventory of all 16 government processes to request access to services, facilities and infrastructure is not currently available. The Clackamas County jurisdiction's 2 primary buildings where services are offered and public meetings occur, was audited by HUD for accessibility in 2010. The buildings and entrances were found to have a few accessibility issues including ramp slopes, height of service counters and bathroom stall grab bars and height of elevator buttons. These issues have been corrected accordingly.

Transportation services in the region are offered by TriMet which provides bus, light rail and commuter rail transit services in the Portland, Oregon, metro area. Each of the buses, light rail and commuter rail cars have individual accessibility features. More information is available here: <https://trimet.org/access/index.htm>, <https://trimet.org>, CUSTOMER SERVICE 503-238-7433. The jurisdiction has some city and county operated transportation services which are accessible to persons with disabilities.

Proficient schools and educational programs. The process for requesting and obtaining reasonable accommodations to proficient schools, educational programs may vary by school district. The jurisdiction has 10 public school districts which are serviced by the Clackamas Service District office: website: <https://www.clackesd.org/>.

The state Civil Rights Division (CRD), part of Oregon's Bureau of Labor and Industries (BOLI), is tasked with defending the rights of all Oregonians to equal opportunity in employment, housing, public accommodations and career schools. The investigators, managers and support staff that make up CRD are a crucial part of BOLI's mission: to protect employment rights, advance employment opportunities, and protect access to housing and public accommodations free from discrimination.

Oregon Bureau of Labor and Industry (BOLI) website: <http://www.oregon.gov/BOLI/CRD/>

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

No data on difficulties in achieving home ownership by persons with disabilities is available for this question at this time.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

2017 HUD Tables 9, 10 and 11 and HUD Maps 7 and 8 detailed disproportionate housing needs in the jurisdiction and the region however the data is not specific to persons with

disabilities. Housing staff in the jurisdiction conclude that disproportionate housing needs are experienced by persons with certain types of disabilities in the jurisdiction and the region at a similar rate to all low income persons in the jurisdiction and region. The greatest contributing factor is the general lack of affordable and accessible housing units for persons with disabilities and low-income households.

6. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.**

The Clackamas County Development Disabilities Program provides case management services, to 2,328 developmentally disabled persons in the jurisdiction. County staff guide persons with disabilities to resources and services that support the person, based on assessed needs and types of services requested. County staff may also assist persons with disabilities to enter into Foster Care or Group Home if needed. Some of the 792 of the 2,328 people may receive their case management from one of the five Support Service Brokerages that operate in the jurisdiction.

Of the persons served by the County Developmental Disabilities program, 16.4% are Hispanic, Hispanic-Mexican or Other Hispanic, 2.1% are Asian and 1.5% are Black. 77.3% of the total developmentally disabled persons provided with services are white.

- b. The program participant may also describe other information relevant to its assessment of disability and access issues.**

No other relevant data assessment of disability and access issues is available for this question at this time.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access to proficient schools for persons with disabilities
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- **Inaccessible sidewalks, pedestrian crossings, or other infrastructure**
- Lack of affordable in-home or community-based supportive services
- **Lack of affordable, accessible housing in range of unit sizes**
- Lack of affordable, integrated housing for individuals who need supportive services

- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Land use and zoning laws
- Lending Discrimination
- Location of accessible housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings
- Other

The greatest contributing factor for persons with disabilities and access to housing is the overall lack of affordable, accessible housing in range of unit sizes.

The second greatest contributing factor is a lack of access to publicly supported housing for persons with disabilities due to the lack of available units. This factor is detailed in the Housing Authority of Clackamas County November 2022 waiting list of over 1,800 households with 34% of households including a person with a disability.

The third contributing factor is Inaccessible sidewalks, pedestrian crossings, or other infrastructure in rural and low-income communities in the jurisdiction due to a lack of resources for sidewalks, pedestrian crossings and public infrastructure facilities. Clackamas County does fund some infrastructure projects including installation of accessible sidewalks in low-income rural areas in the jurisdiction on a limited basis. Cities in urban areas of the jurisdiction are also re-building streets and sidewalks to include accessible sidewalks and crosswalks.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. **List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.**

The jurisdiction has no unresolved HUD civil rights violations, no letters of findings, claims or lawsuits by the Department of Justice and no False Claims Act allegations.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The jurisdiction (unincorporated Clackamas County) has housing policies but not specific fair housing ordinances. The Clackamas County Comprehensive Plan (COMP Plan) updated in 2015 identified a number of housing issues including a forecast that 26 percent of the new dwelling units built in the next 20 years in the County, and 32 percent of the new units built in the northwest urban area, will be multifamily. Another housing issue identified in the Comp Plan was a Lack of affordable housing continues to be a problem, especially severe for households headed by the young, elderly, single parents, or handicapped individuals. A third housing issue identified for the County was a shortage of special living environments for the developmentally disabled and chronically mentally ill persons.

The Comp Plan's Chapter 6 contains Housing polices on: 6.A. Housing Choice Policies, 6.B. Affordable Housing Policies, Neighborhood Quality Policies, 6.D. Urban Infill Policies, 6.E. Multifamily Residential Policies, 6.F. Common-Wall Units Policies, 6.G Manufactured Dwelling Policies and, 6.H. Density Bonus Policy. These polices are in effect in unincorporated areas of Clackamas County only. In some cases the County sets policy for a particular community. In other cases the city in the jurisdiction sets fair housing, housing and land use policies.

The Lake Oswego City Code Chapter 34.22.060 listed protected classes including: Race, Color, Religion, National Origin, Sex, Familial Status, Mental or Physical Disability, Source of Income, Marital Status, Sexual Orientation and, Gender Identity.

In the region, the cities of Beaverton (City Code Chapter 5.16.015) and Portland (City Code Chapter 23.01), Hillsboro (City Code Chapter 9.34.005), Multnomah County (Co. Code 15.340) list the federally protected classes and Mental or Physical Disability, Source of Income, Marital Status, Sexual Orientation and, Gender Identity.

Oregon State (ORS 659A-145 &421) protected classes include: all federally classes, marital status, source of income, sexual orientation including gender identity, and domestic violence victims.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Clackamas County Social Services Division (SSD) has been operating a Housing Rights and Resources (HRR) fair housing program for the last 10 years. The Housing Rights and Resources program serves over 2,000 people per year with housing information and referral.

The HRR program provides bilingual staff to offer fair housing services to Spanish speaking residents of Clackamas County including assisting clients with filing HUD

discrimination complaint forms and information to landlords regarding their rights and obligations under the fair housing law. These services are also available to those speaking other languages with translation through the Language Line.

HRR program staff conduct a minimum of four training sessions with social service housing providers in Clackamas County (the jurisdiction). Program staff work closely with the social service agencies, housing programs and homeless shelters in Clackamas County to assure that clients with fair housing problems are referred for information and assistance.

HRR program staff also provide; technical assistance to agencies in the area of fair housing laws and regulations, housing counseling, and information and referral; publicize the fair housing program to the community; provide training on Reasonable Accommodations under the Fair Housing Law for individuals with disabilities, landlords, and other housing providers; and, coordinate with the fair housing programs in Multnomah and Washington Counties on regional education and planning efforts, as well as on individual fair housing cases.

Here is one story: A young mother called HRR with questions about moving fees. She had been living with her family in a second story apartment when one of her children was diagnosed with a disability. The family felt that moving to a ground floor unit would be necessary in order to keep their child safe at home. They offered documentation of their child's medical issues to the property manager which was refused. The family then submitted a request for a reasonable accommodation to allow them to move to a vacant ground floor unit. The request was ignored, but the property manager told them they could begin a brand new application for that unit. Paying new screening fees and deposits for the new application was a big expenses for this young family. HRR staff discussed options with the family who decided they would like a referral to Legal Aid so they could talk with a lawyer about how best to proceed.

The HRR program also works with the Fair Housing Council of Oregon and Legal Aid Services of Oregon to promote fair housing and conduct landlord and tenant training on the fair housing laws. The HRR program staff maintain an ongoing working relationship with the State of Oregon Civil Rights Division, U.S. Department of Housing and Urban Development, and Oregon Legal Services Corporation in order to promote fair housing rights.

Fair Housing Council of Oregon website: <http://fhco.org/>

The Fair Housing Council of Oregon (FHCO) is a state-wide civil rights organization whose mission is to eliminate housing discrimination through access to enforcement and education. FHCO is a non-profit corporation, not a governmental agency.

Legal Aid Services of Oregon website: <http://lasoregon.org/>

Legal Aid Services of Oregon (LASO) is a non-profit organization that provides representation on civil cases including housing complaint cases, like repair issues, housing

discrimination, and help with government housing programs for low-income clients throughout Oregon. Legal Aid Services of Oregon has field offices located in Albany, Bend, Klamath Falls, Newport, Pendleton, Portland, Salem, and Roseburg. Services for farm workers are available through our offices in Woodburn, Hillsboro and Pendleton. In addition, the Native American Program provides state-wide services and representation on Native American issues. The Central Administrative office for the program is located in Portland.

Oregon Bureau of Labor and Industry (BOLI) website: <http://www.oregon.gov/BOLI/CRD/>

The state Civil Rights Division (CRD), part of Oregon's Bureau of Labor and Industries (BOLI), is tasked with defending the rights of all Oregonians to equal opportunity in employment, housing, public accommodations and career schools. The investigators, managers and support staff that make up CRD are a crucial part of BOLI's mission: to protect employment rights, advance employment opportunities, and protect access to housing and public accommodations free from discrimination.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The jurisdiction's and the region's primary source for fair housing advocacy and education resources is the Fair Housing Council of Oregon (FHCO), a private non-profit organization. The Fair Housing Council has contracts with HUD and regional partners to conduct training and advocacy. Regional partners are coordinating fair housing efforts with FHCO.

The Fair Housing Council does not have the authority to enforce fair housing laws. FHCO was filing complaints with Oregon Bureau of Labor and Industries (BOLI) for both state and federal claims under the Fair Housing Act as Oregon state fair housing laws were substantially equivalent to federal fair housing law. Therefore HUD and BOLI had entered into a partnership contract whereby HUD would send any complaints claiming federal law violations to BOLI and/or BOLI could accept these same complaints directly. So filing with BOLI was the same as filing with HUD. However, a year ago BOLI was able to get the legislature to change one word in the state law (from "shall" to "may") which made Oregon state fair housing laws no longer substantially equivalent to federal fair housing laws. As a result HUD terminated its contract/partnership with BOLI as of April 3, 2016. This means that now all federal claims of fair housing violations will have to be filed directly with HUD. HUD has limited capacity to handle the additional workload. Therefore we are anticipating a backlog of complaints to be filed and investigated. This presents a potential barrier to a reasonable length of time for the resolution of complaints, and therefore justice for complainants. BOLI is still the agency to file state claims of fair housing discrimination.

- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.**

In 2012, budget cuts within Legal Aid Services of Oregon (LASO) and Oregon Law Center (OLC) lead to the closure of an office in Clackamas County and to a 20% reduction in staff positions statewide.

In order to try to meet the overwhelming need for legal services, LASO provides a range of legal services from individualized advice to full representation in a limited action, eviction defense or longer term affirmative cases filed in court. LASO is limited from litigating all of the cases that have merit or meet our priorities from lack of resources and adequate staffing to meet the need. Accordingly, LASO must choose strategically which of those cases with merit will have a larger impact on the communities we serve. In essence, we try to get more bang for our buck.

The Housing Rights and Resources program (HRR) referrals provide an essential channel of clients with housing complaints. In 2015-16, LASO PRO received hundreds of HRR referrals. About 75% of the HRRP-funded cases were closed with advice after consultation. Approximately 25% were closed after full representation of the HRR funded cases are what LASO defines as full representation – a case litigated in court, an administrative proceeding, a negotiated settlement or limited action.

LASO PRO places an emphasis on litigating affirmative fair housing cases and/or habitability cases with larger landlords that prey on or whose practices have an effect on vulnerable populations. Civil legal services is an essential component to fair housing enforcement the goals of affirmatively furthering fair housing. To increase the level of impact to larger populations, the ratio of intake and advice to full representation needs to shift so that LASO can litigate more priority cases to more effectively address housing problems in Clackamas County. Additional litigation requires increased attorney staff and other resources.

The regional FHCO recently hired a new executive director with experience in land use issues. Allan Lazo started as the new Executive Director of the Fair Housing Council of Oregon on May 4, 2016. Allan's past experience includes serving on the Gresham Planning Commission (a local city) and working with FHCO on fair housing education and outreach.

FHCO also is continuing to increase its capacity in providing technical assistance in the area of Affirmatively Furthering Fair Housing (AFFH). AFFH is a technical area of the federal Fair Housing Act that has the potential to positively impact

systemic issues related to housing opportunities, such as land use decisions by local jurisdictions that may disparately impact members of protected classes.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- **Lack of local public fair housing enforcement (2)**
- **Lack of resources for fair housing agencies and organizations (1)**
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

1. Lack of resources for fair housing agencies and organizations: Regionally FHCO is funded by HUD for advocacy and education. Each jurisdiction in the region contracts with FHCO to conduct training. Only \$10,000 in the jurisdiction is expended for landlord and tenant training. The jurisdiction has no funding for audit testing and as such no good data on the extent of fair housing violations. FHCO gets over 2000 calls per year regarding potential discrimination and violations of the fair housing laws. Nationally only 10% of violations are ever reported therefore perhaps as many as 90% of violations are never reported. The Fair Housing Council of Oregon has no authority to enforce fair housing laws.

2. Lack of local public fair housing enforcement. In 2016, HUD terminated its contract with BOLI because BOLI changed Oregon state law to make it no longer substantially equivalent to federal law. Therefore all federal complaints of housing discrimination must now be filed with HUD instead of BOLI. HUD has not yet increased HUD capacity to handle the increased workload. There is currently no state, county or local government agency to enforce federal fair housing laws. BOLI still has the authority and capacity to enforce violations of state fair housing laws.

FHCO a private, non-profit that does education and outreach. Any other requested activities would have to be fee-for-service. FHCO is not and never has been an enforcement agency in the sense that it has the power to hold a respondent liable for not following the law or legally forcing a resolution to a complaint. FHCO has been a civil rights organization that advocates for victims of fair housing discrimination. FHCO also does advocacy for victims of fair housing complaints.

If FHCO is unsuccessful in resolving the matter informally for the complainant, FHCO will frequently draft administrative complaints and represent complainants in the administrative process. FHCO also files complaints as FHCO for purposes of enforcing fair housing laws. In many cases FHCO has been able to find a private attorney to take a case where the administrative agency has found substantial evidence of discrimination.

VI. Fair Housing Goals and Priorities

- 1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.**

The Contributing Factors listed below are listed in order of priority with #1 being the highest priority and #11 being the lowest priority. No change since 2017.

1. Lack of affordable, accessible housing in a range of unit sizes. The jurisdiction and the region is currently in a rapid population growth after an economic slow period. The rapid population growth is bringing an estimated 100,000 people per year to the region, which is increasing the demand for housing units to own or rent. Low income households and protected classes are directly impacted by the increased housing demand. The waiting list for public housing in the jurisdiction was more than 6000 households in 2014. A 2015 regional Housing Equity Report found that the region has a shortage of 80,000 units of affordable housing. The majority of resident feedback during community meetings was that most people liked where they lived, however, many people including persons with disabilities felt that it was very difficult to find another affordable unit should they want to move. Though current state law provides a mechanism to ensure that a certain percentage of new development is reserved for low-income tenants (known as “inclusionary housing” or “inclusionary zoning”), this jurisdiction has not yet enacted or implemented this structure.

Habitable housing is healthy housing free of leaks, mold and pests. Unhealthy rental housing is poorly maintained and generally occupied by low-income vulnerable populations. The critical shortage of affordable rental housing units in the jurisdiction and, the law allowing no cause evictions, makes tenants fearful of requesting repairs due to risk losing their housing from retaliation and eviction. Housing survey respondents and comments during community meetings exposed that vulnerable populations including fair-housing protected groups such as

people of color, families with children and persons with disability are forced to live in unhealthy conditions because no other housing is available to them.

2. Availability of affordable units in a ranges of sizes: The 2016 public housing wait list was more than 4,000 households requesting assistance. The current housing market has a vacancy rate of less than 2% which is causing rents to increase monthly in some cases. Apartment buildings are being purchased and remodeled to increase rent revenue while many people are being given “no cause” evictions. The largest city in the region, Portland, Oregon has proposed enacting a 3-month eviction/rent increase moratorium to provide renters time to find new units or adjust to the rent increase.

3. Displacement of residents due to economic pressures: The city of Portland declared a homeless housing emergency in October 2015 to increase efforts to find solutions to homelessness and the housing shortage crisis. The high demand for private market housing has increased rent levels by 300% in some cases. Under current law, private landlords can evict residents without a reason (“no-cause eviction”) and this type of eviction frequently masks unlawful eviction that is retaliatory or discriminatory. There is no legal mechanism for stabilization of rents in Oregon. Evicted residents in urban areas close to jobs, schools and services are being pushed out to suburban areas to find affordable rental units, however, less than 5% of housing units are available to rent. Evicted residents in urban areas close to jobs, schools and services are being pushed out to suburban areas to find affordable rental units, however, less than 2% of housing units are available to rent. The end result is a concentration of poverty and minority households outside areas of high public investments. In some instances, lower-income minority households are being displaced out of one jurisdiction and into specific areas of adjacent jurisdictions that lack the social and physical amenities of their prior homes.

4. Community opposition: Affordable housing projects when proposed often face community opposition to affordable “housing projects” that bring “poor people” into a neighborhood. Many homeowners are concerned that “Section 8” housing and other affordable housing units will degrade property values in expensive neighborhoods. Low-income and protected classes that currently live in these communities would directly benefit from new affordable housing units. Oftentimes, multi-family units may only be constructed where the land has been zoned as high or medium density residential. Community Opposition is

institutionalized by smaller communities with city councils and land use planning boards that write zoning and land use ordinances which prohibit or allow new multi-family and affordable housing projects. These zoning and land use ordinances may further concentrate poverty or segregate low-income people out of communities.

5. Site selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. Oregon’s Housing and Community Services administers the low Income Housing Tax Credit (LIHTC) program. In Clackamas County, there is only one census tract that is considered either a Qualified Census Tract (QCT) or a Difficult Development Area (DDA). The QCT and the DDA designations allow for more tax credits to be included (up to 30% more) in the project, which increases the financial viability of those housing projects. Without more qualified census tracts for LIHTC credits the jurisdiction will continue to struggle with financing options for affordable housing projects and perpetuate concentrations of poverty.

Additional concern is the lack of reliable data on the minority households within the LIHTC housing. HUD provided data (Table 8) is 5 years out of date at the time of this report. As a result, it is very difficult to track whether or not minority households that qualify for LIHTC are actually adequately represented in the tenant population or if there are additional barriers in the housing application and screening process that may violate fair housing laws. Lastly, because of community opposition to “subsidized” housing, the majority of LIHTC that are built restrict the tenant population to seniors. This type of housing is found most often in the higher income, predominantly white communities with the most social and physical amenities (transportation, access to good schools/grocery stores) while “subsidized” housing for minority families are often located outside of such areas of high opportunity.

6. Lack of assistance for housing accessibility modifications: The Clackamas County jurisdiction operates one program with limited funding to assist low-income households with accessibility modifications to their homes. The Housing Access Grant provides small grants to approximately 20 households per year. This program could be expanded to serve more low-income families. Persons with disabilities surveyed and interviewed during community participation meetings expressed their need for more units of affordable and accessible units to increase housing choice.

7. Private discrimination: Private discrimination in the housing rental market continues to affect housing choice for vulnerable populations and protected classes in the region and the jurisdiction. The Fair Housing Council complaint data for the jurisdiction from July 1, 2014 to June 30, 2015 had 92 complaints. The Housing Rights and Resources (HRR) program assisted over 800 households to understand their rights and responsibilities as tenants. 80 households had potential discrimination cases. Private discrimination also occurs frequently with persons who have a criminal history which is a barrier to accessing housing. Private discrimination for a criminal history is one of the collateral “downstream” impacts of the racial and ethnic disparities in our local criminal justice system. A recently released report of data from Multnomah County found African-Americans were four times more likely to be stopped, arrested, charged and sentenced more harshly than their white counterparts despite their relatively low presence in our communities. This discrimination is having a disparate impact on African American and Hispanic men and their families. HUD has begun providing training to fair housing organizations and housing providers to consider additional screening criteria to prevent a disparate impact in these populations seeking access to housing in the region and the jurisdiction.

Private discrimination may also occur when requests for repairs are ignored by property managers. Habitable housing is healthy housing free of leaks, mold and pests. Unhealthy rental housing is poorly maintained and generally occupied by low-income vulnerable populations. The critical shortage of affordable rental housing units in the jurisdiction makes tenants fearful of requesting repairs due to risk losing their housing from retaliation and eviction.

Private discrimination may also occur when tenants are evicted for “no cause” which is legal in the region and the jurisdiction although a few cities in the jurisdiction have or are considering enacting 90-day notice requirements for large rent increases or eviction notices. The increase in the number of “no cause” evictions may also be a result of the economic pressures faced by investors and property owners in a high demand housing market such as the current Portland metro area housing market.

8. Lack of public fair housing enforcement: The jurisdiction has no public agency to enforce fair housing. In the region and the state, there are 2 only enforcement agencies: HUD and the Oregon Bureau of Labor and Industry (BOLI). Recently, HUD withdrew federal funds from BOLI because of a recent change in state law that eliminated BOLI’s legal capacity to enforce federal fair housing laws. Although BOLI technically has the authority to enforce the state

fair housing laws, BOLI has reduced the number of cases the agency is willing to enforce due to funding limitations.

In 2012, budget cuts within Legal Aid Services of Oregon (LASO) and Oregon Law Center (OLC) lead to the closure of an office in Clackamas County and to a 20% reduction in staff positions statewide. In the five county region that LASO Portland Regional Office serves, which now includes Clackamas County, over 200,000 people meet LASO income guidelines. Approximately 36,000 people are living in poverty in Clackamas County and are eligible for legal help. Additionally, there is a higher and increasing rate of poverty among the Latino population in Oregon. In Clackamas County, according to the 2011-13 American Community Survey, the number of Latino residents living in poverty was at 18%, a number double that of whites in Clackamas County.

9. Lack of resources for fair housing agencies and organizations: The jurisdiction has one program to assist low-income persons with housing information and referral. Potential housing discrimination complaints are directed to the Legal Aid Services of Oregon, the Fair Housing Council of Oregon and/or the Oregon Bureau of labor and Industry for investigation and possible legal action. The Fair Housing Council of Oregon has no office in the jurisdiction. The Legal Aid Services of Oregon recently closed an office in the jurisdiction due to lack of funding. The Oregon Bureau of labor and Industry is no longer conducting housing discrimination legal actions and is no longer recognized by HUD as equivalent to HUD for enforcement actions.

10. Land Use and Zoning Laws: the Oregon Legislature passed House Bill 2003 along with House Bill 2001 in 2019 to reduce land-use limitations to legalize middle housing. HB 2003 requires that Oregon cities with a population of 10,000 or more study the future housing needs of their residents. It also requires them to develop strategies that encourage the production of housing their residents most need. To supplement these requirements, the bill initiated a prototype Regional Housing Needs Analysis (RHNA) to investigate a program where housing needs are estimated and allocated on a regional level. Oregon Housing and Community Services released this report in February 2021, which emphasized the need for the RHNA. With House Bill 2001, the state legislature took a historic step to reducing the regulatory barriers to building more affordable and accessible housing in every community in Oregon. Additionally, the new Housing Production Strategies (HPS) document requires cities to come up with plans to address how they will more equitably meet their housing needs.

By supporting more housing types, housing opportunity is addressed as well. Previously, because of land use restrictions, multi-unit housing often had been restricted to only certain parts of town. Now that cities must allow duplexes on single-family lots, it can create housing that is more affordable for those who would like to live there.

One type of housing that is now easier to build on single-family lots is Accessory Dwelling Units (ADUs). ADUs have the opportunity to create greater housing affordability.

11. Inaccessible sidewalks, pedestrian crossings, or other infrastructure:

Persons with mobility disabilities continue to face barriers in their communities. Rural communities and low-income urban areas lack resources to build sidewalks, pedestrian crossings and other accessible infrastructure for persons with disabilities. The jurisdiction does fund some infrastructure projects in these low-income rural areas on a limited basis. Cities in urban areas of the jurisdiction are also re-building streets and sidewalks to include accessible sidewalks and crosswalks.

2. **For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.**

The new Clackamas County AFH Goals for 2022 to 2026 are as follows:

Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County.

Strategies:

1.A: Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units and ensure that those units will last for years to come.

1.B: Maximize the number of households receiving long term and short term rental assistance from local, state and federal programs.

1.C: Evaluate zoning changes & incentives for building affordable housing including rezoning of vacant commercial properties into mixed-use buildings or using eminent domain or other methods to buy vacant properties to be used for housing programs.

Goal 2: Expand fair housing outreach, education, and enforcement
Strategies:

2.A: Increase fair housing education for staff, landlords & community partners.

2.B: Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions.

2.C: Work in collaboration with partners to enforce fair housing law.

2.D: Continue operating the Housing Rights and Resources line, which is a partnership between Clackamas County Social Services, Clackamas County Community Development, Legal Aid Services of Oregon, and Fair Housing Council of Oregon to provide information about fair housing law to landlords and tenants in Clackamas County

Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.

Strategies:

3.A: Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.

3.B: Minimize barrier and ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes.

3.C: Provide multiple ways for County residents to access services and information. Email, phone, text, in-person, etc. Ensure that outgoing messages are available in multiple languages and all staff have access to interpretation services quickly and efficiently.

These goals and strategies will be monitored by several divisions of Clackamas County including the Housing Authority, the Community Development Division and the Social Services Division

Appendix A Local Data Sources

Summaries:

1. Clackamas County Metro Bond Local Implementation Plan

Part of a three county regional approach to address homelessness. The Plan details investments of local tax bond measure revenues in homeless services and housing for primarily chronic homelessness persons. The measure prioritizes 75% of funds for extremely low-income households (0-30% Median Family Income [MFI]) with at least one disabling condition who are experiencing or at imminent risk of experiencing long-term literal homelessness.

The remaining 25% will be devoted to services for very low-income households (up to 50% MFI) who are either experiencing or are at substantial risk of experiencing homelessness. Within both of those groups, the Measure also prioritizes Communities of Color which have historically faced housing discrimination in Oregon and Clackamas County.

Clackamas County's Local Implementation Plan was developed with guidance from an advisory body, the newly formed Supportive Housing and Services Steering Committee. The Committee included voices from local government, service providers, and people with lived experience, faith organizations, Communities of Color, and business groups. The Plan was also shaped by an extensive community engagement process that prioritized Communities of Color and included a series of focus groups and a survey of more than 116 community members and stakeholders. The Plan identified 3,206 Clackamas County households needing housing and housing services to reduce and prevent homelessness.

2. 2021 County DTD Expanding Housing Choice Survey

A survey of 522 English and Spanish speaking homeowners in the North Clackamas Area and the Canby area conducted in May 2021 by the Clackamas County Department of Transportation and Development. This survey was in response to an Oregon state law (HB2001) requiring all cities to allow land use zoning for multifamily or "middle" housing construction within all city limits in Oregon. Respondents were in favor of "middle" housing types particularly cottage clusters but were concerned about increased car traffic and the availability of on street parking. Respondents were also in favor of additional housing types to increase the demographic diversity of neighborhoods. Link to Survey Results: <https://www.clackamas.us/planning/hb2001>

3. 2019 Homelessness and Housing Affordability

The 2018 Affordable Housing and Homelessness Policy Task Force was an advisory body appointed by the Clackamas County Board of County Commissioners to research, recommend and support new policies and strategies on increasing housing affordability and alleviating homelessness in Clackamas County. The Task Force gathered information

and made specific near-term recommendations on regulatory changes and mechanisms that would foster the maintenance and development of affordable housing for all income levels, including those who are homeless. Link to Report:

<https://www.clackamas.us/homelessness/taskforce.html>

The Final Report made 19 recommendations divided into five categories:

1. Shelter off the streets and services for the currently unsheltered
2. Planning, zoning and development
3. Housing services for those experiencing homelessness or at-risk of being homeless
4. Tenant protections
5. Funding

4. Performance Clackamas MFR

Clackamas County adopted Performance Clackamas in 2014. The living plan is updated when appropriate. The current plan was adopted by the Board of County Commissioners in March 2021. Link to plan: <https://www.clackamas.us/performance>.

Performance Clackamas focuses on measurable goals encompassed by five strategic priorities:

- Build public trust through good government
- Grow a vibrant economy
- Build a strong infrastructure
- Ensure safe, healthy and secure communities
- Honor, utilize, promote and invest in our natural resources

Each priority has two corresponding strategic goals that help guide the efforts of our elected officials, our administration and county staff for years to come.

5. 2018 State of Oregon Fair Housing Report

Oregon's 2016-2020 Analysis of Impediments to Fair Housing Choice (AI) identifies various impediments and barriers to fair housing choice, and suggested actions to address those impediments. Based on the AI, Oregon developed a 2016-2020 Fair Housing Action Plan (FHAP).

Link to report: <https://www.oregon.gov/ohcs/development/Documents/conplan/2018-FHAP-Report.pdf>

Research Findings:

- 1: Persons with disabilities face widespread barriers to housing choice statewide.
- 2: Discrimination against protected classes persists statewide.
- 3: Residents lack knowledge of their fair housing rights, are not empowered to take action and have very limited fair housing resources locally.

- 4: In many rural areas, credit is limited for residents who want to buy homes and developers who want to build multifamily housing.
- 5: Condition of affordable housing is generally poor in rural areas.
- 6: Oregon's state laws may limit the ability of cities and counties to employ programs that are known to create a significant amount of affordable units in many other jurisdictions.
7. State laws and local practices, coupled with lack of housing in rural areas; create impediments to housing choice for persons with criminal backgrounds.

6. 2018 County Regional Housing Needs Assessment

This report is Clackamas County's Regional Housing Needs Analysis for the 2019 to 2039 period. The report was required to comply with Oregon statewide planning policies that govern planning for housing and residential development, including Goal 10 (Housing), OAR 660 Division 7, and OAR 660 Division 8. The methods used for this study generally follow the *Planning for Residential Growth* guidebook, published by the Oregon Transportation and Growth Management Program (1996).

DEMOGRAPHIC AND SOCIOECONOMIC FACTORS AFFECTING HOUSING CHOICE Page 41

Many demographic and socioeconomic variables affect housing choice. However, the literature about housing markets finds that age of the householder, size of the household, and income are most strongly correlated with housing choice.

- **Age of householder** is the age of the person identified (in the Census) as the head of household. Households make different housing choices at different stages of life. This chapter discusses generational trends, such as housing preferences of Baby Boomers, people born from about 1946 to 1964, and Millennials, people born from about 1980 to 2000.
- **Size of household** is the number of people living in the household. Younger and older people are more likely to live in single-person households. People in their middle years are more likely to live in multiple person households (often with children).
- **Income** is the household income. Income is probably the most important determinant of housing choice. Income is strongly related to the type of housing a household chooses (e.g., single-family detached, duplex, or a building with more than five units) and to household tenure (e.g., rent or own).

7.2021 Coalition of Communities of Color Community Engagement Report Community Engagement Report -- Phase Two Outside Metro Boundary Spring 2021

Community Engagement Results:

Concerns about Living in Rural Clackamas County

1. Racism, discrimination, and cultural bias

Participants shared experiences of racism and discrimination they had directly encountered or had heard about indirectly. Many who shared these experiences identify as Latinx.

2. Unaffordable and insecure housing

Participants' pressing and immediate concerns were about the lack of affordable housing options in rural Clackamas County. Without mandated rent caps, especially for low-income people and families, consistently increasing rents and the cost of utilities puts tremendous pressure on maintaining stable housing.

3. Lack of local services

The most commonly stated services that were lacking in rural Clackamas County include:

- Unreliable public transportation and lack of investment in public transportation
- Services in languages different from English
- Emergency shelters
- Healthy food options resulting in rural food deserts

Resources Needed in Rural Clackamas County

4. More housing options (quotes from community members)

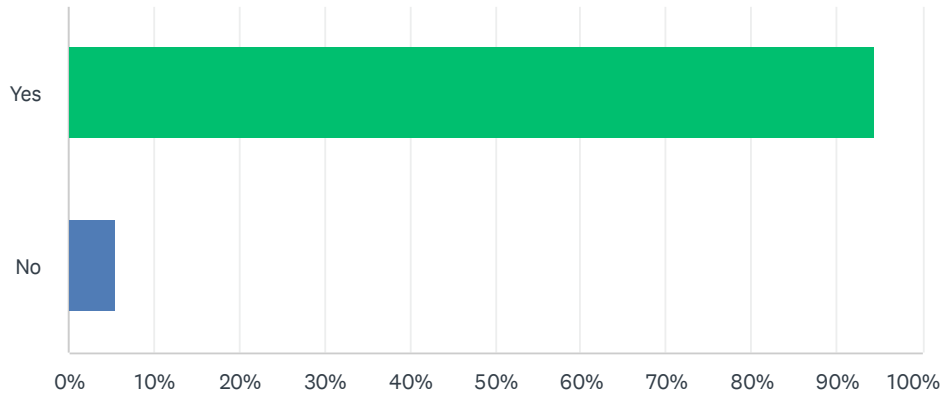
“We are looking for more first time home buyer assistance”

“I would like to see the county providing tiny homes, vocational training to help build tiny homes, looking at land for communal living spaces, land for growing food, trailers and manufactured homes, pipeline programs and creating pathways to homeownership.”

Appendix B

Q1 Do you live in Clackamas County?

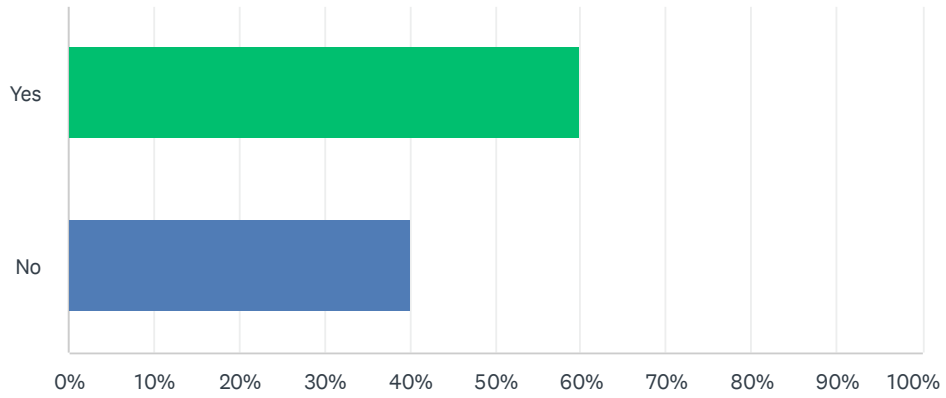
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ANSWER CHOICES	RESPONSES	
Yes	94.44%	289
No	5.56%	17
TOTAL		306

Q2 Do you work in Clackamas County?

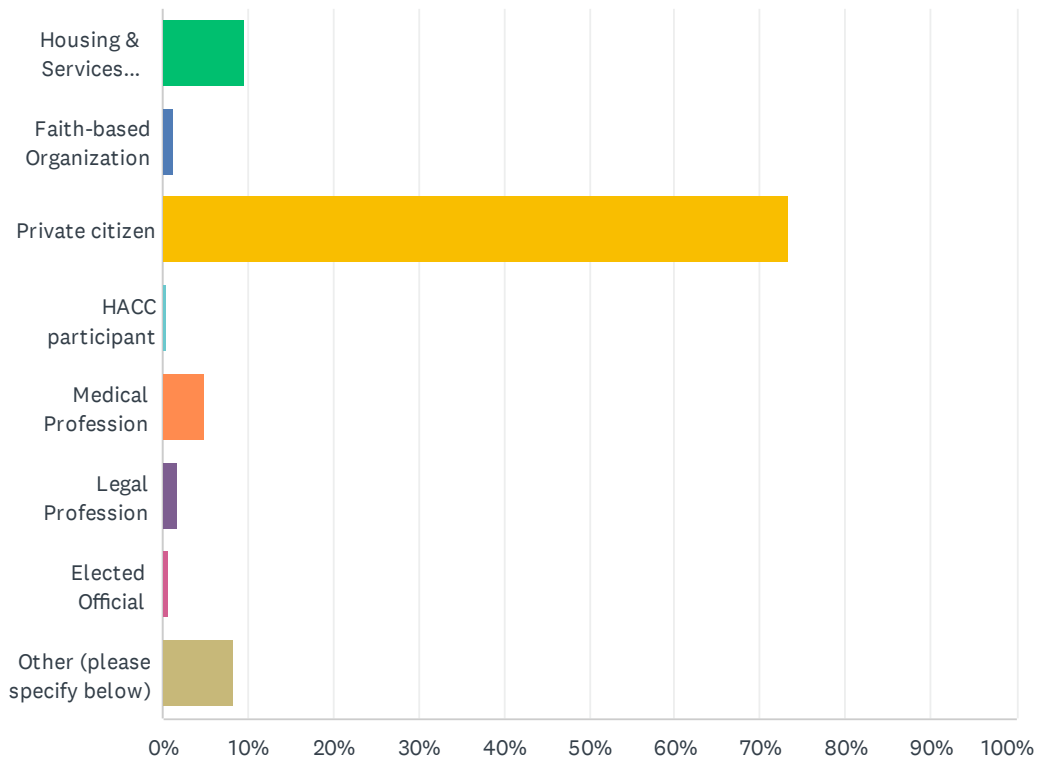
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ANSWER CHOICES	RESPONSES	
Yes	59.87%	182
No	40.13%	122
TOTAL		304

Q3 What best describes your perspective?

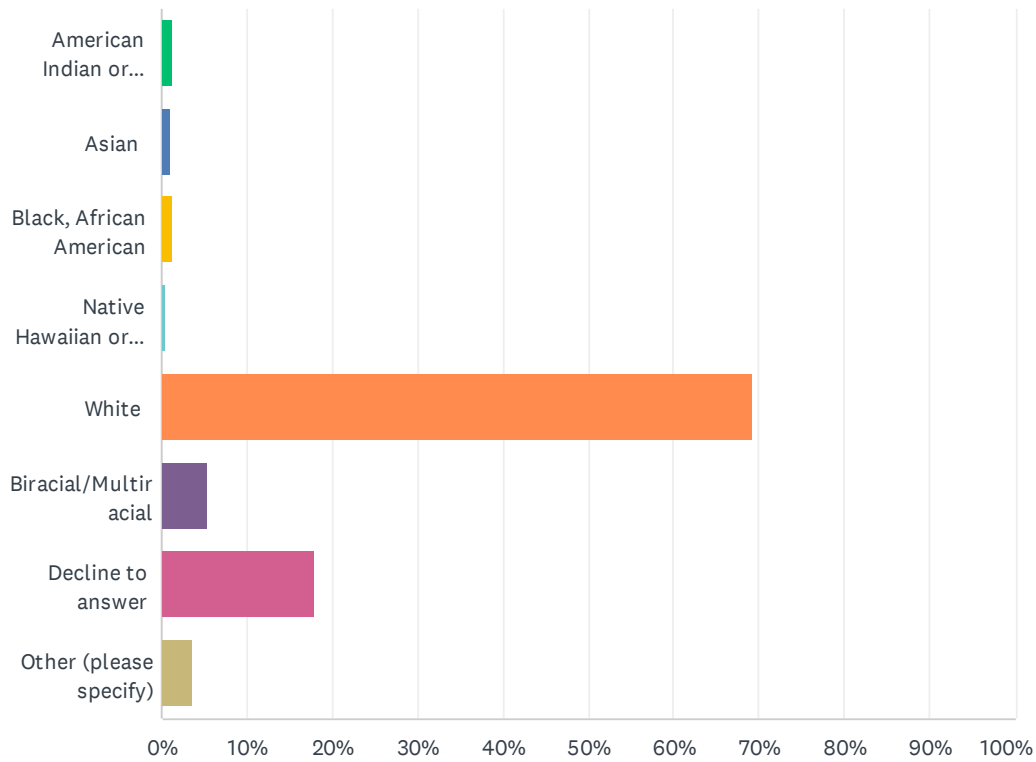
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ANSWER CHOICES	RESPONSES	
Housing & Services Provider	9.57%	29
Faith-based Organization	1.32%	4
Private citizen	73.27%	222
HACC participant	0.33%	1
Medical Profession	4.95%	15
Legal Profession	1.65%	5
Elected Official	0.66%	2
Other (please specify below)	8.25%	25
TOTAL		303

Q4 How would you best describe yourself?

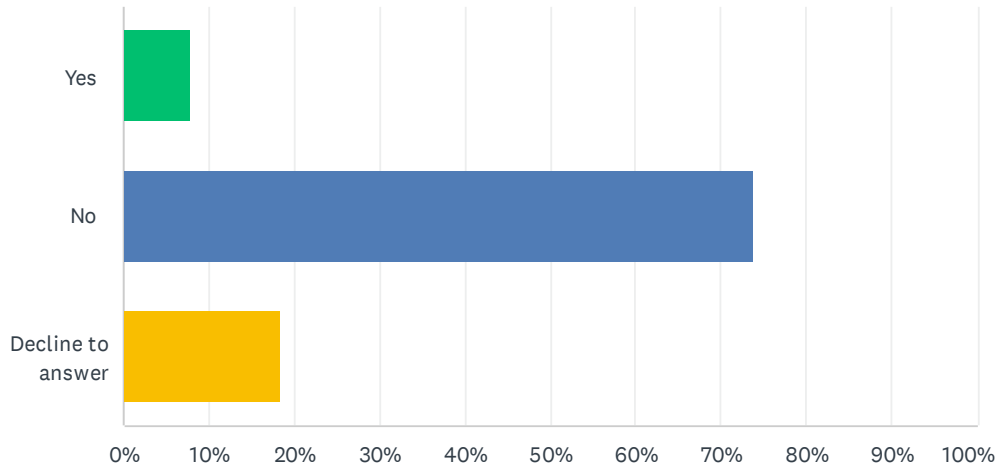
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ANSWER CHOICES	RESPONSES	
American Indian or Alaska Native	1.32%	4
Asian	0.99%	3
Black, African American	1.32%	4
Native Hawaiian or Other Pacific Islander	0.33%	1
White	69.21%	209
Biracial/Multiracial	5.30%	16
Decline to answer	17.88%	54
Other (please specify)	3.64%	11
TOTAL		302

Q5 Are you of Hispanic, Latino, or Spanish origin?

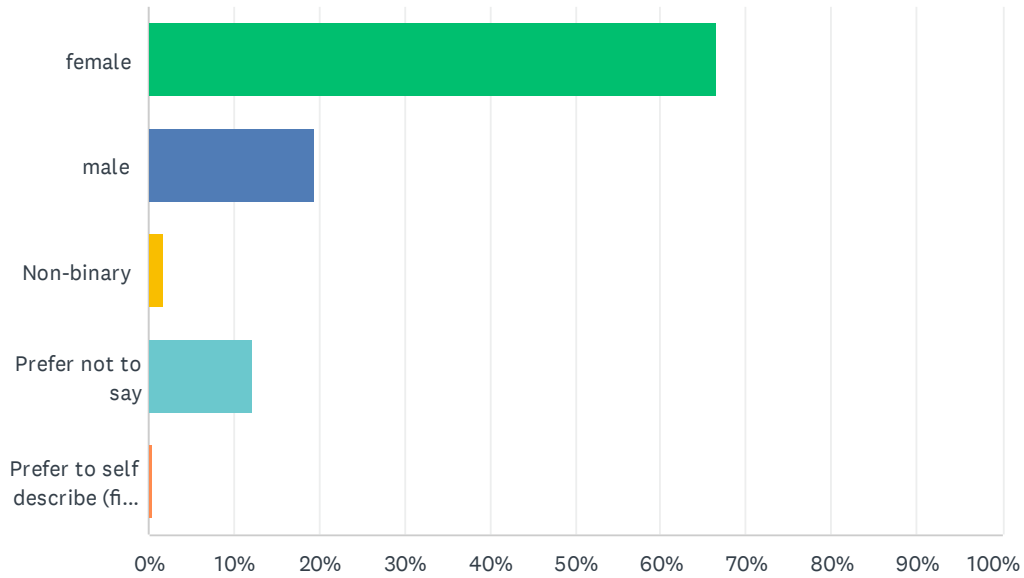
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ANSWER CHOICES	RESPONSES	
Yes	7.84%	24
No	73.86%	226
Decline to answer	18.30%	56
TOTAL		306

Q6 What is your gender?

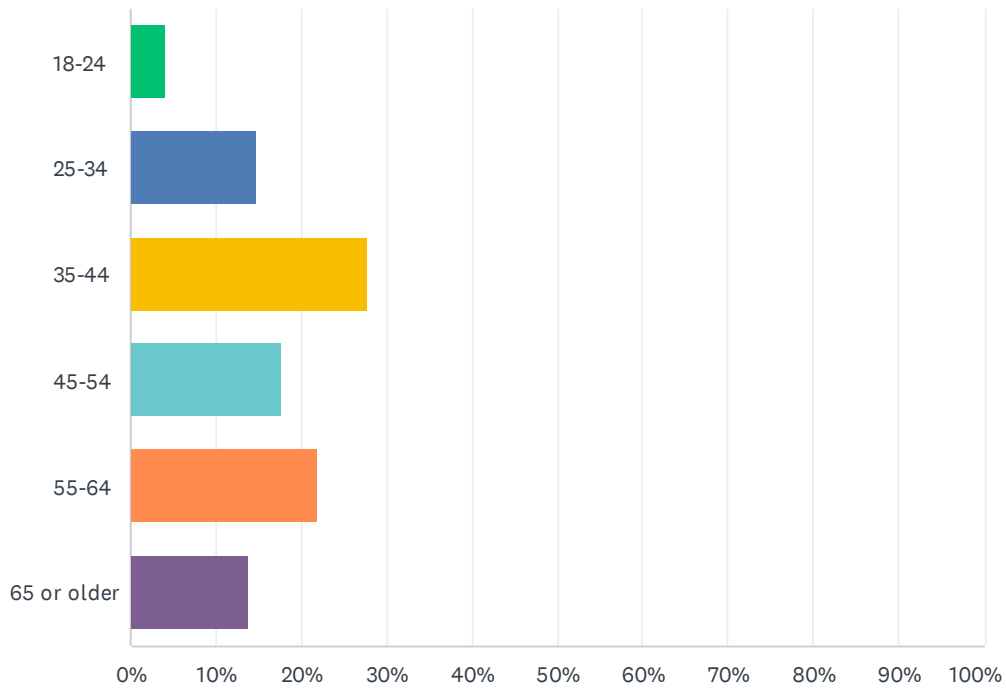
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ANSWER CHOICES	RESPONSES	
female	66.45%	202
male	19.41%	59
Non-binary	1.64%	5
Prefer not to say	12.17%	37
Prefer to self describe (field below)	0.33%	1
TOTAL		304

Q7 What is your age?

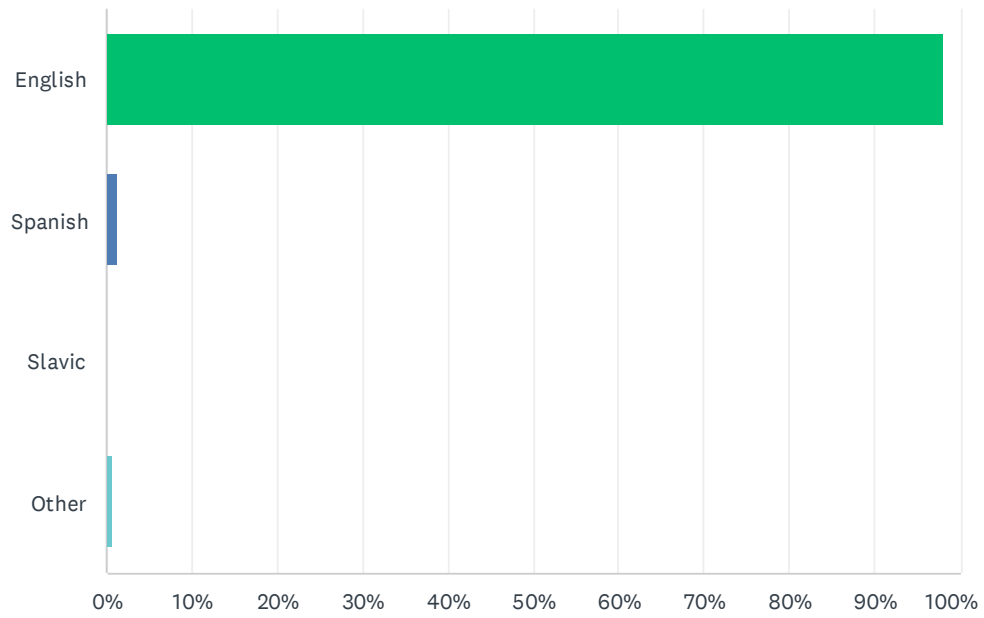
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ANSWER CHOICES	RESPONSES	
18-24	3.95%	12
25-34	14.80%	45
35-44	27.63%	84
45-54	17.76%	54
55-64	22.04%	67
65 or older	13.82%	42
TOTAL		304

Q8 What is your primary language?

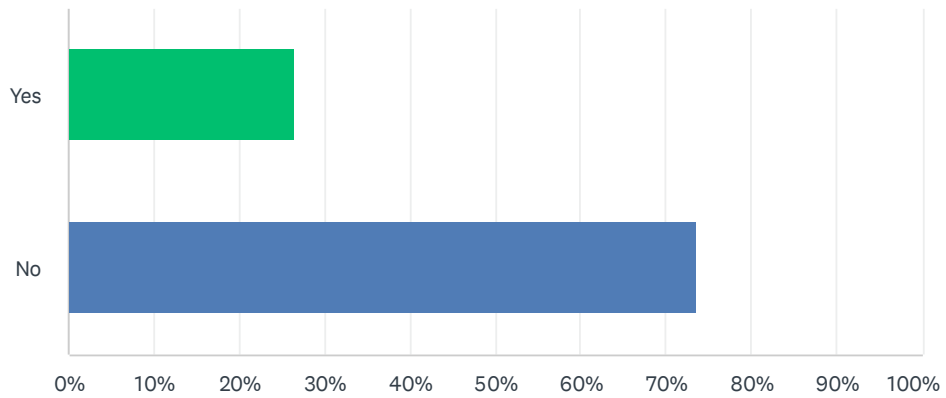
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ANSWER CHOICES	RESPONSES	
English	98.02%	297
Spanish	1.32%	4
Slavic	0.00%	0
Other	0.66%	2
TOTAL		303

Q9 Does anyone in your household have a mental or physical disability?

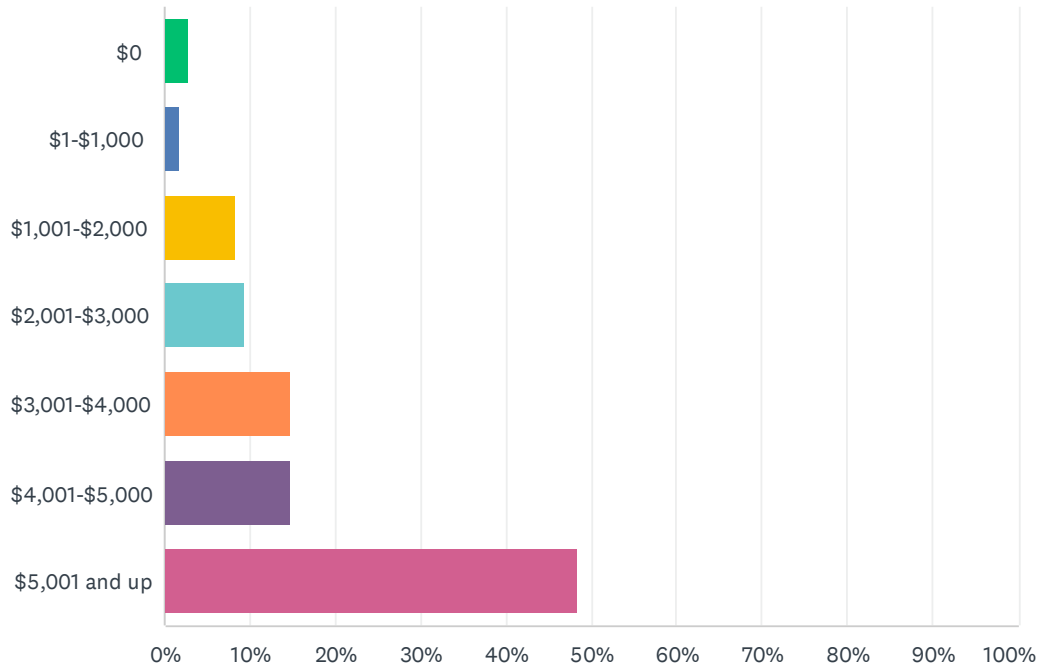
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ANSWER CHOICES	RESPONSES	
Yes	26.49%	80
No	73.51%	222
TOTAL		302

Q10 How much money does your household earn every month (include all sources of funds/income)?

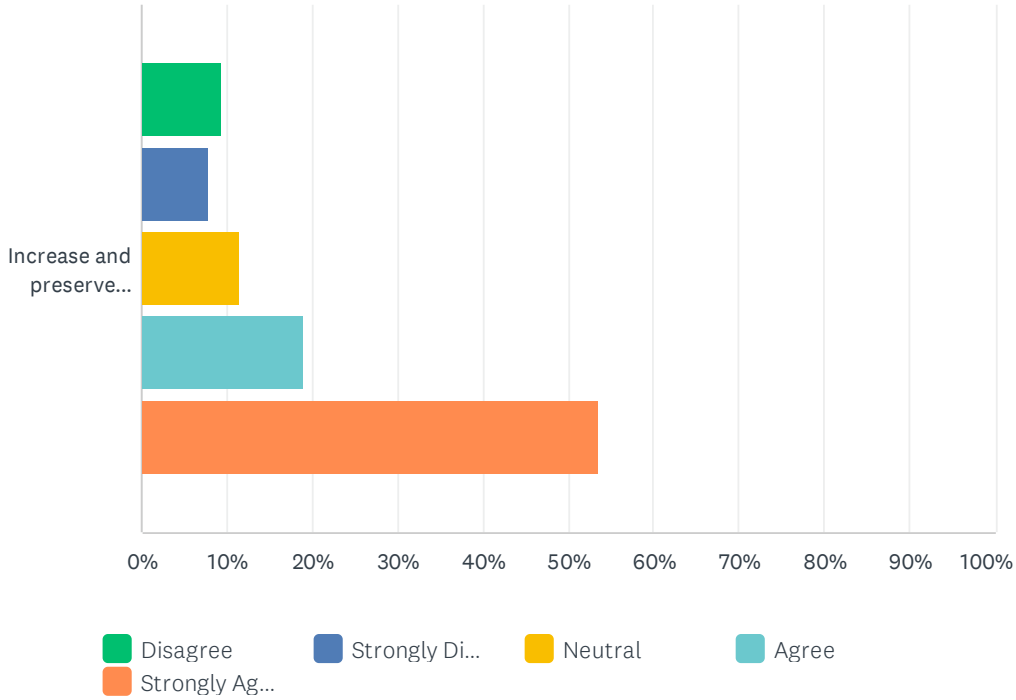
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ANSWER CHOICES	RESPONSES
\$0	2.87% 8
\$1-\$1,000	1.79% 5
\$1,001-\$2,000	8.24% 23
\$2,001-\$3,000	9.32% 26
\$3,001-\$4,000	14.70% 41
\$4,001-\$5,000	14.70% 41
\$5,001 and up	48.39% 135
TOTAL	279

Q11 Goal #1 - Rate the following proposed Fair Housing Goal and include any feedback below.

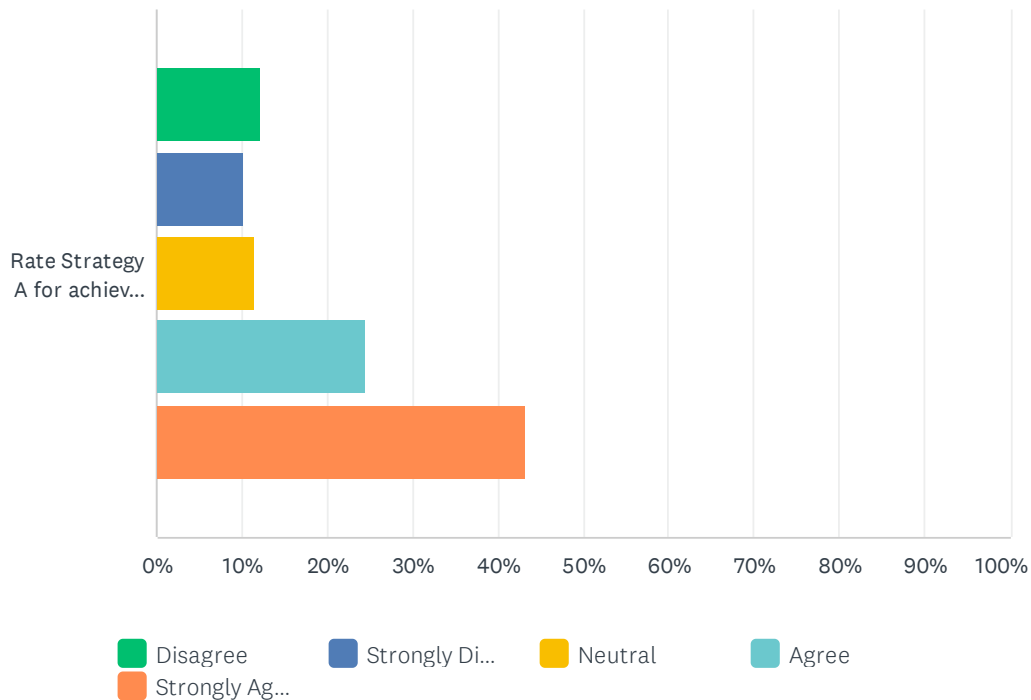
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	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Increase and preserve affordable, accessible housing options throughout Clackamas County	9.48% 29	7.84% 24	11.44% 35	18.95% 58	53.59% 164	306

Q12 Strategy A for Goal #1: Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units and ensure that those units will last for years to come.

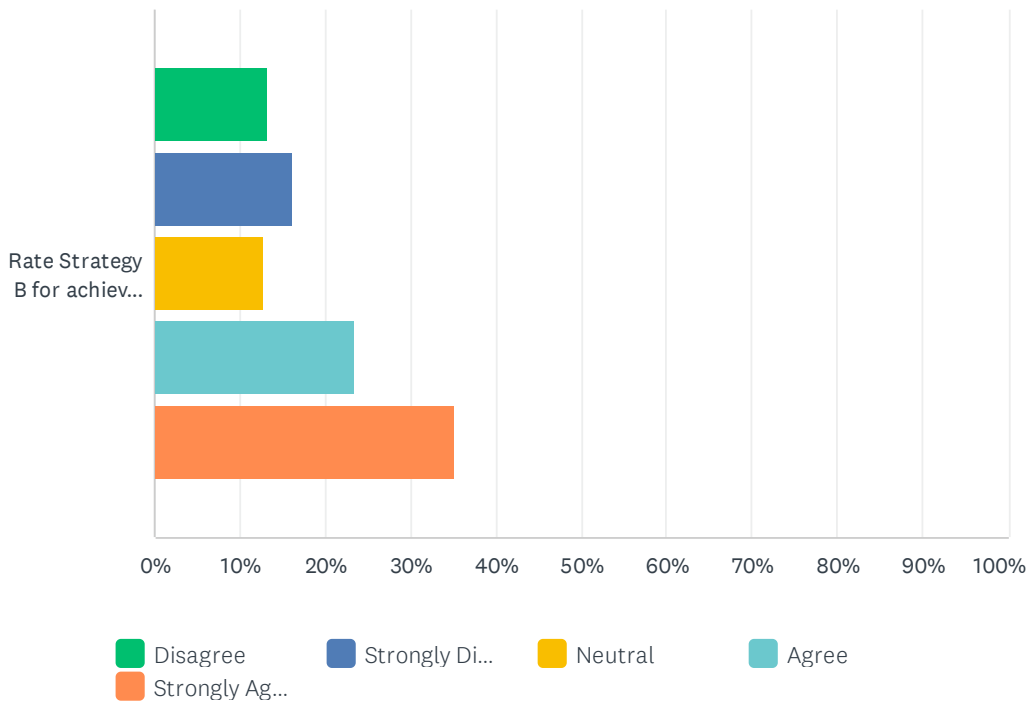
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	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy A for achieving Goal #1	12.25% 37	10.26% 31	11.59% 35	24.50% 74	43.38% 131	302

Q13 Strategy B for Goal #1: Evaluate zoning changes & incentives for building affordable housing including rezoning of vacant commercial properties into mixed-use buildings or using eminent domain or other methods to buy vacant properties to be used for housing programs.

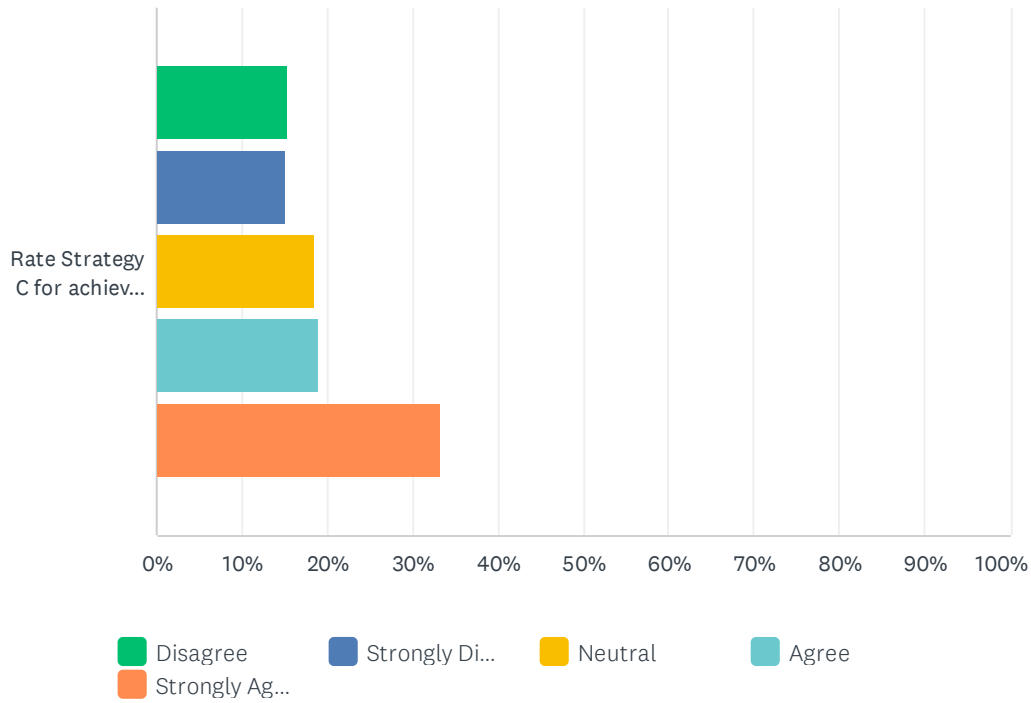
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	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy B for achieving Goal #1	13.16% 40	16.12% 49	12.83% 39	23.36% 71	35.20% 107	304

Q14 Strategy C for Goal #1: Maximize the number of households receiving long term and short term rental assistance from local, state and federal programs.

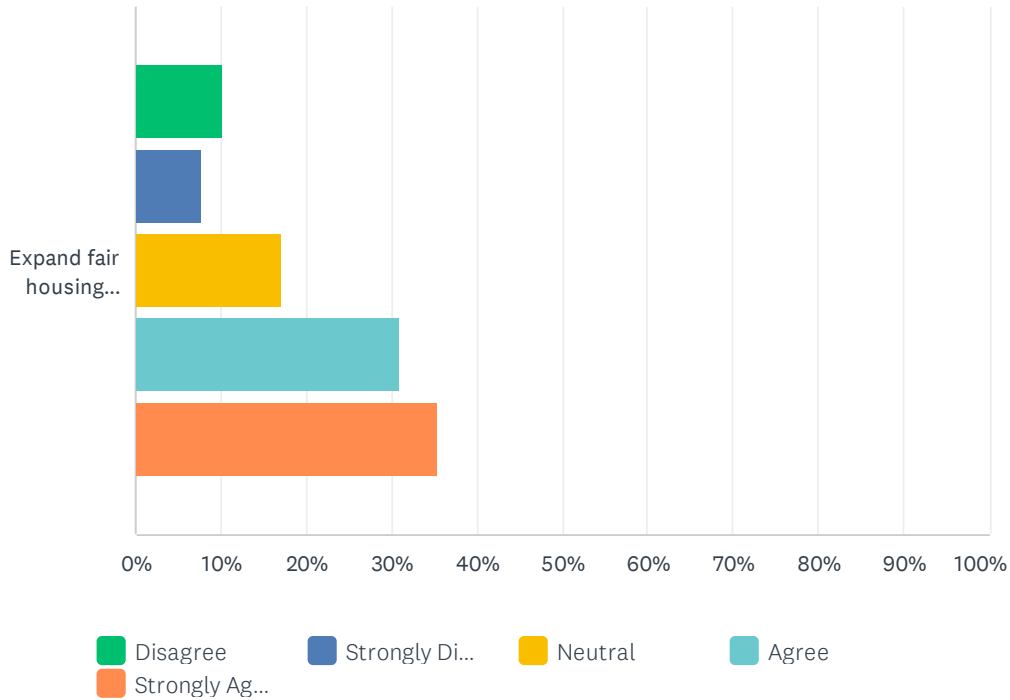
Answered: 306 Skipped: 0



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy C for achieving Goal #1	15.36% 47	15.03% 46	18.63% 57	18.95% 58	33.33% 102	306

Q15 Goal #2: Rate the following proposed Fair Housing Goal and include any feedback below.

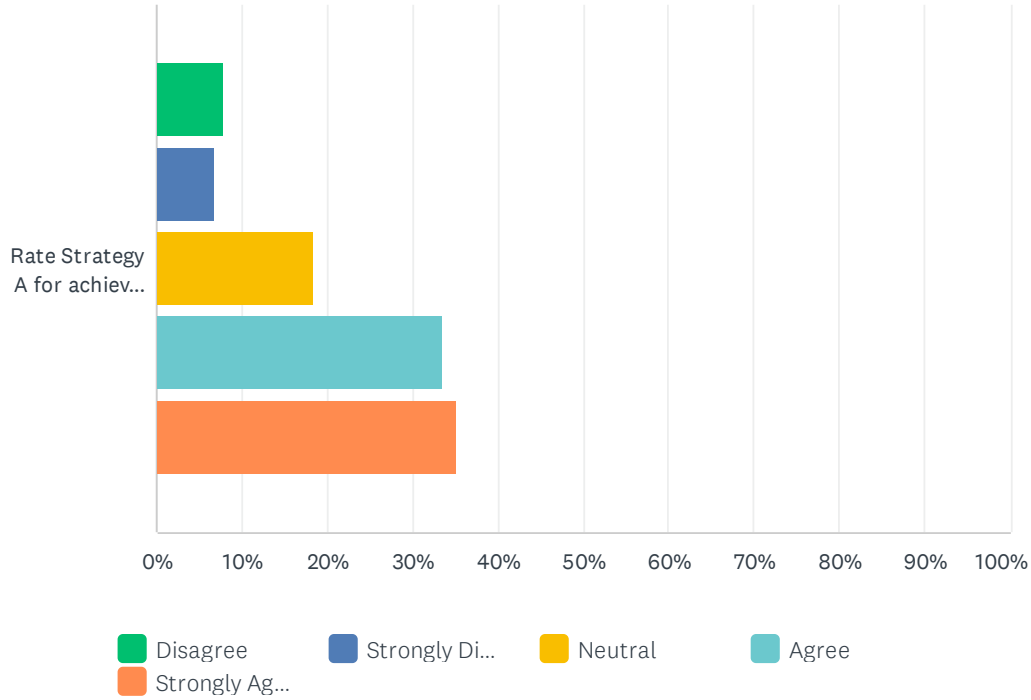
Answered: 303 Skipped: 3



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Expand fair housing outreach, education, and enforcement in Clackamas County	10.23% 31	7.59% 23	17.16% 52	31.02% 94	35.31% 107	303

Q16 Rate Strategy A for Goal #2: Increase fair housing education for staff, landlords & community partners.

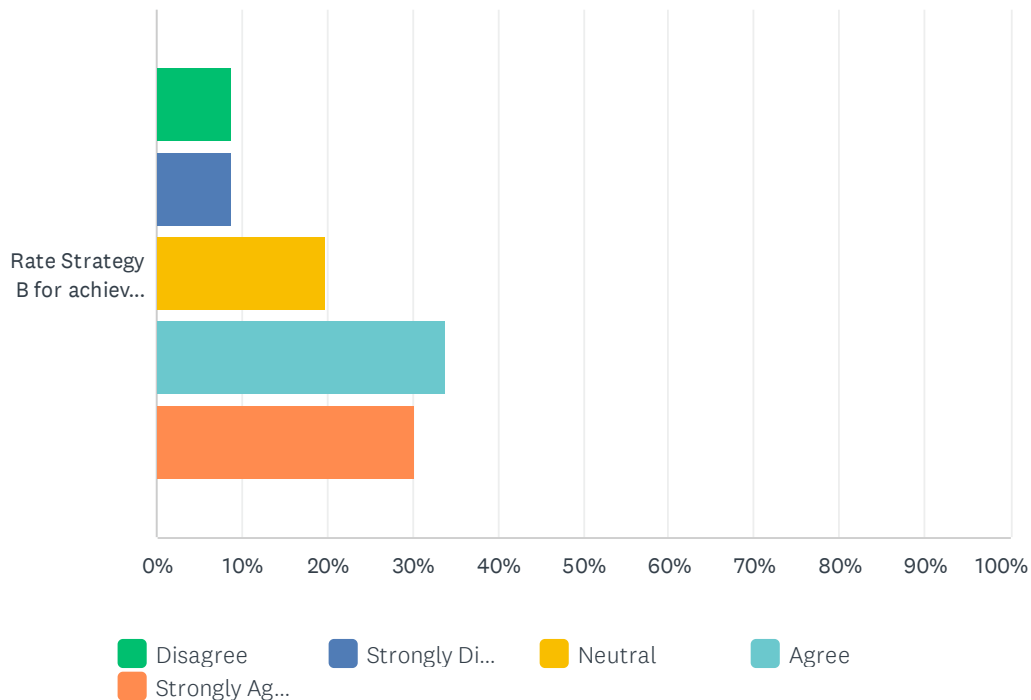
Answered: 305 Skipped: 1



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy A for achieving Goal #2	7.87% 24	6.89% 21	18.36% 56	33.44% 102	35.08% 107	305

Q17 Rate Strategy B for Goal #2: Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions.

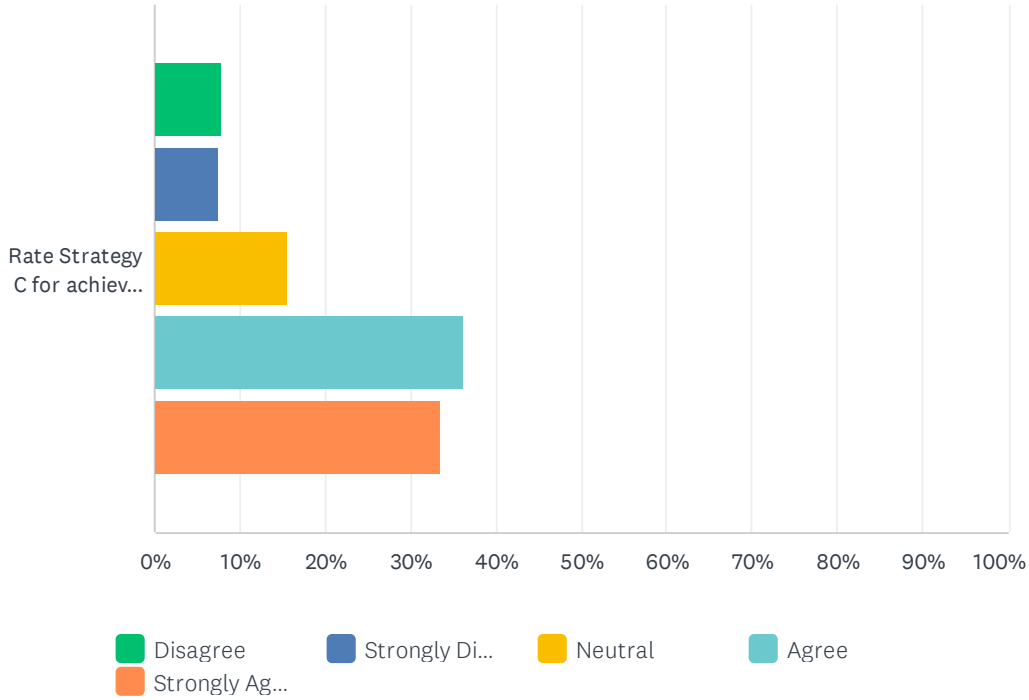
Answered: 301 Skipped: 5



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy B for achieving Goal #2	8.64% 26	8.64% 26	19.93% 60	33.89% 102	30.23% 91	301

Q18 Rate Strategy C for Goal #2: Work in collaboration with partners to enforce fair housing law.

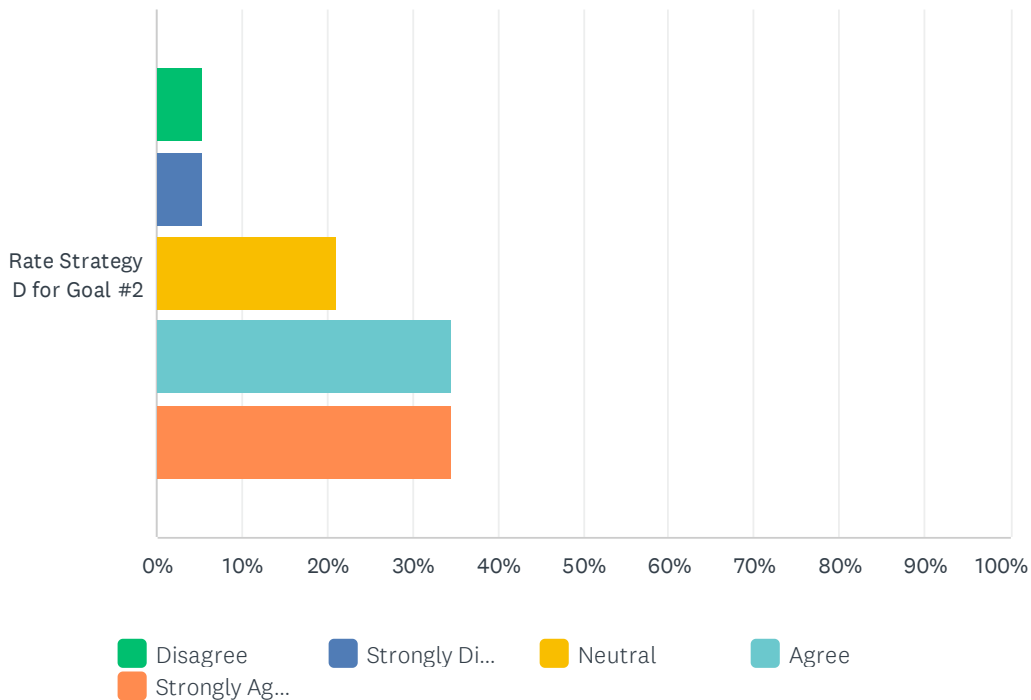
Answered: 304 Skipped: 2



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy C for achieving Goal #2	7.89% 24	7.57% 23	15.46% 47	36.18% 110	33.55% 102	304

Q19 Rate Strategy D for Goal #2: Continue operating the Housing Rights and Resources line, which is a partnership between Clackamas County Social Services, Clackamas County Community Development, Legal Aid Services of Oregon, and Fair Housing Council of Oregon to provide information about fair housing law to landlords and tenants in Clackamas County.

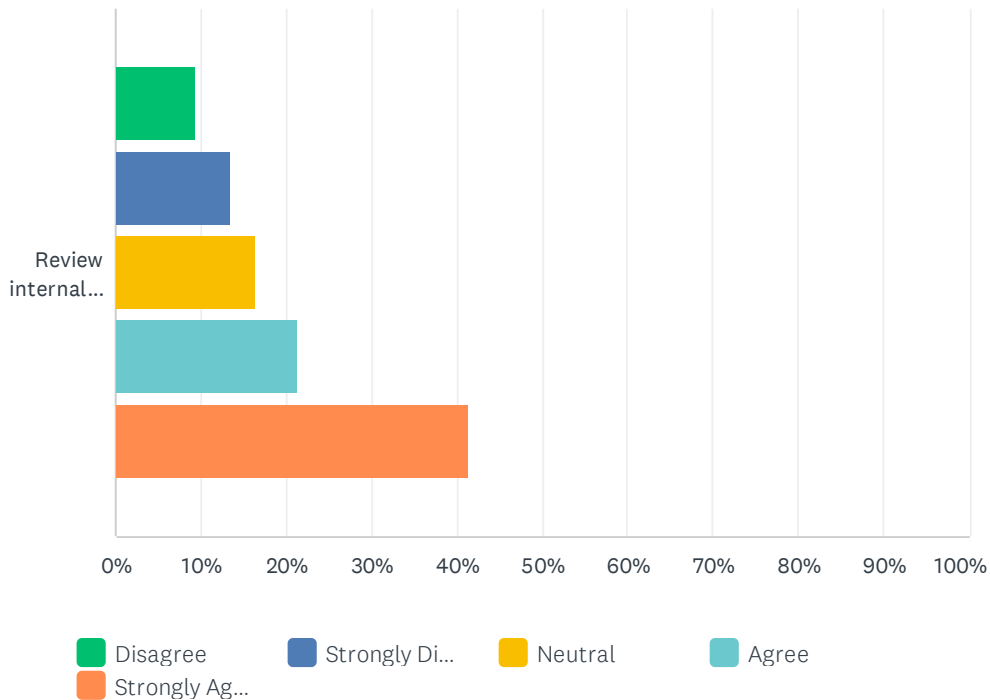
Answered: 302 Skipped: 4



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy D for Goal #2	5.30% 16	5.30% 16	21.19% 64	34.44% 104	34.44% 104	302

Q20 Goal #3 - Rate the following proposed Fair Housing Goal and include any feedback below.

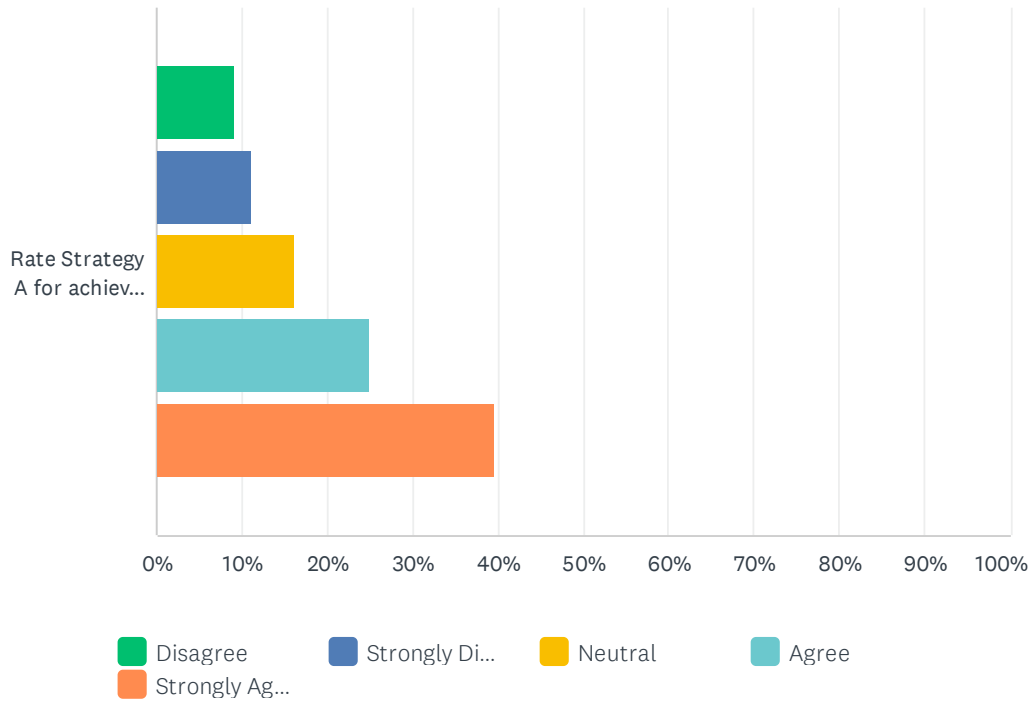
Answered: 300 Skipped: 6



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Review internal (County) policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.	9.33% 28	13.33% 40	16.33% 49	21.33% 64	41.33% 124	300

Q21 Rate Strategy A for Goal #3: Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.

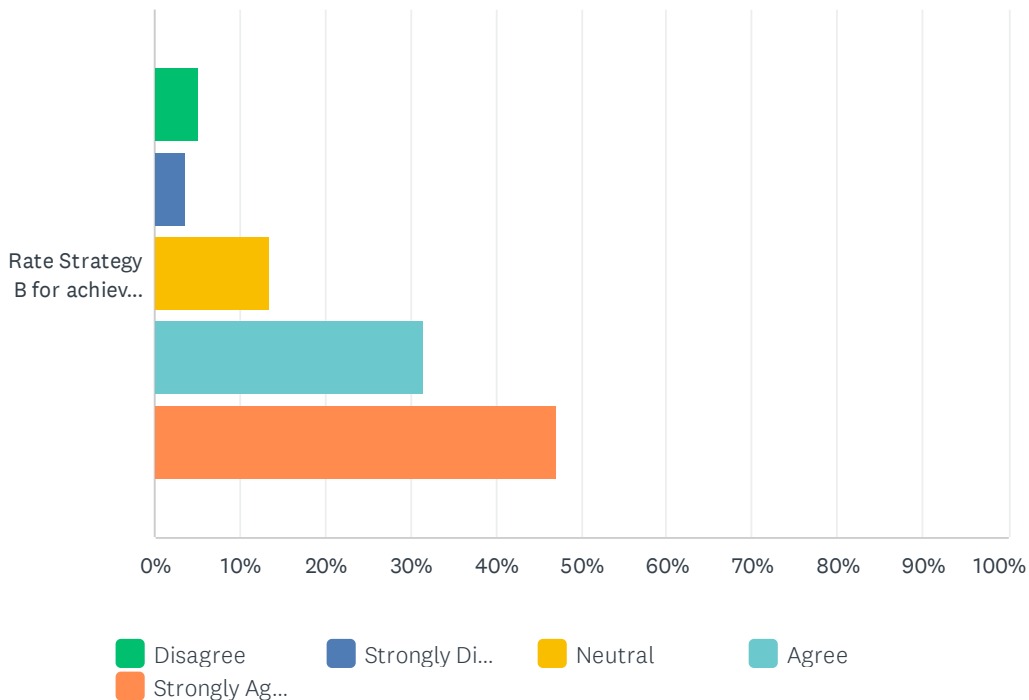
Answered: 297 Skipped: 9



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy A for achieving Goal #3	9.09% 27	11.11% 33	16.16% 48	24.92% 74	39.73% 118	297

Q22 Strategy B for Goal #3: Provide multiple ways for County residents to access services and information. Email, phone, text, in-person, etc. Ensure that outgoing messages are available in multiple languages and all staff have access to interpretation services quickly and efficiently.

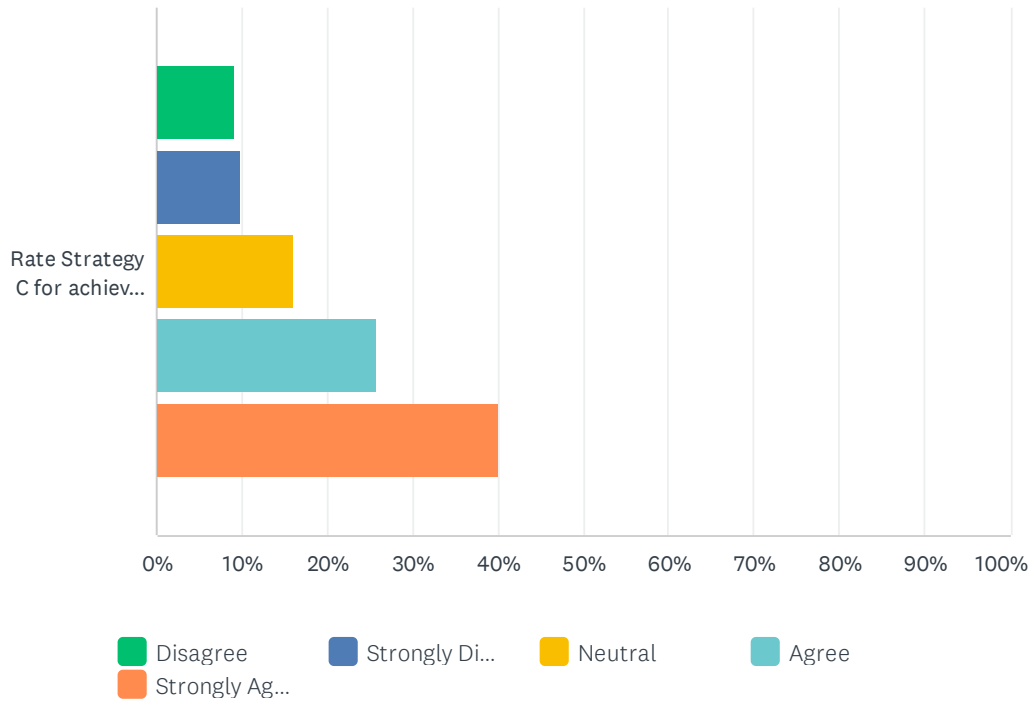
Answered: 297 Skipped: 9



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy B for achieving Goal #3	5.05% 15	3.70% 11	13.47% 40	31.65% 94	47.14% 140	297

Q23 Rate Strategy C for Goal #3: Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.

Answered: 294 Skipped: 12



	DISAGREE	STRONGLY DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE	TOTAL RESPONDENTS
Rate Strategy C for achieving Goal #3	9.18% 27	9.86% 29	15.99% 47	25.85% 76	40.14% 118	294

Q24 Any other thoughts to incorporate into the Fair Housing goals?

Answered: 93 Skipped: 213

Q25 If you would like to be contacted regarding the survey, please provide your name and the best way to contact you?

Answered: 51 Skipped: 255

ANSWER CHOICES	RESPONSES	
Name	94.12%	48
Company	0.00%	0
Address	0.00%	0
Address 2	0.00%	0
City/Town	100.00%	51
State/Province	0.00%	0
ZIP/Postal Code	0.00%	0
Country	0.00%	0
Email Address	98.04%	50
Phone Number	0.00%	0

LIST OF EMAILED PUBLIC COMMENTS ON AFH

1/31/2022

Hey Mark 🙌

I live in OC and was made aware the SDCs for ADUs are sky high. I understand our infrastructure is old but it's creating barriers. Maybe the affordable housing bond could subsidize some fees?

Just some thoughts.

Dirk Schlagenhauser

Oregon City

1/31/2022

I received an email regarding the housing action plan and assessment because I am a survey respondent. The email referenced this email for comment/question.

In reading the action plan, and understanding that the plan is still being reviewed/drafted, I'm interested in knowing which parts will be updated. Specifically the income levels and population levels of Clackamas County, it's cities, and the region as a whole.

As well, will the below issue be addressed as it was noted to be an issue in the last assessment and is most definitely a worsening issue now?

B.i.1.f - Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future:

"...Increasing cost of housing in the Portland metropolitan area will continue to make it difficult for low-income persons to purchase homes in the jurisdiction and the region. Low-income persons may be limited to living in rental properties and limited to living in multi-family housing unless more areas of the county jurisdiction are re-zoned to allow for more high density residential units and other types of housing...."

I would argue that it is difficult for even median income and upper income residents to find affordable housing. Rent is an issue for even median income residents now as well. I would like to know how this plan may address some of the problems I'm seeing as a life-long resident of Clackamas County.

As a respondent I would also like to add that one trend I'm seeing and hearing is the increase in number of homes individuals hold as investment properties. An individual with 10 homes in this area is not unheard of and from my rough estimate as a Nurse working with many, many members of the community (as well as many that live outside of this community/region/state that also own investment properties here) I'm guessing that this is a contributing factor to our current housing crisis. I would live for this to be evaluated in this plan period, or the next. I feel, and others do as well, that housing should not be a for profit industry unless you're selling. There is a feeling that we are being forced into renting when that is not our desire, and with that, being forced out of our community if we insist on buying.

If you're not the person to send this email to I would appreciate a referral to a proper post.

Thank you for your time,

APPENDIX C

Joe Gorecki

April 12, 2022

Board of County Commissioners
Clackamas County

Members of the Board:

Approval of the Proposed 2022-2027 Assessment of Fair Housing Plan Funded through U.S.
Department of Housing & Urban Development
No County General Funds are involved

Purpose/Outcomes	Approval of the proposed 2022 – 2027 Assessment of Fair Housing plan.
Dollar Amount and Fiscal Impact	300 hours of staff time to prepare and submit plan to HUD.
Funding Source	U.S. Department of Housing and Urban Development No County General Funds are involved.
Duration	Effective July 1, 2022 and terminates on June 30, 2027
Previous Board Action	The last 5 year fair housing plan was approved by the Board on October 13, 2016. Issues topic on 4/12/2022
Strategic Plan Alignment	H3S – Sustainable and affordable housing County - Ensure safe, healthy and secure communities.
Contact Person	Mark Sirois, Community Development Manager 503-351-7240
Contract No.	N/A

BACKGROUND:

As a recipient of Federal Community Development Block Grant, HOME investment Partnerships Program, and Emergency Solutions Grant funds from the U.S. Department of Housing and Urban Development (HUD) the County is required to comply with Federal Fair Housing Regulations. The Community Development Division (CDD) and the Housing Authority of Clackamas County (HACC) have completed the data analysis, a survey and community engagement collaboration process to develop the 2022 – 2027 Assessment of Fair Housing Plan (AFH).

The County is required by the Department of Housing and Urban Development (HUD) to submit a fair housing plan in order to continue receiving federal grant funds from HUD. The 2022-2027 Assessment of Fair Housing (AFH) Plan consists of an assessment of the past, current and future efforts to improve housing access for all protected classes in Clackamas County. The AFH Plan includes a description of the community participation process, an assessment of past goals and action, an analysis of fair housing issues, and Clackamas County's 5-year fair housing goals and strategies.

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Beginning in September 2021, a workgroup of Clackamas County Health, Housing and Human Services (H3S) housing and social services staff reviewed previous Fair Housing Goals and accomplishments. H3S staff also considered results from the following recently completed plans and studies:

- Clackamas County Metro Bond Local Implementation Plan
- 2021 County DTD Expanding Housing Choice Survey
- 2019 Homelessness and Housing Affordability
- Performance Clackamas Managing for Results
- 2018 State of Oregon Fair Housing Report
- 2018 County Housing Needs Assessment
- 2021 Coalition of Communities of Color Community Engagement Report

Based on the information in these housing surveys and reports, historical data and feedback from the County's Housing Rights and Resources Program, a draft set of goals and strategies were developed as a starting point for community consideration and discussion.

Report Summary

The process of analysis to select the 2022-2027 AFH Goals for the jurisdiction was a series of meetings and discussions by the work group. The workgroup also developed a community survey which was distributed in 3 languages. 306 persons responded to the proposed goals and strategies listed in the survey.

- Low-income people living in affordable housing projects indicated that they felt their housing choices were limited because there was no other affordable housing available.
- People with disabilities also felt that their housing choices were limited because no other affordable accessible housing was available.
- Many people living in low-income housing or low rent housing did not want to file any complaints about maintenance because they were afraid of being evicted for complaining.

The AFH has the following goals in priority order:

- 1: Increase and preserve affordable, accessible housing options throughout Clackamas County.
- 2: Expand fair housing outreach, education, and enforcement.
- 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.

These AFH Goals apply to 3 Clackamas County Divisions: Housing Authority of Clackamas County, Community Development Division and the Social Services Division. Approval of the AFH plan is required before HUD will release any of the federal funds coming to CDD and HACC.

The proposed AFH Plan was announced and made available to the public for review and comment for 45 days from February 3 and until Monday, March 21, 2022. All comments have been accepted and included in the plan.

RECOMMENDATION:

Staff recommends that the Board of County Commissioners take the following actions:

- 1) Place approval of the 2022 – 2027 Assessment of Fair Housing (AFH) Plan on the Board of County Commissioners' consent agenda for adoption at a BCC Business meeting.
- 2) Authorize staff to submit the AFH Plan to HUD.

Respectfully submitted,

Rodney A. Cook

Rodney A. Cook, Director

Attachments:

- Proposed 2022-2027 AFH Executive Summary
- Proposed 2022-2027 Assessment of Fair Housing Plan