

June 23, 2022

Board of Commissioners
Clackamas County

Members of the Board:

Approval of the Final 2022-2026 Community Development Consolidated Plan

Purpose/Outcomes	Approval of the 2022-2026 Consolidated Plan
Dollar Amount and Fiscal Impact	Submission of Consolidated Plan is required for Clackamas County to receive annual HUD grant funding.
Funding Source	U.S. Department of Housing and Urban Development (HUD) grant funds. No County General Funds are involved.
Safety Impact	N/A
Duration	Effective July 1, 2022 and terminates on June 30, 2027.
Previous Board Action	A Public Hearing with a review of the past performance of the Community Development program, proposed Consolidated Plan, proposed Action Plan, and public testimony on the County's housing and community development needs was held on April 7, 2022. BCC Policy session on June 14.
Strategic Plan Alignment	<ol style="list-style-type: none"> 1. Ensure safe, healthy and secure communities. 2. Build a strong infrastructure
Contact Person	Mark Sirois, Community Development Manager - (503) 351-7240
Contract No.	NA

BACKGROUND:

The 2022-2026 Consolidated Plan is a 5-year planning document required by HUD to qualify Clackamas County to receive annual HUD grant funding including: the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME) and the Emergency Solutions Grant (ESG).

In addition to the 2 community meetings in October and November of 2021 and the April 7, 2022 public hearing, the Consolidated and Annual Action Plans were posted and available for public comment beginning March 16th until Monday April 11th. No changes to the Plan were required due to comments received. All public comments were accepted and added to the Plan.

On Tuesday, May 17th, HUD announced annual allocations for the CDBG, HOME and ESG programs for all of the United States including Clackamas County.

RECOMMENDATION:

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

- 1) Place the Final 2022-2026 Consolidated Plan on the consent agenda for approval and submittal to HUD.

Thank you.

Rodney Cook,
Director

Attachments:

- Final 2022-2026 Consolidated Plan

CLACKAMAS COUNTY

HEALTH, HOUSING AND HUMAN SERVICES
DEPARTMENT

COMMUNITY DEVELOPMENT DIVISION

2022-2026 CONSOLIDATED PLAN



Clackamas County
Community Development Division
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JUNE 2022

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Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Clackamas County Community Development is a division within the larger Clackamas County Health, Housing and Human Services Department that includes the Behavioral Health, Public Health, Health Centers, Social Services, the (public) Housing Authority of Clackamas County and, Children Youth and Families divisions.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Clackamas County was facing a homeless and affordable housing crisis before the COVID Pandemic. The nationwide economic downturn, labor shortages and supply chain disruptions have dramatically increased the complexity and the number of people who are not able to secure safe, decent housing.

In response to the ongoing housing crisis, Clackamas County has created an Administrator Housing Task Force to pull multiple departments with different expertise to one table to problem solve, analyze and make recommendations to the Board of County Commissioners. The task force is made up of representatives from Health, Housing and Human Services (H3S), Counsel, Public and Government Affairs (PGA), Finance and County Administration. Housing is a big multifaceted topic. Staff will bring forward a series of policy sessions to help the BCC inform a comprehensive county housing portfolio.

Strategic Plan Priorities

1. Affordable Housing
2. Homelessness
3. Non-housing Community Development

Strategic Plan Goals and Objectives (over 5 years)

1. Affordable Housing – 300 units
2. Housing Rehabilitation – 150 Households
3. Public Services – 1500 persons
4. Homeless assistance – 500 persons
5. Public Facilities – 5,000 Persons
6. Community Infrastructure – 5,000 persons

3. Evaluation of past performance

Clackamas County Housing and Community Development has been a major partner and funder of many affordable housing projects and most of the senior centers throughout the county over the last 20 years. The impact of projects and services supported with grant funds is often limited by the federal grant

regulations and the actual annual funding levels although communities and non-profit partners do bring private resources to leverage the federal funds. Clackamas County Housing and Community Development Division continues to expend federal funds efficiently and effectively within the bounds of federal regulations. Slow moving projects are cancelled allowing funds to be reallocated to projects that are on track to be completed as scheduled.

Clackamas County coordinates with and provides staff support to the homeless Continuum of Care.

Clackamas County has recently completed an Assessment of Fair Housing and established the following goals for program years 2022 to 2026:

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.

4. Summary of citizen participation process and consultation process

Clackamas County Community Development Division maintains a Community Participation list of persons interested in programs and services funded by federal grants. Public meeting notices are published in community newspapers and notices of funding availability are distributed throughout the county through newspapers and email lists.

Two (2) online Public meetings were held on October 27 and November 16, 2021 to gather public comments on housing and community development needs. Public Comments were in favor of proposed projects and requested additional affordable housing options throughout the county. Public comments included inquiries into the timeline for next funding cycle, proposed projects and services and the CDBG, HOME and ESG application process.

For the Assessment of Fair Housing Goals, a total of 306 people responded to a community survey, a public housing resident survey and a Spanish language survey. A public notice was published in community newspapers on February 3, 2022 notifying interested persons that a draft of the AFH document, AFH Goals and an executive summary was posted for a 45-day comment period ending March 21, 2022.

The Continuum of Care homeless services providers and public housing residents are engaged in annual public meetings to discuss programs, projects and services. The general public is also invited and engaged through solicitation of feedback through community online surveys and public meetings.

5. Summary of public comments

Two (2) online Public meetings were held on October 27 and November 16, 2021 to gather public comments on housing and community development needs.

Comments were in favor of proposed projects and requested additional affordable housing options throughout the county. Public comments included inquiries into the timeline for next funding cycle, proposed projects and services and the CDBG, HOME and ESG application process.

The draft 2022 Action Plan will be posted for review and comment from March 17, 2022 to April 11, 2022. Comments submitted by email suggested more homeless services and affordable housing options. The draft plan will be presented for public comments and testimony on April 7, 2022 and a final plan will be approved by the Board of County Commissioners in June 2022.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted and included in the Attachment A: Public Comments

7. Summary

Clackamas County was severely impacted this past two years by the COVID Pandemic, forest wildfires, a “heat dome” and a winter ice storm that did severe damage to power lines and the electrical power grid in Clackamas County.

Lists of interested persons on the Community Participation List and the Continuum of Care list were provided an executive summary and notified that the funding recommendations and the plans were available for review and comment. A Public Notice was published in all county newspapers on March 10, 2022 notifying the general public that the Consolidated Plan and the Action plan were available at the CD Website: <https://www.clackamas.us/communitydevelopment> for review and comment. The public comment period on the 2022-2026 Consolidated Plan and 2022 Action Plan was from March 17, 2022 to April 11, 2022 and the public hearing was held on April 7, 2022.

All comments were in support of homeless services, affordable housing projects and first time home owner programs. Comments also included a request for assistance with efforts to develop more affordable and accessible housing units as well as increased homeless services.

All comments were accepted and are included in Appendix A. The Board of County Commissioners are scheduled to review and approve the final plan in June 2022.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	CLACKAMAS COUNTY	
CDBG Administrator	CLACKAMAS COUNTY	Community Development Division
HOPWA Administrator		
HOME Administrator	CLACKAMAS COUNTY	Community Development Division
ESG Administrator	CLACKAMAS COUNTY	Community Development Division
HOPWA-C Administrator	CLACKAMAS COUNTY	Community Development Division

Table 1 – Responsible Agencies

Narrative

Clackamas County Community Development is a division within the larger Clackamas County Health, Housing and Human Services Department that includes the Behavioral Health, Public Health, Health Centers, Social Services, the (public) Housing Authority and, Children Youth and Families divisions. Clackamas County receives no HOPWA funds. Services for persons with AIDS are provided by the nearby City of Portland, Oregon.

Consolidated Plan Public Contact Information

Clackamas County Community Development Website:
<http://www.clackamas.us/communitydevelopment/>

Clackamas County Community Development website includes maps of low/mod income areas, funding policies, meeting notices, meeting schedules, Consolidated Plans, annual Action Plans, information on HOME repairs grants and loans, and other programs.

Staff Contacts:

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Mark Sirois, Community Development Manager: marksir@clackamas.us

Steve Kelly, Project Coordinator: stevekel@clackamas.us

Amy Council, Project Coordinator: acouncil@clackamas.us

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

Clackamas County is an urban and rural county within the Portland/Vancouver metropolitan statistical area. Clackamas County is currently reaching out to non-profit agencies that provide services to vulnerable and underrepresented populations to expand agency capacity to provide more services in the county, particularly in rural areas. Clackamas County provides federal funding to non-profit housing developers to build, purchase and maintain assisted housing throughout the county. The County Health, Housing and Human Services Department currently provides the bulk of the social services, assisted housing services and public housing to low-income residents in the county.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

Clackamas County Community Development Division (CDD) coordinates activities between public housing and assisted housing agencies through funding and reporting outcomes to state and federal agencies. The local public housing authority is a part of Clackamas County's Health, Housing and Human Services Department. Nonprofit and for profit housing developers and housing providers are in regular contact with CDD staff about project ideas and potential state and federal grants that could be combined with CDBG and HOME funds for a successful housing project proposal. The HOME program provides vital funding to affordable housing providers that also apply for state tax credit funding as one of few sources of funds available to develop affordable housing units in the rural parts of Clackamas County.

New local tax Metro Bond revenues has greatly expanded the funds and services for affordable housing and homeless services in urban areas and has also provided capacity building support to non-profit service providers.

The Clackamas County Health, Housing and Human Services (H3S) Department includes; a public housing authority, a community development division, a public health division, a social services division, a behavioral health division and a primary care division. H3S is often a convener of agencies to apply for funding, build facilities and provide services to vulnerable populations. In some cases, the county provides the services, and in other cases, non-profit agencies provide the housing or services. CDBG funds also provide support for the Housing Rights and Resources program, an H3S program in the Social Services Division. This program provides housing referral and information on all available housing services and resources to residents in need of affordable housing and related services.

CDD consults directly with the county primary care health facilities and health services to coordinate services and projects.

CDD consults directly with local governments (15 cities and towns in Clackamas County) regarding public facilities and infrastructure projects. Adjacent governments including City of Portland, Multnomah County and Washington County are contacted regularly regarding public meetings however due to scheduling conflicts staff from these governments rarely attend our public meetings.

Currently CDD has business and civic leaders engaged in the community and housing development needs assessment through their activities on non-profit boards, planning councils and commissions. Some non-profit agencies are considered civic organizations. CDD will continue to reach out to community groups that include civic and business leaders in the community.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

H3S Community Development Division (CDD) personnel administer the Continuum of Care (CoC) annual renewal application process and the Homeless Management Information System (HMIS). The same CDD office uses CDBG, ESG, and CoC funds to support homeless services and for the Homeless Point in Time (PIT) count of homeless persons. The Social Services Division coordinates the PIT count with the assistance of over community 150 volunteers.

H3S Community Development Division (CDD) personnel administer the Continuum of Care (CoC) annual renewal application process and the Homeless Management Information System (HMIS). The annual Continuum of Care renewal application funds over \$3,000,000 of services and rent assistance to homeless persons in the county. CoC efforts secure services and support for over 1,541 persons in 1,027 households including 224 chronically homeless persons as reported in the CoC 2021 System Performance report: OR 507 Stella LSA 2020-2021.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The CDD staff coordinate the Continuum of Care monthly meetings and the CoC governing board activities. The CoC policies and ESG program policies were developed with both CoC and ESG homeless services providers. The CoC reviewed and adopted the current CoC and ESG policies in February 2019.

CDD personnel also provide the HMIS training and support for CoC and ESG providers. The monthly CoC activities and quarterly performance reports are coordinated by the same Community Development Division staff that coordinates the ESG funding applications and awards process. The FY 2022-2024 ESG funding recommendations were presented to the CoC Steering Committee and to the CoC Homeless

Council (CoC) for discussion and review on March 10, 2022. CoC providers, the local public housing agency and all the agencies in the Continuum of Care are engaged in addressing the needs of homeless persons.

The CoC consults with Children, Youth and Families Community Connections, a Workforce Investment Act partner and division of H3S, to conduct employment related training for homeless persons.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Housing Authority of Clackamas County
	Agency/Group/Organization Type	PHA Services - Housing Services-Elderly Persons Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Authority is staffed by Clackamas County employees that are part of the Health, Housing and Human Services Department. The anticipated outcomes are coordinate efforts to maintain and build affordable housing units for low income residents as well as coordinated social services and employment training.
2	Agency/Group/Organization	CLACKAMAS COUNTY
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Clackamas County Social Services Division (SSD) has several programs for homeless persons and persons with disabilities. SSD provides the bulk of the social services, assisted housing services and public housing to low-income residents in the county. The County's Behavioral Health mental health services is also part of the leadership team that plans services for all Clackamas County residents including homeless and vulnerable populations.
3	Agency/Group/Organization	NORTHWEST HOUSING ALTERNATIVES
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Business Leaders Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Northwest Housing Alternatives (NHA) is an active housing and homeless services provider in the county. NHA is also an active participant in the Continuum of Care Steering Committee governing body that provides feedback on all homeless funding and services planning.
4	Agency/Group/Organization	CLACKAMAS WOMEN'S SERVICES
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services - Victims Business Leaders Civic Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Clackamas Womens Services is a prominent provider of homeless services in Clackamas County. Clackamas Womens Services has several partnerships with social services, law enforcement, and behavioral health services. Clackamas Womens Services is also a CoC and ESG services provider that participates in planning efforts of the Continuum of Care.
5	Agency/Group/Organization	Northwest Family Services
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Business Leaders Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Northwest Family Services is a provider of Shelter and Rapid Rehousing services in Clackamas County that has been part of the Continuum of Care planning process for the COVID Emergency Solutions Grant funds. Northwest Family Services is expanding their services to provide more homeless services in the county.

Identify any Agency Types not consulted and provide rationale for not consulting

NA

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Clackamas County	All Housing and Homeless Services goals are part of CoC plans and the Consolidated Plan.
Local Implementation Plan SHS Program April 2021	Clackamas County HACC	Clackamas County Metro Housing Local Implementation Plan included 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.
2019 Homelessness and Housing	Clackamas County	The 2018 Affordable Housing and Homelessness Policy Task Force was an advisory body appointed by the Clackamas County Board of County Commissioners. The Final Report made 19 recommendations divided into five categories:1. Shelter off the streets and services for the currently unsheltered2. Planning, zoning and development, 3. Housing services for those experiencing homelessness or at-risk of being homeless, 4. Tenant protections and, 5. Funding for housing and services.
Performance Clackamas MFR	Clackamas County	HOME and CDBG funded projects and activities must support the County's performance goals. Clackamas County adopted Performance Clackamas in 2014. The current plan was adopted by the Board of County Commissioners in March 2021. Performance Clackamas focuses on measurable goals encompassed by five strategic priorities: 1. Building public trust, 2. Grow a vibrant economy, 3. Build a strong infrastructure, 4. Ensure safe, healthy communities and, 5. Honor, utilize, promote and invest in our natural resources.
2018 Housing Needs Assessment	Clackamas County	All the county's housing goals for housing in unincorporated urban areas are part of this Clackamas County Regional Housing Needs Analysis for the 2019 to 2039 period. The Assessment found that elderly, disabled on low income families have very few housing options available so more housing units must be built.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2021-2025 Area Agency Aging Plan	Area Agency on Aging	Clackamas County Social Services conducted a comprehensive community needs assessment from late fall 2018 through fall 2020. In collaboration with other social service agencies, adult community centers, and Aging Services Advisory Council (ASAC) members. CCSS has identified three main goals that guided the development of each focus area: 1.Reduce barriers to accessing older adult services throughout the county, especially for populations who have lower service participation rates than expected, 2. Create and update quality assurance efforts to ensure program quality and, 3. Expand programming to meet the needs of a growing older adult population.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Clackamas County has received and reviewed the following plans in preparation of this consolidated plan:

- **The City of Portland Consolidated Plan**
- **The Metro Equitable Housing Report January 2016, 2017 and 2018**
- **Portland Consortium Consolidated Plan for 2021-2025 (City of Portland, City of Gresham and Multnomah County**

2018 State of Oregon Fair Housing Report.

Narrative (optional):

Clackamas County is part of the Portland/Vancouver Metropolitan Statistical area which is currently grappling with an affordable housing crisis as well as a rapidly increasing homeless population. In January 2022, the city of Portland in response to thousands of homeless campsites, announced the plan to open six "Safe Camping" site locations, just across the northern Clackamas County line. so far 2 have been opened to provide services and sleeping shelters.

The COVID pandemic funding and services have swamped our county with programs and services. The Metro Housing Bond for affordable housing and homeless services is also overlaying many of our housing and homeless services.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Community Development Division held a public meeting on October 27, 2021 before the CDBG Notice of Funding Opportunities (NOFO) was released and another after the NOFO was released on Nov 16, 2021. The public meetings and the NOFO were also published in all county newspapers. The meeting notices and the NOFO links were distributed through several email lists including the Continuum of Care members list, the Community Participation list, and the County social media feeds to increase public outreach. During the development of the Assessment of Fair Housing (AFH), all public housing residents and households the get Housing Choice Vouchers were contacted directly to request their participation in the survey.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	October 27, 2021. 16 people attended others emailed to ask for any handouts.	Attendees asked about the types of projects funded and the range of grant amounts. Attendees provided feedback on types of services and housing that is lacking in Clackamas County.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	November 26 public meeting. 6 people attended	Attendees asked about the types of projects funded, how to apply for funds and the range of grant amounts. Attendees provided feedback on types of services and housing that is lacking in Clackamas County.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish and Slavic</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Fair Housing Survey open from November 15, 2021 to January 15, 2022 with 306 responses. Survey was also posted on County social media feeds.</p>	<p>A community survey which was distributed in 3 languages. 306 persons responded to the proposed goals and strategies listed in the survey.</p>	<p>All comments were accepted</p>	

4	Community Survey Housing Choice	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	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.	Survey respondents were in favor of 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.	All comments were accepted	https://www.clackamas.us/planning/hb2001
5	Internet Outreach	Minorities	Housing Authority	The Plan identified	All comments were accepted.	https://www.clackamas.us/metrohousing#communityengagementactivities

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			Local Housing Services Implementation Plan. 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.	3,206 Clackamas County households needing housing and housing services to reduce and prevent homelessness.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Hearing	Non-targeted/broad community	April 7, 2022 Public Meeting	3 letters of support were submitted. All letters were supportive of the Community Development Program in Clackamas County.	NA	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

In Clackamas County and other counties and cities across the nation, the COVID pandemic has been creating massive job losses and dramatically increased homelessness. Clackamas County has created an Administrator Housing Task Force to pull multiple departments with different expertise to one table to problem solve, analyze and make recommendations to the Board of County Commissioners. The task force is made up of representatives from Health, Housing and Human Services (H3S), County Counsel, Public and Government Affairs (PGA), Finance and County Administration. Housing is a big multifaceted topic. Staff will bring forward a series of policy sessions to help the BCC inform a comprehensive county housing portfolio. There are several ongoing discussions about needs and responses including but not limited to:

- Transitional shelter options like car camping, village models and/or safe rest areas.
- How to implement Oregon Law HB 2006. Legislation which requires the county to allow an emergency shelter on land inside an urban growth boundary, as well as in rural residential zoned area outside the urban growth boundary. As long as the standards in the bill are met, typical land use regulations do not apply.
- A discussion about Oregon Law HB 3261. Legislation that requires the county (and other local governments) to allow a lawfully established hotel or motel inside an urban growth boundary to be converted to an emergency shelter or affordable housing. As long as the standards in the bill are met, typical land use regulations do not apply.

The County's Coordinated Housing Access (CHA) system was created to allow people experiencing a housing crisis to access all available homelessness prevention and housing programs through a single point of contact. The CHA system provides the best measure of the needs of our unhoused neighbors.

The Combined CHA Data Indicates the Following Trends:

- There are significantly more Adult Only Households who are unsheltered. However, the current inventory has little capacity for Adult Only Households.
- There was a dramatic increase in need specifically for the Youth Households under 25, which could be attributed to increased outreach services for youth.
- There was a significant decrease in unsheltered Veterans, which could be attributed to the availability of veteran's specific resources. Please note that those in the Veterans Village remain on the CHA

waitlist.

- The population within the UGB in need of services is over five (5) times greater than the population outside of the UGB. The top five (5) communities reported outside the UGB include: Molalla (25), Canby (24), Sandy (19), Estacada (10) and Boring (10).

This data shows there is a need for additional shelter in Clackamas County. Clackamas County has been using a hotel/motel shelter model in which the rooms were rented. Other counties such as Lane, Multnomah, and Washington have also been using a hotel/motel shelter model but with properties that were purchased and owned through Project Turnkey state funding.

Homeless Shelter and Transitional Housing projects are Public Facilities that are in high demand in urban areas as well as rural areas.

Public Improvements to improve pedestrian and bikeway safety are also in high demand as communities look for alternative transportation and increased accessibility for elderly and disabled persons particularly around new housing developments.

Public Services that provide homeless persons, elderly and disabled persons with housing security, employment training, affordable housing access, and basic needs like food and shelter continue to be in high demand as well.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

In Clackamas County and other counties and cities across the nation, the COVID pandemic has been creating massive job losses and dramatically increased homelessness.

From the County's Comprehensive (land use) Plan, Chapter 6: Housing

Meeting the future housing needs and desires of residents will require a variety of housing types and densities. For example, the desire for home ownership can be partially met with manufactured dwellings and condominiums in large or small complexes or owner-occupied duplexes. A range of housing prices can be encouraged by providing a greater variety of lot sizes for single-family housing. More multifamily dwellings and other alternative housing forms are needed to house the young, the elderly, and lower-income households which are priced out of the single-family housing market, or households which may prefer other than single-family homes.

ISSUES

The planning process has identified issues that address affordable housing, housing choice and variety, citizen preference, density, neighborhood livability, and compatibility with mass transit. Some of these issues follow:

- The availability of shelter and housing options for houseless persons
- Affordable housing for all the County's households
- Housing for low- and moderate-income households, the elderly, and mentally or physically handicapped residents
- A variety of housing types for all income levels, including single-family dwellings, multifamily dwellings, three-family dwellings, two-family dwellings, condominiums, and manufactured dwellings
- The number and densities of single-family, two-family, three-family, and multifamily dwelling units and manufactured dwellings
- Locations of multifamily housing in relation to services, employment, transportation, and open space
- Locations of individual manufactured dwellings and manufactured home parks
- Owner-occupied and renter-occupied housing

SUMMARY OF FINDINGS AND CONCLUSIONS

- Projected population growth is expected to be slower than the County experienced in the 1970s, faster than the 1980s. From 1970 to 1978, the average annual growth rate was 3.8 percent per year, and from 1980 to 1987, it was 0.76 percent. The forecast for planning purposes is 1.6 percent per year from

1987 to 2010.

- The northwest urban area has the potential of being the most energy-efficient and cost-effective location for growth in the County.
- Since 1980, 30 percent of the new dwelling units built in the entire County have been multifamily units, including duplexes. In the northwest urban area, 4 percent of new units have been multifamily.
- It is forecast that 26 percent of the new dwelling units built in the next 20 years in the entire County, and 32 percent of the new units built in the northwest urban area, will be multifamily.
- Lack of affordable housing continues to be a problem, especially severe for households headed by the young, elderly, single parents, or disabled individuals.
- The County has a shortage of special living environments for the developmentally disabled and chronically mentally ill. A particularly pressing need as the de-institutionalization movement continues to accelerate and homes must be found in communities for previously institutionalized residents. (Note: The County social services agency does not identify a particular shortage of special housing for their elderly clients at this time (1990).
- There are few condominiums in unincorporated areas.
- The Clackamas County Coordinated Housing Access 2022 Waitlist Analysis found that 1,908 people in 1,331 households were homeless or in imminent danger of becoming homeless. 674 of the households requesting help had a person who was considered Chronically Homeless.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	380,457	403,745	6%
Households	142,066	155,130	9%
Median Income	\$62,030.00	\$72,408.00	17%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	13,790	14,889	23,851	16,629	85,980
Small Family Households	3,509	4,643	7,726	5,989	45,284
Large Family Households	758	707	1,843	1,528	7,050
Household contains at least one person 62-74 years of age	3,656	3,590	6,366	4,348	21,310
Household contains at least one person age 75 or older	2,501	3,214	3,881	1,741	6,671

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Households with one or more children 6 years old or younger	1,395	1,971	3,428	2,551	8,795

Table 6 - Total Households Table

Data 2013-2017 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	445	275	270	169	1,159	65	99	74	30	268
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	75	130	160	25	390	0	75	90	70	235
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	204	469	545	244	1,462	24	79	149	229	481
Housing cost burden greater than 50% of income (and none of the above problems)	4,803	3,055	919	128	8,905	4,044	2,657	2,457	599	9,757

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	724	2,765	4,970	1,298	9,757	817	1,927	4,053	3,478	10,275
Zero/negative Income (and none of the above problems)	427	0	0	0	427	583	0	0	0	583

Table 7 – Housing Problems Table

Data 2013-2017 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	5,543	3,934	1,904	568	11,949	4,124	2,897	2,766	919	10,706
Having none of four housing problems	1,700	3,970	8,755	5,843	20,268	1,389	4,122	10,452	9,288	25,251
Household has negative income, but none of the other housing problems	427	0	0	0	427	583	0	0	0	583

Table 8 – Housing Problems 2

Data 2013-2017 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,817	2,446	2,305	6,568	983	1,277	2,244	4,504
Large Related	460	308	254	1,022	252	194	538	984
Elderly	2,063	1,804	1,545	5,412	2,633	2,516	2,765	7,914
Other	1,763	1,963	2,159	5,885	1,015	697	1,013	2,725
Total need by income	6,103	6,521	6,263	18,887	4,883	4,684	6,560	16,127

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,587	1,103	365	3,055	864	834	738	2,436
Large Related	285	183	0	468	224	129	145	498
Elderly	1,773	1,195	539	3,507	2,041	1,385	1,176	4,602
Other	1,594	958	169	2,721	917	383	385	1,685
Total need by income	5,239	3,439	1,073	9,751	4,046	2,731	2,444	9,221

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	245	579	635	219	1,678	24	139	159	205	527
Multiple, unrelated family households	14	0	50	20	84	0	15	80	84	179

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	65	20	15	30	130	0	0	0	10	10
Total need by income	324	599	700	269	1,892	24	154	239	299	716

Table 11 – Crowding Information – 1/2

Data Source: 2013-2017 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

The Elderly are the largest group that are paying more than 50% of their income for housing: 3,507 of low-income Elderly Renters are paying more than 50% of their income for housing and 4,602 Elderly Owners are paying more than 50% for their housing.

Of all low-income households, 8,906 of Renters are paying more than 50% of their income and 9,757 of Owners are paying more than 50% of their income for housing needs.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The number of Chronically Homeless & Literally Homeless Households has increased by 18.5% since 2019.

Adult Only households number 890, an increase of 15.0%, Families with Children households has increased by 158 or 25.4% since 2019. The Total Households that are chronically houseless is now 1067, an increase of 18.5% since 2019.

The number of homeless Youth Households under 25 has increase to 35, an increase of 105.9% since 2019.

The number of older Adults Age 62+ has increase to 155, an increase of 26.0% since 2019.

The number of households that have Survivors of Domestic Violence has increased by 11.0%, a total of 313 households since 2019.

Due to more VASH vouchers, the number of veteran homeless households has decreased to 63 households, a decrease of 50.8% since 2019.

What are the most common housing problems?

The most common problem for low income renters and owners is the cost burden of paying more than 50% of household income to housing costs.

Of all low-income households, 8,906 of Renters are paying more than 50% of their income and 9,757 of Owners are paying more than 50% of their income for housing needs.

Are any populations/household types more affected than others by these problems?

Besides the elderly, the largest group impacted are the single person or small related households.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The following bed count demonstrates the existing transitional housing and shelter capacity in Clackamas County as of December 14, 2021.

Warming shelters are not operated year-round, they are activated when the weather is predicted to “feel like” 33 degrees or lower or when other conditions, such as accumulated snowfall or high winds, make sleeping outdoors especially dangerous. Each site decides by 1 PM whether they will open, based on National Weather Service predictions.

Emergency Shelters: 168 beds for households with children and 72 beds for households without children.

Domestic Violence Survivor shelter beds: 227 beds for HH with children and 63 beds for HH without children.

Transitional Housing: 33 beds for HH with children and 47 beds for HH without children.

Participants are referred to a shelter program through CHA based on a vulnerability assessment. Immediate shelter for participants is a hotel room. Participants connect with a shelter services provider

for wrap around support services. These shelter support services provide key supports for program participants and are linked to fewer calls to emergency services. Ensuring partnerships and effective communication between the shelter support service provider and law enforcement facilitates more positive interactions with local residents and businesses. For successful program outcomes and to keep program costs down, the hotel/motel program must be linked to housing navigation and case management services paired with rental assistance to move people from the shelter into permanent housing.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

In 2018, Clackamas County embarked on an ambitious look at a countywide Housing Needs Analysis (HNA). To undertake this endeavor required the collaboration and cooperation of all Clackamas County cities as well as our unincorporated communities. The study was contracted with ECONorthwest with the goal of developing an in-depth understanding of the housing needs in our county, as well as where we need to focus additional resources (monetary or partnership driven) to create opportunities and provide a lasting impact for residents that have been historically marginalized.

This study found that throughout the county, 1,175 households with income below 30% of Median Family Income need housing now. 1,166 households with income between 30 and 50% of Median Family Income need housing now. 1,666 households with income between 50 and 80% of Median Family Income need housing now. A total of 4,007 households with income between 0 and 80% of Median Family Income need housing now.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

A household that contains non-white members and low income is the most likely to be homeless. Clackamas County is now working on Advancing Racial Equity in all programs and services including housing.

Clackamas County prioritizes advancing racial equity for all its activities. Using an equity lens is an ongoing priority to mitigate decades of government policy from the federal to the local level. We know that inequitable policy contributed to disparate outcomes for communities of color who struggle disproportionately with unaffordable housing, displacement, and homelessness. The implementation of the County's Metro Affordable Housing Bond provides an opportunity to work to address this inequity and to meet the needs of historically marginalized communities.

Efforts and opportunities to address racial equity occur at many points in the implementation of the Affordable Housing Bond. Opportunities to advance racial equity include community engagement and plan development, project selection, the inclusion of minority businesses and workforce in the design

and construction of housing, the formation of culturally specific partnerships for outreach and services, accessible tenant selection/screening criteria processes, contracting opportunities post construction, and ongoing reporting of outcomes.

Discussion

The County's Coordinated Housing Access (CHA) system was created to allow people experiencing a housing crisis to access all available homelessness prevention and housing programs through a single point of contact. The CHA system provides the best measure of the needs of homeless persons in Clackamas County. We know that 1,908 people in 1,331 households were considered homeless and waiting for housing in 2021.

75% of households (998 families) reported a family member with a disability. 196 people were age 62 years or older.

Clackamas County reinitiated an Administrator Housing Task Force in January 2022. The Task Force was created to pull multiple departments with different expertise to one table to problem solve, analyze and make recommendations to the Board of County Commissioners. This iteration of the task force is made up of representatives from Health, Housing and Human Services (H3S), Counsel, Public and Government Affairs (PGA), Finance and County Administration. Housing is a big multifaceted topic. Staff will bring forward a series of policy sessions to help the BCC inform a comprehensive county housing portfolio.

The Task Force will follow up with a number of homelessness and housing discussions. Including but not limited to:

- Transitional shelter options like car camping, village models and/or safe rest areas.
- How to implement Oregon House Bill HB 2006. State legislation which requires the county to allow an emergency shelter on land inside an urban growth boundary, as well as in rural residential zoned area outside the urban growth boundary. As long as the standards in the bill are met, typical land use regulations do not apply.
- A discussion about Oregon House Bill HB 3261. Legislation that requires the county (and other local governments) to allow a lawfully established hotel or motel inside an urban growth boundary to be converted to an emergency shelter or affordable housing. As long as the standards in the bill are met, typical land use regulations do not apply.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The Clackamas County population demographics in Decennial 2020 were reported in api.census.gov tables with a total population of 421,401. 77.2% were listed as White only - a decrease of 11%, 9.6% Hispanic - an increase of 2%, 4.9% Asian alone and increase of 2% , 0.3% Pacific Islander, 1% Black or African American alone and increase of 0.24%, 0.5% Native American/Non-Hispanic and 0.5% Other/Non-Hispanic.

Disproportionate Housing needs for households in the 0-30% AMI category is that Whites are over represented by 4.5% (9170/11213), Black under represented by 0.007% (85/11213) and Hispanic under represented by 0.086% (966/11213) compared to the county general population percentages listed above. In the 30-50% AMI category the Hispanic population is under represented by over 9%. In the 50-80% AMI category, Whites are over represented by 9.2% while Hispanics are over represented by 0.04%. In the 80-100% AMI category, the Asian population is under represented by 0.04% while Hispanics at 5% (233/6262) are under represented by 4.6% compared to the county general population.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,213	1,539	1,010
White	9,170	1,454	745
Black / African American	85	10	35
Asian	373	10	105
American Indian, Alaska Native	159	10	0
Pacific Islander	4	10	0
Hispanic	966	19	110

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,507	3,397	0
White	9,535	2,851	0
Black / African American	235	70	0
Asian	315	39	0
American Indian, Alaska Native	100	40	0
Pacific Islander	35	0	0
Hispanic	933	362	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,666	10,182	0
White	11,821	8,752	0
Black / African American	54	40	0
Asian	400	220	0
American Indian, Alaska Native	59	20	0
Pacific Islander	4	10	0
Hispanic	1,049	997	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,262	10,361	0
White	5,502	8,846	0
Black / African American	34	40	0
Asian	254	344	0
American Indian, Alaska Native	34	15	0
Pacific Islander	0	4	0
Hispanic	323	939	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Disproportionate Housing Needs for populations with “one or more of four housing problems” including having a housing cost burden that is more than 30% of the household income are listed in Tables 13-16. Table 13 lists the count of households with incomes that have extremely low income (extreme poverty) are represented by household incomes that are 0-30% of Area Median Income (AMI) were 81.78% White which is 4.58% more than 77.2% of Whites in the county jurisdiction. The Hispanic population in this income level with housing problems was 8.62% of the population, which is 0.98% less than the 9.6 % of Hispanics in the county. The Black population represents 0.76% of the 0-30% AMI population which is 0.24% less than the 1% of the county population that is Black. The Asian population is 3.33%, which is 1.57% lower than the 4.9% of the county population. The Native American population with housing problems at the 0-30% AMI level is 1.42%, which is 0.92% higher than the 0.5% in the county.

30 to 50% - Disproportionate Housing Needs for populations with housing problems listed in Table 14 with incomes that are low income are represented by household incomes that are 30-50% AMI were 82.86 % White that is 5.66 % more than 77.2% of Whites in the county jurisdiction. The Hispanic population in this income level with housing problems was 8.11% of the population which is 1.49% less than the 9.6% of Hispanics in the county. The Black population represents 2.04% of the 30-50% AMI population, which is 1.04% higher than the 1% of the county population that is Black. The Asian population is 2.74%, which is 2.16% lower than the 4.9% of the county population. The American Indian population with housing problems at the 30-50% AMI level is 0.87%, which is 0.37% higher than the 0.5% in the county.

50 to 80% - Disproportionate Housing Needs for populations with housing problems listed in Table 15 with household incomes that are 50-80% AMI were 86.5% White that is 9.3% more than 77.2% of Whites in the county jurisdiction. The Hispanic population in this income level with housing problems was 7.68% of the population which is 1.92% lower than the 9.6% of Hispanics in the county. The Black population represents 0.4% of the 50-80% AMI population, which is 0.6% lower than the 1% of the county population that is Black. The Asian population is 2.93%, which is 1.97% lower than the 4.9% of the county population. The Native American population with housing problems at the 50-80% AMI level is 0.43%, which is 0.07% lower than the 0.5% in the county.

80-100% - Disproportionate Housing Needs for populations with housing problems listed in Table 16 with household incomes that are 80-100% AMI were 87.86% White, which is 10.86% more than 77.2% of Whites in the county jurisdiction. The Hispanic population in this income level with housing problems was 5.16% of the population which is 4.44% lower than the 9.6% of Hispanics in the county. The Black population represents 0.54% of the 80-100% AMI population which is 0.46% less than the 1% of the county population that is Black. The Asian population is 4.06%, which is 0.84% less than the 4.9% of the county population. The Native American population with housing problems at the 80-100% AMI level is 0.54%, which is 0.04% higher than the 0.5% in the county.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This HUD Comprehensive Housing Affordability Strategy (CHAS) table displays housing Severe Housing problems for households earning less than 30% of Area Medians Income (AMI), 30-50% of AMI, 50-80% of AMI and 80-100%. The Clackamas County general population racial and ethnic demographics in 2020 were reported in HUD CHAS tables as 77.2% White, 9.6% Hispanic, 4.9% Asian, 1.0% Black, 0.5% Native American/Non-Hispanic and 0.05% Other/Non-Hispanic.

Severe Housing Problems in Clackamas County data in the tables 17-20 below suggests that the White population has a higher percentage of Severe Housing Problems at 81.87%, which is 4.67% more than 77.2% of the county population, than other racial and ethnic groups. The next largest ethnic group is the Hispanic population that appears to have a lower rate of Severe Housing Problems 8.08%, which is 1.52% less than the Hispanic population of 9.6%. However this measure may be a function of who responded to the data collection surveys at a higher rate. The Hispanic population has increased at a higher rate since 2020 in the jurisdiction as well.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,667	3,089	1,010
White	7,914	2,728	745
Black / African American	85	10	35
Asian	353	29	105
American Indian, Alaska Native	144	25	0
Pacific Islander	4	10	0
Hispanic	781	209	110

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,831	8,092	0
White	5,504	6,866	0
Black / African American	235	70	0
Asian	220	134	0
American Indian, Alaska Native	50	90	0
Pacific Islander	35	0	0
Hispanic	564	716	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,670	19,207	0
White	3,915	16,687	0
Black / African American	15	79	0
Asian	190	435	0
American Indian, Alaska Native	10	69	0
Pacific Islander	0	14	0
Hispanic	444	1,608	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,487	15,131	0
White	1,189	13,166	0
Black / African American	4	70	0
Asian	95	504	0
American Indian, Alaska Native	4	45	0
Pacific Islander	0	4	0
Hispanic	159	1,104	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

Per HUD guidance: “A disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% points or more) than the income level as a whole.”

Table 17 lists the number of renter and owner households with Severe Housing Problems based on their household incomes in comparison the Area Median Income (AMI) for 2020. The 9667 total number of 0-30% AMI household with Severe Housing Problems were 81.87% White which is 4.67% more than 77.2% of Whites in the county jurisdiction. The Hispanic population was 8.08% of the population, which is 1.52% lower than the 9.6% of Hispanics in the county. The Black population represents 0.88% of the Severe Housing Problems, which is 0.12% lower than the 1% of the county population that is Black. The Asian population with Severe Housing Problems is 3.65%, which is 1.25% lower than the 4.9% of the county population. The Native American population at the Severe Housing Problems level is 0.36%, which is 0.26% lower than the 0.62% in the county.

30-50% of AMI Households with Severe Housing Problems- Table 18 lists the number of renter and owner households with Severe Housing Problems at 30-50% of their household incomes. A total of 6,831 households were Severe Housing Problems. Of which 80.57% was White, which is 3.37 % more than 77.2% of Whites in the county jurisdiction. The Hispanic population with Severe Housing Problems in this level was 8.26% of the population, which is 1.34% lower than the 9.6% of Hispanics in the county.

The Black population represents 3.44% of the Severe Housing Problems at this AMI level which is 2.44% higher than the 1% of the county population that is Black. The Asian population at this AMI level with Severe Housing Problems is 3.22%, which is 1.68% lower than the 4.9% of the county population. The Native American population at this AMI level with Severe Housing Problems is 0.73%, which is 0.23% higher than the 0.5% in the county.

50-80% AMI with Severe Housing Problems - Table 19 lists the number of renter and owner households in Clackamas County with severe housing problems. A total of 4,670 households were at the severe cost burdened level. Of which 83.83% were White, which is 6.63% more than 77.2% of Whites in the county jurisdiction. The Hispanic population Severe Housing Problems in this level was 9.51% of the population, which is 0.09% lower than the 9.6% of Hispanics in the county. The Black population represents 0.32% of the Severe Housing Problems at this AMI level, which is 0.68% lower than the 1% of the county population that is Black. The Asian population at this AMI level with Severe Housing Problems is 4.07% which is 0.83% lower than the 4.9% of the county population. The Native American population at this AMI level with Severe Housing Problems is 0.21%, which is 0.29% lower than the 0.5% in the county.

80-100% AMI with Severe Housing Problems - Table 20 lists the number of renter and owner households in Clackamas County with severe housing problems. A total of 1,487 households were at the severe housing problems. Of these Severe Housing Problems households, 79.96% were White, which is 2.76% more than 77.2% of Whites in the county jurisdiction. The Hispanic population Severe Housing Problems in this level was 10.69% of the population, which is 1.09% higher than the 9.6% of Hispanics in the county. The Black population represents 0.27% of the Severe Housing Problems at this AMI level, which is 0.73% lower than the 1% of the county population that is Black. The Asian population at this AMI level with Severe Housing Problems is 6.39%, which is 1.60% higher than the 4.9% of the county population. The Native American population at this AMI level with Severe Housing Problems is 0.27%, which is 0.23% lower than the 0.5% in the county.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

This HUD Comprehensive Housing Affordability Strategy (CHAS) table displays housing cost burden levels of No Cost Burden: less than 30% of household income spent on housing, Cost Burden: 30-50% of household income is spent on housing and, Severe Cost Burden: more than 50% of household income is spent on housing. The Clackamas County general population racial and ethnic demographics in 2020 were reported in HUD CHAS tables as 77.2% White, 9.6% Hispanic, 4.9% Asian, 1.0% Black, 0.5% Native American/Non-Hispanic and 0.5% Other/Non-Hispanic.

Housing Cost Burdens in Clackamas County table below demonstrates that the White population has a higher percentage of Cost Burden (30-50% of income for housing) and Severe Cost Burden (2.84% and 2.93% more than 77.2% of the county population) than other racial and ethnic groups. The next largest ethnic group is the Hispanic population that appears to have a similar or lower rate of Cost Burden of 6.98% and Severe Cost Burden of 5.33% than the Hispanic county total of 6.9%. However, this measure may be a function of who responded to the data collection surveys at a higher rate. The Hispanic population has increased at a higher rate since 2020 in the jurisdiction as well.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	106,041	27,533	20,458	1,119
White	92,814	23,951	17,432	765
Black / African American	735	94	284	35
Asian	3,771	749	769	124
American Indian, Alaska Native	352	143	204	0
Pacific Islander	139	39	4	0
Hispanic	5,960	1,923	1,090	150

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Discussion:

Per HUD guidance: “A disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% points or more) than the income level as a whole.”

Table 21 lists the number of renter and owner households with no cost burden spending less than 30% (<30%) of their household incomes on housing. The 106,041 total number of <30% no cost burden households were 87.53% White which is 10.33% more than 77.2% of Whites in the county jurisdiction. The Hispanic population in the <30% cost burden level were 5.62% of the population which is 3.98% lower than the 9.6% of Hispanics in the county. The Black population represents 0.69% of the no cost burden which is 0.31% lower than the 1.0% of the county population that is Black. The Asian population with no cost burden (less than 30%) level are 3.56% which is 1.34% lower than the 4.9% of the county population. The Native American population at the no cost burden level is 0.33% which is 0.27% lower than the 0.5% in the county.

30-50% Housing Cost Burden - Table 21 lists the number of renter and owner households with housing cost burden at 30-50% of their household incomes. A total of 27,533 households were cost burdened with 30-50% of their incomes spent on housing expenses. Of these cost burdened households, 86.99% were White, which is 9.79% more than 77.2% of Whites in the county jurisdiction. The Hispanic population in this cost burdened level was 6.98% of the population, which is 2.62% lower than the 9.6% of Hispanics in the county. The Black population represents 0.34% of the cost burdened level, which is 0.04% lower than the 1.0% of the county population that is Black. The combined Asian and Pacific Islander population at the cost burdened level is 3.35%, which is 0.66% lower than the 3.84% of the county population. The Native American population at the cost burdened level is 0.74%, which is 0.24% higher than the 0.5% in the county.

Severe Cost Burden - More than 50% of income - Table 21 lists the number of renter and owner households in Clackamas County with severe housing cost burdens spending more than 50% of their incomes on housing. A total of 20,458 households were at the severe cost burden level. Of these households, 85.21% were White which is 8.01% more than 77.2% of Whites in the county jurisdiction. The Hispanic population at the severe cost burden level was 5.33% of the population, which is 4.27% lower than the 9.6% of Hispanics in the county. The Black population represents 0.17% of the severe cost burdened population, which is 0.33% lower than the 0.5% of the county population that is Black. The Asian population at the severe cost burdened level are 3.76%, which is 1.14% lower than the 4.9% of the county population. The Native American population at the severe cost burden level is 1%, which is 0.5% higher than the 0.5% in the county as a whole.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The White population has a higher percentage of Severe Housing Problems at 81.87%, which is 4.67% more than 77.2% of the county population than other racial and ethnic groups. The next largest ethnic group is the Hispanic population that appears to have a lower rate of Severe Housing Problems at 8.08%, which is 1.52% less than the Hispanic population of 9.6%

Extremely low income renters with incomes in the 0 to 80% of AMI have the greatest need and are most at risk of becoming homeless due to rapidly rising rents and increasing housing market pressure to maximize profits on housing investments. The Hispanic population with Severe Housing Problems at the 80 to 100% of AMI is 1.09% more represented in this category than the jurisdiction's general Hispanic population of 9.6%. The White population is over represented by 3 to 4% in all low income levels of 0 to 100% AMI population with Severe Housing Problems compared to the 77.2% of the white population in the county.

If they have needs not identified above, what are those needs?

Other than the rapid increasing number of homelessness impacting all low-income people due to the COVID 19 pandemic, resulting job losses and the rapidly increasing rent burdens due to housing market forces in this metro area, no other needs have been identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Clackamas County has 218 Census Tract Block Groups. Of those 218 block groups, ten percent (10%) or 29 block groups have a population that is more than 56% low and moderate income (LMI). The block group distribution is between high income cities, low income rural areas and unincorporated urban and rural areas.

According to the Census Bureau, 9.6% of Clackamas County residents identified their ethnicity as Hispanic or Latino in the 2020 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.

NA-35 Public Housing – 91.205(b)

Introduction

The geographic area of the Housing Authority of Clackamas County (HACC) is the same geographic area as the county jurisdiction. HACC wait list data for December 2021 indicated that 1401 Households were on the waiting list. Of these, 722 were waiting for rent vouchers and 679 had applied to move into public housing.

Forty percent (40%) of current public housing residents have a disability according to Census data provided by HUD. Thirty four percent (34%) of households on the 2021 wait list had a disabled family member. Eighty five percent (85%) of the households (1184 families) on the waitlist were extremely low income (Less than 30% of AMI). Thirty four percent (34%) of the households added (470 families) to the waitlist had members that were elderly or disabled households.

HACC maintains 545 units of public housing, 1561 Section 8 vouchers providing rental assistance to low income households, 264 units of private market housing, over 100 other housing units in various projects including farmworker housing and 51 Veteran's Administration VASH Vouchers. Based on the table below 541 of the 545 households in public housing have requested accessibility features and 106 of the people in public housing are elderly.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	541	1,549	0	1,479	5	0	65

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	12,319	11,830	0	11,906	5,889	0
Average length of stay	0	0	7	6	0	6	1	0
Average Household size	0	0	2	2	0	2	1	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	106	347	0	340	1	0
# of Disabled Families	0	0	210	525	0	463	3	0
# of Families requesting accessibility features	0	0	541	1,549	0	1,479	5	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	500	1,427	0	1,359	4	0	64
Black/African American	0	0	21	71	0	71	0	0	0
Asian	0	0	9	13	0	12	0	0	1
American Indian/Alaska Native	0	0	10	36	0	35	1	0	0
Pacific Islander	0	0	1	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	36	67	0	66	0	0	1
Not Hispanic	0	0	505	1,482	0	1,413	5	0	64

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Housing Authority of Clackamas County (HACC) (PHA) currently has 35% of public housing residents with a disability according to Census data provided by HUD. The PHA housing needs analysis is based on the HACC public housing Waiting List data from the 2021. One thousand four hundred one (1,401) households requested Housing Choice Vouchers and Public Housing. Eighty five percent (85%) of households (1,184 households) were extremely low income households with incomes of less than 30% of the Area Median Income. Thirty four percent (34%) of households on the wait list had an elderly or disabled family member. Thirty seven percent (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, 2% requested a unit with at least 4 bed-rooms.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Currently there is a general lack of affordable housing for low income households in the jurisdiction and in the region. 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. Public Housing residents and voucher holders are experiencing a lack of ability to move due to the lack of affordable accessible units for rent.

The Housing Authority is now working to get more affordable housing units built for low income families and for elderly and disabled residents. Permanent Supportive Housing would provide services, stable housing and safety from extreme weather for people with addictions and mental health issues.

How do these needs compare to the housing needs of the population at large

Portland metro area voters passed a tax measure to provide funding to build more affordable housing units and to fund Supportive Housing Services (SHS) for homeless and vulnerable persons - due to the rapidly increasing number of homeless person in our metro three-county region.

Public Housing residents of all abilities and ethnicities have the same secure housing needs as the general public. The Housing Authority is now working to re-develop several public housing properties to increase the number of housing units by 400%.

Discussion

Supportive Housing Services (SHS) agreement outlines regional approach to address homelessness. The Housing Authority of Clackamas County operates the SHS program.

Clackamas County Commissioners have approved the signing of an intergovernmental agreement (IGA) with Metro, which lays the groundwork for an extensive regional effort to address the ongoing homelessness crisis.

The IGA solidifies the Tri-County region-wide approach to the implementation of the funds collected via Metro's May 2020 measure establishing a regional supportive housing services (SHS) program. IGAs with the same language are expected to be approved by Multnomah and Washington counties by the end of March 2022.

The SHS program offers a suite of services, uniquely adapted to each individual's needs that help them find and remain in stable, safe housing. The program attempts to correct years of discriminatory practices and focuses on addressing housing instability for people experiencing homelessness across the region, with a call to share responsibility and strengthen coordination between the three counties.

Here are the major service components of Clackamas County's SHS program:

- Supportive Housing Services/Case Management: Helps vulnerable residents successfully transition into permanent housing with ongoing supportive services (or "wraparound" services).
- Regional Long-Term Rent Assistance: Provides flexible and continued rent subsidy that will significantly expand access to housing for households with extremely and very low incomes across the region.
- Short Term Rent Assistance: Rental assistance and supportive services that can be used to prevent a household from becoming homeless.
- Eviction Prevention: Helping those at risk of being evicted. Includes supplying such resources as back-rent, unpaid utility bills, etc.
- Housing Placement/Navigation: Efforts to help residents find rental units. Can range from paying back-rent, application fees, rental opportunities. Aimed at getting people housed and connected to rent assistance.
- Emergency/Transitional Shelter: Immediate safety off of the streets for people experiencing homelessness, fleeing domestic violence, and transitioning out of institutional settings.
- Outreach: Connecting directly with people experiencing homelessness to help them access housing assistance and other resources.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The County’s Coordinated Housing Access (CHA) system was created to allow people experiencing a housing crisis to access all available homelessness prevention and housing programs through a single point of contact. The CHA system provides the best measure of the needs of homeless persons in Clackamas County. A total of 1,908 people in 1,331 households were considered homeless and waiting for housing in 2021. The chart below lists 1,873 people as unsheltered in Clackamas County.

75% of households (998 families) reported a family member with a disability. One hundred ninety-six (196) people were age 62 years or older.

There is a 3-county regional approach to the Point in Time (PIT) count starting in 2022. Clackamas County staff will be providing local data to get Clackamas HMIS data to the Joint Office of Homeless Services (metro regional office).

The Joint Office will be working with Portland State University to compile data to provide Clackamas County with official Point In Time homeless count numbers. Portland State University is also considering putting together a regional dashboard, and each of the counties is talking about local data dashboards.

In January 2022, the County reinitiated an Administrator Housing Task Force was created to pull multiple departments with different expertise to one table to problem solve, analyze and make recommendations to the Board of County Commissioners. This iteration of the task force is comprised of representatives from Health, Housing and Human Services (H3S), Counsel, Public and Government Affairs (PGA), Finance and County Administration. Housing is a big multifaceted topic. Staff will bring forward a series of policy sessions to help the BCC inform a comprehensive county housing portfolio.

The Task Force will follow up with a number of homelessness and housing discussions. Including but not limited to:

- Transitional shelter options like car camping, village models and/or safe rest areas.
- How to implement Oregon House Bill HB 2006. Legislation which requires the county to allow an emergency shelter on land inside an urban growth boundary, as well as in rural residential zoned area outside the urban growth boundary. As long as the standards in the bill are met, typical land use regulations do not apply.
- A discussion about Oregon House Bill HB 3261. Legislation that requires the county (and other local governments) to allow a lawfully

established hotel or motel inside an urban growth boundary to be converted to an emergency shelter or affordable housing. As long as the standards in the bill are met, typical land use regulations do not apply.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	1,873	191	1,873	1,322	1,360	180
Persons in Households with Only Children	35	0	35	0	0	0
Persons in Households with Only Adults	321	0	321	0	0	0
Chronically Homeless Individuals	569	0	569	0	0	0
Chronically Homeless Families	95	0	95	0	0	0
Veterans	63	0	63	0	0	0
Unaccompanied Child	35	0	35	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Coordinated Housing Access (CHA) reports used as data source.

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	35	50	50	50	40	200
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	20	0	0	0	0	0
Chronically Homeless Individuals	5	0	0	0	0	0
Chronically Homeless Families	1	0	0	0	0	0
Veterans	27	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 27 - Homeless Needs Assessment

Data Source Comments: Coordinated Housing Access (CHA) reports used as data source.

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

Clackamas County has both an urban area and a rural area. The County also has incorporated areas and unincorporated areas. The County has an urban growth area boundary for housing and transportation planning purposes that includes both incorporated and unincorporated areas. All people living outside the urban growth boundary are considered to be in rural areas which includes several small towns and larger areas of state and national forests.

Homeless persons in rural areas are living in their cars or in state and national forest campsites.

Of the number of households and people served in the homeless system and performance overview for 10/1/2020 – 9/30/2021 for LSA Submission 2020-2021, the average stay in homelessness was 130 days. Thirty one percent (31%) of people served were able to exit to permanent housing destinations and 3% returned to homelessness.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The Coordinated Housing Access database was able to produce the number of people entering and exiting the homeless services system.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	145	1,035
Black or African American	10	70
Asian	2	7
American Indian or Alaska Native	3	39
Pacific Islander	2	17
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	38	104
Not Hispanic	153	1,146

Data Source

Comments:

Coordinated Housing Access (CHA) reports used as the data source.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

As of January 2022, 1,331 households with 1,908 people needed housing assistance. One thousand fifty one (1051) were in Adult only Households.

Veterans: 79 of the homeless households had a veteran. 37% (29) were chronically homeless, 43% (34) were homeless and another 16 (20%) were in danger of becoming homeless.

Families with Children: 225 Families w/children were homeless. The average household size was 2.92 which equals 657 people in families with children, 42% of those households had chronic homelessness (95 HH), 28% (63 HH) were homeless and another 30% (67 HH) were in danger of becoming homeless.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

During the 2022 review of housing waitlist data which is considered our homeless population, 1035 people, 77.8% of the total homeless population were white, 88 people (6.6%) were multiple races, 70 people (5.3%) were Black, 39 people (2.9%) were Native American or Alaska Native, 75 people (5.7%) had missing data or refused to answer, 17 people (1.3%) were Native Hawaiian or Pacific Islanders and 7 people (0.5%) were Asian.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Of the one thousand nine hundred and eight (1,908) homeless persons counted in the Coordinated Housing Access waitlist, 98 were in emergency shelter beds mostly temporary until other transitional or permanent housing was found. Most of the emergency shelter beds are for adults.

Clackamas Women's Services and Northwest Family Services are the two domestic violence providers in our Continuum that provide housing to people experiencing homelessness due sexual assault, domestic violence, stalking, the sex industry and elder abuse. The number of shelter beds available for women and children is 290.

There are 40 year round beds for Transitional Housing and 410 beds for rapid rehousing.

These waitlist and homeless count numbers demonstrate that the number of homeless is more than twice the number of available beds and services.

Discussion:

In 2022, Clackamas County Commissioners approved the signing of a Supportive Housing Services (SHS) intergovernmental agreement (IGA) with Metro, which lays the groundwork for an extensive regional effort to address the ongoing homelessness crisis.

The Intergovernmental Agreement solidifies the Portland Tri-County region-wide approach to the implementation of the funds collected via Metro's May 2020 measure establishing a regional supportive housing services (SHS) program.

The SHS program offers a suite of services, uniquely adapted to each individual's needs that help them find and remain in stable, safe housing. The program attempts to correct years of discriminatory practices and focuses on addressing housing instability for people experiencing homelessness across the region, with a call to share responsibility and strengthen coordination between the three counties.

The SHS program goals are spelled out in the county's Local Implementation Plan (LIP). Achieving the LIP goals has been a high priority for Clackamas County. During the past several months, commissioners have:

- awarded over \$2 million in new contracts with community partners to provide case management, housing navigation and placement, and short-term rental assistance,
- approved directing \$2.23 million from the county's American Rescue Plan Act, or ARPA, funds to support hotel/motel emergency sheltering, which freed up existing money to further advance the LIP goals, and
- developed dozens of contracts with local landlords to provide permanent rent assistance for previously homeless neighbors.

Here are the major service components of Clackamas County’s SHS program:

- Supportive Housing Services/Case Management: Helps vulnerable residents successfully transition into permanent housing with ongoing supportive services (or “wraparound” services).
- Regional Long-Term Rent Assistance: Provides flexible and continued rent subsidy that will significantly expand access to housing for households with extremely and very low incomes across the region.
- Short Term Rent Assistance: Rental assistance and supportive services that can be used to prevent a household from becoming homeless.
- Eviction Prevention: Helping those at risk of being evicted. Includes supplying such resources as back-rent, unpaid utility bills, etc.
- Housing Placement/Navigation: Efforts to help residents find rental units. Can range from paying back-rent, application fees, rental opportunities. Aimed at getting people housed and connected to rent assistance.
- Emergency/Transitional Shelter: Immediate safety off of the streets for people experiencing homelessness, fleeing domestic violence, and transitioning out of institutional settings.
- Outreach: Connecting directly with people experiencing homelessness to help them access housing assistance and other resources.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Every four years Clackamas County Social Services, the Area Agency on Aging for Clackamas County, is required to develop an Area Plan that describes how the agency will use federal Older American Act (OAA) funding and Oregon Project Independence (OPI) funding to assist residents of Clackamas County to remain independent, healthy, and engaged in their communities for as long as possible.

The 2021-2025 Plan includes an overview of the agency, county demographic information, current services and programs available to seniors and their caregivers, an assessment of the need for services for older adults, and a detailed timeline of goals and activities that will be accomplished during the four-year plan period.

Describe the characteristics of special needs populations in your community:

The population of Clackamas County is aging and steadily increasing in racial and ethnic diversity. Older adults are living in poverty, employed, and living with at least one disability than during the previous plan period.

The county's fastest growing population segment is adults age 60 years and older. Between 2010 and 2018, residents age 60 years and older increased by forty percent (40%) or 28,202 people and accounted for 80% of the overall population growth in the county. While the overall percentage of county residents living below the federal poverty line has declined since 2010, the percentage of residents aged 60 and older living in poverty has increased by 68% from 4,139 to 6,920 in 2018. Similarly, while the number of people with a disability has increased by just 281 people in the county overall since 2010, for those aged 65 and older the number has increased from 18,717 to 22,071; 32% of those 65 years or older are living with at least one disability.

While 92.2% of residents age 60 years and older in the county are white, the racial and ethnic diversity in the county is steadily growing in all population segments. This is illustrated within the older adult population by the growth in the number of residents 65 years and older who speak a language other than English at home, which increased by 47% between 2010 and 2018. The largest increase occurred in those who speak Indo-European languages at home, including Russian, which increased from 1,275 residents in 2010 to 2,164 in 2018.

What are the housing and supportive service needs of these populations and how are these needs determined?

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. Seventy seven percent (77.3%) of the total developmentally disabled persons provided with services are White.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The county jurisdiction population with HIV/AIDSs was identified as 484 males and 77 female by the Oregon Health Authority reports in April 2019. HIV/AIDS services and housing are mostly provided in the Portland Metropolitan area by the Cascades Aids Project: <http://www.cascadeaids.org/>

Discussion:

Persons with mobility disabilities including elderly persons continue to face barriers to housing and services 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 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.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Clackamas County is a large and diverse county, covering 1,879 square miles with 15 incorporated cities and towns, as well numerous unincorporated communities. The more urbanized northern section of the county contrasts sharply with the rural and frontier nature of the southern and eastern portions of the county. These were identified as High Needs for Clackamas County: Homeless Facilities, Domestic Violence (services) Facilities, Mental Health Facilities, Senior Centers and Abused/Neglected Children Facilities.

How were these needs determined?

Clackamas County has been impacted by the COVID 19 Pandemic, ice storms, forest fires and a "heat dome" in the past few years. All of these events and the increasing demand for affordable housing has led to a rapid increase in homelessness, thereby increasing the need for Public Facilities to provide services such as food, healthcare and counseling as well as housing for homeless persons.

Clackamas County Metro Bond Local Implementation Plan: Part of a three county regional approach to address homelessness. **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, people with lived homeless 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.

Describe the jurisdiction's need for Public Improvements:

The following public improvements were identified as High Public Improvements Needs for Clackamas County: Water/Sewer Improvements, Street/Alley Improvements, Curbs and Sidewalks, Bike and Pedestrian Paths and, Drainage (street) Improvements.

The jurisdiction's Department of Transportation and Development 2019-2023 Transportation Capital Improvement Plan conducted a self-evaluation of street facilities that are barriers to accessibility. The evaluation resulted in an ADA Transition Plan For the Public Rights-Of-Way (February 2017) which identified 1,917 missing curb ramps, 1,352 non-functional curb ramps, 1,476 curb ramps that failed to meet the standards and only 132 curb ramps that met ADA standards. An estimate provided that based on the current levels of funding, completing these public facilities improvements would take 70 years.

The Pedestrian and Bikeway Advisory Committee also completed an Active Transportation Plan.

Committee work has included development of bicycle and pedestrian safety programs, reviewing bicycle and pedestrian project priorities, and completing the county's Active Transportation Plan.

The Advisory Committee goals include:

- Develop a coordinated system of safe and convenient bikeways and walkways;
- Stimulate public awareness, and
- Examine current and future financing options and budget strategies for bicycle and pedestrian projects.

How were these needs determined?

A community survey of cities and the general public was conducted in September and October of 2016. The County's Transportation Plan also details Public Improvement Needs were identified through community surveys, public housing resident surveys, surveys of city planning staff and public meetings with community groups.

The Department of Transportation and Development ADA Transition Plan for the Public Rights-Of-Way (February 2017) identified the 350 Missing Curb ramps on arterial streets as the top priority for construction. The second highest priority identified was the 566 non-functional curb ramps on arterial streets.

The 2021 Metro Bond Supportive Housing Services Local Implementation Plan (LIP) identified 3,206 Clackamas County households needing providers and facilities to provide housing and housing services to reduce and prevent homelessness.

Describe the jurisdiction's need for Public Services:

The 2021 Metro Bond Supportive Housing Services Local Implementation Plan (LIP) identified 3,206 Clackamas County households needing housing and housing services to reduce and prevent homelessness. Per the LIP: "Households experiencing or at substantial risk of experiencing homelessness require an array of flexible rent assistance and tenant-centered supportive services, such as mental health or substance abuse services, to meet their short and long-term housing needs. Some households will need only one-time resources to prevent homelessness, some will only need rent assistance, others will need long-term rent assistance and long-term intensive supportive services, and many will find that their needs for housing resources change over time."

A study by the 2021 Coalition of Communities of Color Community Engagement found that services in rural areas were lacking. The report found unreliable public transportation, lack of investment in public

transportation, a lack of services in languages different from English, a lack of Emergency shelters and, a lack of Healthy food options resulting in rural food deserts.

How were these needs determined?

These needs were determined through the 2021 Metro Bond Supportive Housing Services Local Implementation Plan identified 3,206 Clackamas County households needing housing and housing services to reduce and prevent homelessness. The 2021 Coalition of Communities of Color Community Engagement Report focus groups also identified the needs for additional public services in Clackamas County.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Portland metropolitan region that includes the Clackamas County 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.

In 2018, regional voters approved a \$652.8 million Metro Affordable Housing Bond for the creation of 3,900 affordable housing units within the urban growth boundary. The bond allows our region the opportunity to invest in the development of new housing resources for some of our most vulnerable and historically marginalized residents.

Recognizing the need and opportunity throughout the region, bond revenue is distributed based on assessed value of each of the three counties within the Metro district. This means that approximately 45% of homes created through the bond will be in Multnomah County, 34% in Washington County, and 21% in Clackamas County.

Funds raised through a new local tax Metro Bond revenues dedicated to Clackamas County are \$116,188,094. As a county without entitlement cities (cities with a population of at least 50,000), all bond resources will be managed by the Housing Authority of Clackamas County (HACC).

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Clackamas County residential properties are 68% single family detached residential units, 4% single unit attached, 5% apartments in 2-4 units, 9% apartments in 5-19 unit developments, 8% in larger 20 or more apartment units and 7% of the housing units are mobile homes, boats, recreational vehicles (RV campers) or vans. The housing market in Clackamas County is under increasing economic pressure due to an influx of persons moving to the region. The region experienced a housing market stagnation during the 2009-2010 economic downturn, which caused many foreclosures and halted most housing construction.

Since 2010, the housing market has re-bounded into a high demand market that is causing a rapid increase in rents and housing costs. Most of the housing in Clackamas County is in good condition since most housing was built after 1980.

A recent survey of 522 English and Spanish speaking homeowners in the North Clackamas Area and the Canby area was 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>.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	112,718	68%
1-unit, attached structure	7,069	4%
2-4 units	7,593	5%
5-19 units	14,481	9%
20 or more units	12,423	8%
Mobile Home, boat, RV, van, etc.	10,736	7%
Total	165,020	100%

Table 28 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	213	0%	2,008	4%
1 bedroom	1,651	2%	10,231	22%
2 bedrooms	13,388	12%	21,133	44%
3 or more bedrooms	92,363	86%	14,155	30%
Total	107,615	100%	47,527	100%

Table 29 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The county jurisdiction is partly within an urban growth boundary that encourages preservation of rural agricultural land and density of residential areas. The state of Oregon (OHCS) maintains a list of assisted housing units in Clackamas County. There are a total of 2,719 assisted housing units in 49 locations are located in the county jurisdiction not including public housing units. One hundred and twelve (112) of these assisted units are targeted for alcohol and drug recovery, 176 are for persons with disabilities, 813 units for elders, 1,618 for low income families.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the state of Oregon Housing and Community Services, Affordable Rental Housing Division, only 1 of the twelve Section 8 contract properties in Clackamas County have contract expiration dates in 2027.

Our Apartments: 1308-1316 Otter Lane Oregon City, OR 97045

All other affordable housing units in Clackamas County have long-term contracts with expirations in early 2030s. This is only for properties with Project Based Section 8 contracts that Oregon State HUD Contract Administration Section is responsible for monitoring. These properties generally have tax credit layering but that is not a part of our responsibilities as PBCA for HUD's PBS8 HAP contracts in Oregon.

Does the availability of housing units meet the needs of the population?

The housing demand for low income families, elders, and persons with disabilities far outweighs the housing availability. About six percent (6.3%) of the 2,678 persons in Clackamas County with chronic mental illness identified in the State of Oregon study in 2013 had housing available to them leaving a gap of 2,509 units.

Only five and a half percent (5.5%) of the 1,554 persons with developmental disabilities had housing available leaving a gap of 1,469 units. Only 15.9% of the frail elderly had housing available leaving a gap of 1,316 units.

These needs have not been met by development of assisted housing units. In some cases low-income units may have been lost to expiring contracts and sale to private investors for re-sale of affordable housing units.

Describe the need for specific types of housing:

As the population in Clackamas County ages, many more small affordable accessible units are needed for low income persons. The market trends are pushing more housing development of larger homes and luxury apartments.

As mentioned earlier in this plan, there is a general lack of affordable housing for low income households. More than 20,000 households with extremely low incomes of less than 30% of AMI are paying more than 50% of their household incomes for housing.

The 2018 County-wide Housing Needs study found that for Urban Unincorporated Areas of Clackamas County, population shifts and increasing housing costs, and other variables are factors that support the conclusion of need for smaller and less expensive units and a broader array of housing choices. Growth of retirees will drive demand for small single-family detached houses and townhomes for homeownership, townhome and multifamily rentals, age-restricted housing, and assisted-living facilities. Growth in Millennials will drive demand for affordable housing types, including demand for small, affordable single-family units (many of which may be ownership units) and for affordable multifamily units (many of which may be rental units).

Discussion

A recent Assessment of Fair Housing (2022-2026) report established a jurisdictional goal of constructing 1500 new units of affordable (rent restricted units) housing over the next 5 years in areas of high opportunity as well as adoption of a Strategic Housing Plan that includes developing revenue sources for construction of affordable housing projects. While this goal of 1500 new units is far from the 20,000 needed units, more affordable and accessible housing in the jurisdiction will directly benefit low-income households, vulnerable populations and protected classes. Affordable housing units once completed will include eligibility requirements for low income and disabled persons. Affordable housing development organizations will be required to reach out to protected classes and vulnerable low income populations in the jurisdiction.

Using the local Metro Bond Affordable Housing funds the Housing Authority of Clackamas County (HACC) plans to be the developer/owner of approximately 450 units of bond-financed housing. Approximately \$63.9 million or 55% of the total bond resources will be used to finance the housing

projects. The remaining balance of \$52.3 million (45%) is available for projects sponsored by non-profit or for-profit developers throughout the eligible Metro boundary within the county.

Clackamas County production goals for Metro Bond funds are to:

- Develop or acquire approximately 812 new affordable housing units
- Meet the needs of families by making at least 406 of the units two bedrooms or larger
- Meet the needs of the County's most vulnerable households by making at least 333 of the units affordable to extremely low-income households earning 30% or less of AMI. At least 200 of these units will be supported with rental assistance provided by HACC.
- Create affordable homes for households earning between 61 – 80% of AMI by using up to 10% of the funding. No more than 81 bond financed units will have rents at this level.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

In the news this week:

The cost of a 1-bedroom apartment in the Portland/Vancouver, WA metro area, has gone up to \$1381 a month, according to **MultiFamily NW**. Between December 2020 and December 2021, the average prices of a home in Portland went from \$494,000 to \$571,900, according to the **Regional Multiple Listing Service**. The Portland metropolitan statistical area (MSA) is one of 20 markets where the median home sales price ranged from \$537,400 to \$1.675 million, a family needed more than \$100,000 to afford a 10% down payment mortgage (17 markets in the previous quarter).

WASHINGTON (February 10, 2022) – The fourth quarter of 2021, much like the third quarter, saw home prices continue to increase, although at a slower pace. Fewer markets in the last quarter experienced double-digit price gains.

According to the latest quarterly report from the National Association of Realtors®, out of 183 measured markets, 67% of the metros reached double-digit price appreciation compared to 78% in the prior quarter. Nationally, the median single-family existing-home price rose at a slower rate of 14.6% year-over-year to \$361,700 compared to the year-over-year pace in the previous quarter (15.9%). While the third quarter of 2021 witnessed all regions achieve double-digit price gains, the fourth quarter saw only the South experience double-digit price appreciation (17.9%), and single-digit price gains in the Northeast (6.8%), Midwest (8.6%), and the West (7.7%).

The HUD table below indicates a 6% increase from 2009 to 2017 however the increase in just the past year has been over 10%

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	323,600	341,600	6%
Median Contract Rent	741	994	34%

Table 30 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	5,022	10.6%
\$500-999	19,635	41.3%
\$1,000-1,499	15,126	31.8%
\$1,500-1,999	5,287	11.1%
\$2,000 or more	2,423	5.1%
Total	47,493	100.0%

Table 31 - Rent Paid

Data Source: 2013-2017 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,805	No Data
50% HAMFI	5,925	3,309
80% HAMFI	21,602	10,153
100% HAMFI	No Data	18,990
Total	29,332	32,452

Table 32 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,040	1,134	1,325	1,916	2,327
High HOME Rent	981	1,053	1,264	1,452	1,600
Low HOME Rent	770	825	990	1,143	1,275

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There is not sufficient housing for households at all income levels particularly low-income and moderate income households.

How is affordability of housing likely to change considering changes to home values and/or rents?

The affordability of housing will likely decrease for low income and moderate income household due to several factors. The demand for housing continues to rise due to numerous factors including; increasing

costs due to supply chain issues, climate changes, increased labor costs due to COVID illness and fewer people becoming laborers. There may be some increased efficiency in housing production because of improvements in manufactured housing and development of smaller energy efficient homes.

The 2018 County-wide Housing Needs Assessment found that the need to make a qualitative assessment of the future housing market. The following is a discussion of how demographic and housing trends are likely to affect housing in Urban Unincorporated Clackamas over the next 20 years:

1. Growth in housing is driven by growth in population. Between 2019 and 2039, Urban Unincorporated Clackamas' population is forecasted to grow from 97,040 to 115,440, an increase 18,400 people – a 19% increase in population.
2. Housing affordability will be a growing challenge in the area. Housing affordability is a challenge in most of the region in general, and Urban Unincorporated Clackamas is affected by these regional trends. Housing prices are increasing faster than incomes in Clackamas County, which is consistent with state and national challenges. Urban Unincorporated Clackamas has a modest share of multifamily housing (about 27% of the area's housing stock), and almost half of renter households are cost burdened. Urban Unincorporated Clackamas' key challenge over the next 20 years is providing opportunities for development of relatively affordable housing of all types, from lower- cost single-family housing to market-rate multifamily housing.
3. Without substantial changes in housing policy, on average, future housing will look a lot like past housing. That is the assumption that underlies any trend forecast, and one that is important when trying to address demand for new housing.
4. If the future differs from the past, it is likely to move in the direction, on average, of smaller units and more diverse housing types. Most of the evidence suggests that the bulk of the change will be in the direction of smaller average house and lot sizes for single-family housing. This includes providing opportunities for development of smaller single-family detached homes, townhomes, and multifamily housing.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Housing Authority of Clackamas County is now paying 120% of FMR in certain areas of the county due to the very high rents.

According to <https://www.rentdata.org/states/oregon/2021>,

Fair Market Rent (FMR) prices in Portland-Vancouver-Hillsboro are very high in comparison to the national average. This FMR area is more expensive than 98% of other FMR areas. Fair Market Rent for a two-bedroom apartment in Portland-Vancouver-Hillsboro is \$1,536 per month.

The previous year, rent for a two-bedroom home was \$1,495 per month. This is a 2.74% increase year-over-year.

Oregon (OR) has the 17th highest rent in the country out of 56 states and territories. The Fair Market Rent in Oregon ranges from \$734 for a 2-bedroom apartment in Harney County, OR to \$1,536 for a 2-bedroom unit in Portland-Vancouver-Hillsboro, OR-WA metropolitan statistical area (MSA).

For FY 2021, the Portland-Vancouver-Hillsboro, OR-WA MSA (Yamhill County) rent for a studio or efficiency is \$1,245 per month and \$2,657 per month to rent a house or an apartment with 4 bedrooms. The average Fair Market Rent for a 2-bedroom home in Oregon is \$1,053 per month.

The County will continue to use federal, state, local and private market funds to increase housing units for extremely low and moderately low income persons.

The Housing Authority of Clackamas County now has a Housing Development team to work on re-development of three public housing properties that are 20 acres each and located within city boundaries.

Discussion

The 2018 Countywide Housing Needs Assessment found the key assumptions and provided an estimate of new housing units needed in Urban Unincorporated Clackamas between 2019 and 2039. A 20-year household forecast (in this instance, 2019 to 2039) is the foundation for estimating needed new dwelling units. This section presents Metro's forecast for household growth in Urban Unincorporated Clackamas County, including future annex areas. According to Metro's forecast, Urban Unincorporated Clackamas will grow from 36,514 households in 2019 to 44,689 households in 2039, an increase of 8,175 households needing a home.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Clackamas County is primarily single family residential homes mostly built after 1980. Multi-family housing is located in high-density urban areas also mostly built after 1980. Rural towns have some multi-family housing units and manufactured home parks as well. As indicated in Table 33 below, 51% of the owner-occupied single family homes and 56% of the renter-occupied homes were built after 1980. Only 11% of the owner-occupied homes and 9% of the renter-occupied homes were built before 1950. Very few private homes are vacant and the rental vacancy rate is less than 2%.

Definitions

Clackamas County administers a Housing Rehabilitation Program. The program guidelines include a definition of Substandard housing (dwelling unit). A substandard dwelling unit is one that does not meet the HUD Housing Quality Standards at CFR 882.109 or other criteria for an acceptable standard of living. The substandard conditions may be due to the age of unit, neglect, inadequate plumbing facilities, lack of heating and cooling, crowded conditions, or other code violations.

A determination of Substandard but Suitable for Rehabilitation is for a dwelling that unit is considered suitable for rehabilitation if it is structurally sound and can be brought up to standard condition within the cost limits of the Housing Rehabilitation Program.

The definition of a Substandard not Suitable for Rehabilitation is a dwelling unit that is unsuitable for rehabilitation if it is deteriorated to the extent that rehabilitation is not economically feasible within the cost limits of the Housing Rehabilitation Program and the financial means of the owner.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	27,799	26%	21,327	45%
With two selected Conditions	421	0%	1,853	4%
With three selected Conditions	10	0%	85	0%
With four selected Conditions	0	0%	15	0%
No selected Conditions	79,419	74%	24,193	51%
Total	107,649	100%	47,473	100%

Table 34 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	20,343	19%	8,288	17%
1980-1999	34,753	32%	18,422	39%
1950-1979	40,802	38%	16,708	35%
Before 1950	11,721	11%	4,090	9%
Total	107,619	100%	47,508	100%

Table 35 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	52,523	49%	20,798	44%
Housing Units build before 1980 with children present	12,424	12%	8,020	17%

Table 36 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 37 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

The Clackamas County Housing Rehabilitation Program assists 35 to 40 home owners every year with home repair loans and home access grants. As stated earlier based on HUD provided data, over 20,000 households in the county are paying more than 50% of their incomes for housing. Low income elderly and low income disabled households will income qualify for housing rehabilitation assistance. There are 27,729 owner-occupied housing units identified as having at least one problem/condition representing 26% of all owner occupied housing units. There are 21,327 renter occupied units have been identified as having at least one condition/problem representing 45% of all renter occupied units.

Clackamas County has very few vacant housing units due to the current high demand for all types of housing.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

HUD established estimates for the likelihood of lead-based paint based on the age of units: 90% of units built prior to 1940, 80% for units built between 1940 and 1959, and 62% of units built between 1960 and 1979. However, the presence of lead-based paint (LBP) alone is not a direct indication of lead-based paint hazard. Hazard is a function of several factors, including age and condition.

Recent surveys have attempted to provide a more accurate estimate of lead-based paint hazards. A 1999 national survey found declining chances of hazards with new buildings: 67% for housing build before 1940, 51% for houses built between 1940 and 1959, 10% for houses built between 1960 and 1977, and 1% for houses built after that.

Source: Clickner, R. et. al. (2001). National Survey of Lead and Allergens in Housing, Final Report, Volume 1: Analysis of Lead Hazards. Report to Office of Lead Hazard Control, US Department of Housing and Urban Development.

Table 36 Risk of Lead-Based Paint (LBP) Hazard indicates that 12% of the owner-occupied units have children present, a total of 12,424 housing units and 17% of the renter-occupied units have children present for a total of 8,020 units. The combined number of housing units built before 1980 with children present would be 20,444 units that could be at risk of LBP hazard.

The number of households in the county listed in Table 6 with incomes below 100% of Household Area Median Family Income (HAMFI) is 8,795 households. If we use an assumption that 75% of these households are in LBP hazard units then the number would be 6,596 low-income households at risk of lead paint exposure.

Discussion

A review of single and multi-family new 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, three or four family unit developments and developments with five 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). Four hundred and eight (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.

The Clackamas County cities with the most building of residential homes in the last 5 years are the cities of Oregon City, Molalla and Estacada.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Housing Authority of Clackamas County (HACC) manages 560 units of public housing. This housing portfolio is organized and managed in five separate projects as noted in the table below. All public units are leased to qualified households earning less than 80% of the area median income. Rents are income based where a household pays only 30% of its adjusted monthly income. Public housing is restricted to families, single parent households, elderly and disabled persons. Based on a waiting list of about 51,400 households, the demand for public housing is about five times the supply of qualified units.

The Housing Authority of Clackamas County (HACC) recently completed a thorough, community-focused process to develop its Local Implementation Strategy (LIS) to use local tax revenue bond funds for housing production. The LIS aims to sustain Clackamas County's livability, particularly for those most in need. It will guide the County's efforts as it works to create affordable housing using its allocation of Housing Bond proceeds. The LIS also outlines a commitment to furthering community goals of preventing displacement, advancing racial equity and inclusion, creating affordable housing options in locations where there are none, and helping address homelessness in the community. Production goals and priorities identified in the LIS include:

Production Goals: Develop or acquire 812 or more affordable housing units, of which:

- 406 will be family-sized units (defined as two or more bedrooms);
- 333 units will be for households earning 30% or less of area median income (AMI); and
- No more than 81 bond financed units will be reserved for households earning between 61 – 80% of AMI.

Priority Communities: Create housing access and opportunities for:

- Communities of color;
- Families, including families with children and multiple generations;
- Seniors;
- Veterans;
- People living with disabilities;
- Individuals exiting the foster care system;
- Households experiencing homelessness and/or facing imminent displacement.

Location Priorities:

- Preference for neighborhoods that have good access to transportation, grocery stores, school, commercial services, and community amenities;
- Accessible support services (including addiction services and mental and physical health services).

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project -based	Tenant -based	Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			560	1,486			0	0	663
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Housing Authority owns 544 units of public housing and scattered sites that are part of the public housing agency plan. Chronic under funding of the capital improvement grants from HUD has made maintaining these units extremely difficult. The housing authority applied for a HOPE VI grant from HUD to re-develop many of these units, However that grant request was not funded.

The Housing Authority of Clackamas County (HACC) manages 560 units of public housing. This housing portfolio is organized and managed in five separate projects as noted in the table below. All public units are leased to qualified households earning less than 80% of the area median income. Rents are income based where a household pays only 30% of its adjusted monthly income. Public housing is restricted to families, single parent households, elderly and disabled persons.

Based on a waiting list of about 1,400 households, the demand for public housing is about three times the supply of qualified units.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 39 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

A comprehensive third party capital assessment completed in February of 2016 by EMG, Inc., indicated that the long term capital needs for all projects exceed the annual funding stream by three to four times the amount of available funding. For example, the long term capital needs for Clackamas Heights are about \$121,441 per unit. However, funding through HUD’s capital grant program is only projected be approximately \$31,250 per unit.

To provide a context for the capital needs identified above, projects 1000 & 3000 were constructed in 1943 and have been rehabilitated several times. The construction type for these projects, although adequate to meet or exceed minimum HUD condition standards, has far exceeded their useful life.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Based on the capital needs of the public housing inventory described above, the Housing Authority of Clackamas County (HACC) is in the process of studying the feasibility of redevelopment of all projects except for 144 Scattered Sites. The Scattered Sites are in good condition and have the potential for long term viability. HACC is considering the redevelopment of all its public housing sites other than the Scattered Sites.

The HACC PHA goals for 2022 to 2026 detail the following goals as the immediate needs of PHA residents:

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. Improve access & housing choice for everyone, with a focus on protected classes and single parent households.
3. Enforce Fair Housing laws and increase public understanding of Fair Housing laws.
4. Improve the quality of Housing Authority assisted housing and customer service.
5. Improve the community quality of life and economic vitality.
6. Promote self-sufficiency and asset development of families and individuals.

Discussion:

In 2018, regional voters approved a \$652.8 million Metro Affordable Housing Bond for the creation of 3,900 affordable housing units within the urban growth boundary. The bond allows our region the

opportunity to invest in the development of new housing resources for some of our most vulnerable and historically marginalized residents.

Recognizing the need and opportunity throughout the region, bond revenue distribution is based on assessed value of each of the three counties within the Metro district. This means that approximately 45% of homes created through the bond will be in Multnomah County, 34% in Washington County, and 21% in Clackamas County.

Bond revenues dedicated to Clackamas County are \$116,188,094. As a county without entitlement cities (cities with a population of at least 50,000), all bond resources will run through the Housing Authority of Clackamas County (HACC).

HACC will be the developer/owner of approximately 450 units of bond-financed housing and will use approximately \$63.9 MM or 55% of the total bond resources. The remaining balance, \$52.3MM or 45%, is available for projects sponsored by non-profit or for-profit developers throughout the eligible Metro boundary within the county.

Clackamas County production goals for Metro Bond funds are to:

- Develop or acquire approximately 812 new affordable housing units
- Meet the needs of families by making at least 406 of the units two bedrooms or larger
- Meet the needs of the County's most vulnerable households by making at least 333 of the units affordable to extremely low-income households earning 30% or less of AMI. At least 200 of these units will be supported with rental assistance provided by HACC.
- Create affordable homes for households earning between 61 – 80% of AMI by using up to 10% of the funding. No more than 81 bond financed units will have rents at this level.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The County jurisdiction is also one Continuum of Care region (OR-507).

The Combined Data of several recent homeless reports indicates the following trends:

- Significantly more Adult Only Households are unsheltered. However, the current inventory has little capacity for Adult Only Households.
- There was a dramatic increase in need specifically for the Youth Households under 25, which could be attributed to increased outreach services for youth.
- There was a significant decrease in unsheltered Veterans, which could be attributed to the availability of veteran’s specific resources. Please note that those in the Veterans Village remain on the CHA waitlist.

- The population within the UGB in need of services is over five (5) times greater than the population outside of the UGB. The top five (5) communities reported outside the UGB include: Molalla (25), Canby (24), Sandy (19), Estacada (10) and Boring (10).

This data shows there is a need for additional shelter in Clackamas County. Clackamas County has been using a hotel/motel shelter model in which the rooms were rented. Other counties such as Lane, Multnomah, and Washington have also been using a hotel/motel shelter model but with properties that were purchased and owned through Project Turnkey state funding.

The County’s Coordinated Housing Access (CHA) system purpose is to allow people experiencing a housing crisis to access all available homelessness prevention and housing programs through a single point of contact. The CHA system provides the best measure of the needs of our unhoused neighbors.

The 2021 total inventory of year-round beds for homeless persons includes 120 Extreme weather beds for climate emergencies, 72 beds for households without children, 168 beds for households with children for 240 Emergency Shelter beds. Homeless Transitional Housing facilities include 227 DV beds for families with children and 63 beds for Adult only households for a total of 290 Transitional Housing DV survivor beds. Other Transitional Housing and interim housing includes 33 beds for families with children, 47 beds for Adult only households for a total of 80 transitional beds. The grand total of all beds is 730. The Housing Authority is currently remodeling an elder care facility to become 47 studio units for homeless and disabled people to have secure permanent housing as well as services in one location. The Webster Road apartments will include nutrition, health care, dental care and mental health services onsite.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	168	120	0	0	0
Households with Only Adults	72	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	33	0	0
Unaccompanied Youth	0	0	0	0	0

Table 40 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Participants are referred to a shelter program through CHA based on a vulnerability assessment. They are placed in a hotel/motel room for immediate shelter. Then, participants are connected with a shelter services provider for wrap around support services. These shelter support services provide key supports for program participants and are linked to fewer calls to emergency services. Ensuring partnerships and effective communication between the shelter support service provider and law enforcement facilitates more positive interactions with local residents and businesses. The hotel/motel program must be linked to housing navigation and case management services paired with rental assistance to move people from the shelter into permanent housing for successful program outcomes and to keep costs down.

Oregon is a Medicaid Expansion state. The county homeless services providers in the Continuum of Care (CoC) collaborate extensively with partners County Health Centers, Oregon Health Plan (OHP), Cover Oregon, Oregon Health Authority, Volunteers in Medicine, VA Medical, and employers to ensure that homeless participants are enrolled in both Medicaid (OHP) and private-pay insurance at affordable rates.

As indicated on the 2019 Continuum of Care funding application, 96% of adult participants who exited CoC programs or remained in programs (stayers) had health insurance. This rate has held at 90% for 2 years. CoC programs also assist participants with referrals to Medicaid/Medicare related programs such as SHIBA for Medicare Part D enrollment, filling out Medicare extra help forms and securing in home care. One outcome resulting from partnership with VA Medical is that the VASH Social worker stationed at Clackamas County Veterans Service Office helped 30 homeless veterans in FY 15-16 become vested and enroll in VA health care and/or co-enroll in OHP for dental coverage.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Participants are referred to a shelter program through Coordinated Housing Assessment (CHA) based on a vulnerability assessment. They are placed in a hotel/motel room for immediate shelter and connected with a shelter services provider for wrap around support services. These shelter support services provide key supports for program participants and are linked to fewer calls to emergency services. Ensuring partnerships and effective communication between the shelter support service provider and law enforcement facilitates more positive interactions with local residents and businesses. For successful program outcomes and to keep program costs down, the hotel/motel program must be linked to housing navigation and case management services paired with rental assistance to move people from the shelter into permanent housing.

The 2021 total inventory of year-round beds for homeless persons includes 120 Extreme weather beds for climate emergencies, 72 beds for households without children, 168 beds for households with

children for a total of 240 Emergency Shelter beds. Homeless Transitional Housing facilities include 227 DV beds for families with children and 63 beds for Adult only households for a total of 290 Transitional Housing DV survivor beds. Other Transitional Housing and interim housing includes 33 beds for families with children, 47 beds for Adult only households for a total of 80 transitional beds. The grand total of all beds is 730.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

In Clackamas County, Special needs services and facilities including housing are provided by non-profit service agencies, faith-based organizations and county agencies including the Social Services Division, the Behavioral Health Division, the Housing Authority (HACC) and the homeless Continuum of Care providers.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The needs of low income families, elders, and persons with disabilities far outweighs the housing availability. The recent Assessment of Fair Housing survey included responses from persons with disabilities who felt that they could not move because they could not find any accessible and affordable units.

H3S Behavioral Health Division staff coordinate special needs housing and services for a total of 391 persons. Twenty three (23) persons living in five Adult Foster Homes; twenty are funded by Medicaid and three are non-Medicaid eligible or undocumented individuals. Behavioral Health also works with seven (7) programs that provide sixty five (65) persons with care in Residential Treatment Homes/Facilities also funded by Medicaid. In addition, two programs monitored by Psychiatric Security Review Board (PSRB) with eighteen (18) residents total. Behavioral Health Division staff coordinate services for twenty 29 persons living in supportive housing units funded by a combination of Continuum of Care, HUD 811 , Section 8 and state mental health funding.

Social Services Division staff provide services to 2,328 youth and adults living independently or living in group homes for persons with developmental disabilities.

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. Seven hundred ninety-two (792) of the 3,120 people receive their case management from one of the five Support Service Brokerages that operate in the jurisdiction.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

These discharge policies are listed as part of the Continuum of Care although many are state policies.

Foster Care Discharge Policy: The Oregon Department of Human Services (DHS), dictates the Foster Care Discharge Policy in Clackamas County. DHS refers willing children to a CoC homeless services provider for a Life Skills/Transition Readiness Assessment.

The assessment provides: 1. Identification of resources and linkages needed to assist the child in transitioning to independent living, including life skills training, housing subsidies, college tuition, and health insurance; and 2. Preparation of an individualized Comprehensive Transition Plan which must be approved by a Family Court Judge every 6 months until the child is successfully transitioned to independent living. Youth can access Chafee rental subsidies to help them secure an apartment as well as tuition-free access to a state college along with Chafee grants to assist with room and board. Youth with developmental disabilities and/or mental illness exiting the foster care system continue to receive an array of services including options such as adult foster care and supported housing that are based on unique client needs.

Health Care: Discharge planning for low income and disabled people is dictated by the State of Oregon through the Medicaid program. The Affordable Care Act (ACA) and the expansion of Oregon's Medicaid program has shifted discharge planning to Coordinated Care Organizations (CCOs) covering Clackamas County. The CCOs integrate physical, mental, and dental health services. The ACA Medicaid expansion aligns the financial incentives with clinical outcomes/housing status of patients.

Upon discharge, homeless persons could go to a variety of housing situations: 1. Medical foster home, a family or friend's home with wrap-around in-home services, a licensed residential care, an assisted living facility or a nursing home, depending on level of medical need; 2. Substance abuse treatment; 3. Mental health housing; 4. Shelter or rapid rehousing program.

Mental Health: Clackamas County Behavioral Health Department (CCBH) ensures the Discharge Policy for persons being discharged from a mental health facility. As part of Health Share, the area's Medicaid Coordinated Care Organization, CCBH has both financial and clinical incentives to ensure that no county residents are discharged from a psychiatric hospital without housing and services.

Corrections: Successful community re-entry for inmates is a local mandate spearheaded by the Clackamas County Sheriff's Office (CCSO) which participates on the homeless CoC governing board. CCSO promotes post-discharge services with housing to reduce recidivism. The Clackamas County Behavioral Health (CCBH) is a provider in the local Medicaid program, Health Share. CCBH understands that successful re-entry will reduce incidence and cost of ER visits and hospitalization. Two full time mental health professionals on-site at the jail identify and treat inmates with behavioral health issues. Mental Health and Drug Courts provide diversion options for inmates with psychiatric and/or addictions problems. Housing, treatment and close supervision are offered through these Court programs. Newly funded by the State's Reentry Reinvestment Fund, services for persons with mental illness and/or addictions who are exiting jail are being augmented with two case managers, one bilingual addictions counselor, peer counselors, a nurse practitioner and short term transitional housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

In the 2022 program year, Clackamas County will fund the following housing projects and supportive services for non-homeless persons:

- Housing Rehabilitation program will fund housing improvements for renters and owners with disabilities
- Employment investment program employment training for persons with disabilities and persons in public housing.
- HOME Multifamily Housing project will provide some housing units to persons with disabilities.
- The County will continue to provide support services to 2,328 youth and adults living independently or in group homes for persons with developmental disabilities.
- The County Behavioral Health Division staff will continue to coordinate special needs housing and services for 391 persons with mental illnesses.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

See previous answer.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Local land use policies tend to limit affordable housing projects and multifamily housing developments to specific areas of the city usually inside the urban growth boundary. The current pandemic and the rapidly increasing cost of real estate and rents has made the Portland metro area including urban and rural Clackamas County, one of the least affordable metro areas in the country. More and more people are on the verge of losing their place to live. The majority of resident feedback during Assessment of Fair Housing 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. 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”). Clackamas will be evaluating the feasibility and the various options for implementing inclusionary zoning within the county.

- **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.

The County is also in process of substantially revising the Land Use Comprehensive Plan, Chapter 6 Housing, in response to HB2001 and other housing market demands. The Comprehensive Plan housing zoning code only applies to urban areas that are unincorporated or outside of city boundaries.

- **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.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The Oregon unemployment rate has dropped from 6.3% in December 2020 to 4.1% in December 2021. The unemployment rate listed in the chart below was accurate in May 2021. The unemployment rate for people ages 16-24 is listed as 16.24% which seem about right. Employers across the state and in Clackamas County are having difficulty finding new employees due to numerous factors including pandemic Coronavirus illnesses and fears as well as the "great resignation" that has many older workers re-prioritizing their work life balance.

In Clackamas County 54% of the labor force commutes for less than 30 minutes to get work according to the chart below however, due to the pandemic at least 50% of the workforce has been working from home offices. Schools are having difficulty retaining teachers and finding staff throughout the County. Major business activity and employment sectors include; Education and Health Care Services, Retail Trade and Manufacturing. The labor force of over 200,000 persons is well educated with over 110,000 people with some college or a Bachelor’s degree or higher.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	3,376	4,023	2	3	1
Arts, Entertainment, Accommodations	18,849	17,021	12	11	-1
Construction	14,337	14,693	9	10	1
Education and Health Care Services	28,850	25,626	18	17	-1
Finance, Insurance, and Real Estate	10,089	8,416	6	6	0
Information	3,783	2,157	2	1	-1
Manufacturing	19,020	18,869	12	13	1
Other Services	8,260	7,848	5	5	0
Professional, Scientific, Management Services	17,682	12,923	11	9	-2
Public Administration	0	0	0	0	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Retail Trade	21,054	21,062	13	14	1
Transportation and Warehousing	5,994	3,809	4	3	-1
Wholesale Trade	10,742	11,842	7	8	1
Total	162,036	148,289	--	--	--

Table 41 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	211,443
Civilian Employed Population 16 years and over	199,635
Unemployment Rate	5.57
Unemployment Rate for Ages 16-24	16.24
Unemployment Rate for Ages 25-65	3.74

Table 42 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	54,194
Farming, fisheries and forestry occupations	7,889
Service	19,388
Sales and office	50,577
Construction, extraction, maintenance and repair	16,226
Production, transportation and material moving	9,315

Table 43 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	97,487	54%
30-59 Minutes	66,841	37%
60 or More Minutes	15,815	9%
Total	180,143	100%

Table 44 - Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	8,944	1,038	3,914

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	31,244	1,759	11,551
Some college or Associate's degree	61,153	3,229	15,714
Bachelor's degree or higher	64,409	2,088	11,857

Table 45 - Educational Attainment by Employment Status

Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	451	926	1,985	2,212	1,714
9th to 12th grade, no diploma	3,849	2,759	1,831	4,189	3,642
High school graduate, GED, or alternative	10,267	10,289	9,957	24,263	17,149
Some college, no degree	11,921	13,226	13,574	31,237	17,397
Associate's degree	2,126	5,206	5,171	11,744	4,413
Bachelor's degree	2,962	12,052	12,758	27,383	12,470
Graduate or professional degree	113	4,378	7,009	14,840	9,660

Table 46 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	881,460
High school graduate (includes equivalency)	1,427,630
Some college or Associate's degree	1,671,310
Bachelor's degree	2,501,590
Graduate or professional degree	2,705,905

Table 47 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Major employment sectors in Clackamas County as indicated in Table 39 include; Education and Health Care Services with 25,626 jobs/28,850 workers, Retail Trade with 21,064 jobs/21,054 workers,

Manufacturing with 18,869 jobs/19,020 workers, Arts, Entertainment and Accommodations with 17,021 jobs/18,849 workers. The Professional, Scientific, Management Services has increased due to changing work to 12,923 jobs and 17,682 workers. Construction has also increased to 14,693 jobs and 14,337 workers to rapid increase in housing demands.

The employment rate for Clackamas County listed in the Labor Force Table above has dropped to 4.1% in December 2021. Source: https://ycharts.com/indicators/oregon_unemployment_rate

The future of work is changing as more workers are establishing home offices and re-considering the work life balance, childcare needs and health care concerns overall.

Describe the workforce and infrastructure needs of the business community:

The Clackamas Workforce Partnership 2019-2020 annual report detailed that 4,275 adults searched for employment opportunities through the WorkSource Clackamas System. 247 youth were provided employment services including 26 that attained a GED or diploma. 61% of adults in training attained a credential or degree to increase their earning potential.

Businesses in Clackamas County were deeply impacted in the first few months of the COVID-19 closures according to Clackamas Workforce Partnership. Many businesses continue to struggle today. Funds served 702 affected or impending lay-off/furlough employees. Lay-off aversion projects averaged \$3,400 and allowed these businesses and organizations to continue to operate by establishing remote work stations, shifting in business models, and creating safe work spaces for their employees. CWP is proud we were able to provide emergency COVID-19 response funds to 15 local nonprofit and community organizations and an additional 34 local businesses during the first two months of the pandemic closures.

The business community workforce needs include a larger pool of trained, flexible, and motivated workers.

Infrastructure needs for the business community includes industrial land to locate businesses and manufacturing as well as roads and bridges to transport goods.

The lack of accessible, affordable childcare is a national crisis, and Clackamas County is no exception. Our country has long experienced a shortage of affordable childcare options: there are simply not enough program slots to accommodate local families, and the costs of available slots are often too burdensome for working parents. Quality childcare services are integral to the positive development and growth of children, and the families hardest hit by this crisis are often those already facing the greatest barriers to social mobility and economic equality, including Black, Indigenous, and People of Color (BIPOC), low and middle-income families, rural residents, single parents and nontraditional families, and women. The impact of this crisis extends beyond the families directly affected to include local employers and communities.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

During the current COVID-19 pandemic, Clackamas has remained one of the five most impacted counties in the State of Oregon, with over 2,000 reported infections, 59 documented deaths, and high rates of business closures and worker lay-offs.

During this challenging time, it was our nonprofit and community-based organizations that stepped up to help people obtain protective equipment, put food on the table, pay rent, access to internet, and get connected to employment and job-placement services.

As the Portland metropolitan area increases its population over the next 5 years, housing and transportation challenges will impact how the economy and the business community grows. The state of Oregon continues to debate how best to improve public transportation and the federal highways, particularly the Interstate Highway 5 bridge crossing between Oregon and Washington.

Federal American Rescue Plan funds of \$81 million will provide needed supported for Public Health, Businesses, Community base Organizations and Broadband expansion throughout the county to increase connectivity for all residents.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Clackamas Community College offers degree and certificate programs in 3 locations including Wilsonville, Milwaukie and Oregon City as well as online. These training programs seem to be addressing the needs of the workforce and employers. Degree and certificate programs include accounting, business, nursing, gerontology, construction trades, manufacturing, welding, electronic engineering, web design, and welding.

The Clackamas Workforce Partnership (CWP), a Workforce Development Board, is providing a "Solutions Series Program" for employers that includes; Introduction to Workforce Solutions, A Family Friendly Workforce, Second Chance Employment, The Future of Workforce - Hosting Student Interns, Succession Planning and Strengthen Your Leadership Style.

CWP annual report: "Economic developers use workforce development as a way to increase equity among our region's diverse population. Increasing access to equal education opportunity and workforce development programs help to build pathways out of poverty and into higher wage jobs. As a leader in workforce development, our plan focuses on four core goals of Business, Job Seeker, the Emerging Worker and Resource Development. This plan is rooted in guiding principles of equity and

advancement, sector strategy for the needs of the County workforce and a shared goal of workforce prosperity across Clackamas County."

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Clackamas County's Children, Family & Community Connections (CFCC), has a long-standing reputation in delivering quality employment and training programs. CFCC offers customized employment services for low-income Clackamas County residents. CFCC services increase skills, confidence, wage potential, and create long-term employment opportunities. Long-term career path employment opportunities benefit both the program participant and local area businesses.

CFCC's Veteran employment program provides intensive one-on-one workforce services to Clackamas County veterans from all military eras. Our services include co-case management with other veteran specific service providers including housing, social services, vocational rehabilitation. We coordinate wrap-around services with veteran specific organizations such as Tools for Troops, Fort Kennedy, local VFWs and more. Services are available for those veterans living with Post Traumatic Stress Disorder (PTSD) and/or Traumatic Brain Injury (TBI).

CFCC's Employment Investment Program (EIP) provides intensive one-on-one services to Clackamas County residents who benefit from assistance navigating training and employment opportunities. The program is designed for individuals who want to work may not qualify for other programs and/or need longer term assistance and support. Referral partners include Housing Authority of Clackamas County, Clackamas Women's Services, Clackamas County Urgent Mental Health Center, Social Services, Community Court, Vocational Rehabilitation and more. Person-centered services include co-case management and access to wrap-around services. Services can be provided virtually or in person as desired by the participant.

CFCC operates as a job search and training center. Our facility follows COVID-19 safety rules including physical distancing, facemasks (must cover nose and mouth), sanitation and contact tracing. The Center is located conveniently next door to the Tri-Met Bus Mall with easy access to I-205 and Hwy 99. Services are also available virtually.

The Consolidated Plan goals include public services that support employment training for low-income persons and persons with disabilities.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Economic development activities were not identified as a high need during the community survey and community meetings process. However, due to the negative economic impacts of the COVID-19 pandemic, the county has allocated \$4 million of American Rescue Plan Act to support businesses and business recovery centers in Clackamas County.

Clackamas County does have an Economic Development Council (EDC) with a mission to create prosperity by fostering balanced economic development in Clackamas County through a close partnership with government and the private sector. website:
<https://www.clackamas.us/business/edc.html>

Discussion

Economic development activities were not identified as a high need during the community survey and community meetings process, however, due to rural area economic needs, a microenterprise revitalization program will be funded for at least three years to provide a public service of technical assistance to underserved entrepreneurs to start and grow microbusinesses during the 2022-2026 Consolidated Plan cycle.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Since 2000, the Clackamas County population has grown 24.8% in the past two decades to 423,420. Clackamas County has become more racially diverse in the past 20 years seeing significant growth in the Black (+103%), Asian (+106%) and Hispanic (+107%) populations.

At this time the jurisdiction has no data on concentrations of households with multiple housing problems. The jurisdiction has identified several areas of concentrations of low-income and ethnicity however. A recent article in the Oregonian newspaper on March 13, 2017, identified one neighborhood along High 224 between Milwaukie and Happy Valley (census tract 0215 block group 001) as "severely rent burdened". The article stated that 57% of renters in this neighborhood were paying more than 50% of their incomes for housing costs.

Definition of Multiple Housing Problems Concentration: Any area that has been identified as an urban renewal area by the county is considered an area of high concentration with multiple housing problems.

The North Clackamas Renewal Area (NCRA) formed in 2006 has established neighborhoods that are among the most affordable in the jurisdiction. However, there are long term infrastructure problems that must be addressed. For example, infrastructure related to sidewalk construction and sewer connections. This area contains several census tracts identified as having concentrations of low income and ethnicity. 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 with a large cluster of affordable multi-family housing.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Clackamas County 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. A total of 37,379 persons were living in these high concentrations of minority areas.

Five (5) of the high concentration (HC) block groups are located in the North Clackamas Area. One (1) of the HC block groups is in Milwaukie and two (2) of the HC block groups is in Canby. A total of 13, 855 people live in these areas of concentrated minority and poverty.

Clackamas County Minority Concentration Definition: Any census tract or area that has double (2x) the percentage of the average percentage for that particular ethnicity in the county. In 2015, for Hispanic concentrations any area that had more than 15.4% (double of 7.7% average) was considered a high concentration of Hispanic ethnicity.

Eight percent (7.7%) of Clackamas County residents identified their ethnicity (considered separate from race) as Hispanic or Latino in the 2010 census.

2010 Census data on ethnicity of County residents indicated 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 Low-Income Concentration Definition: Any census tract block group that has a population that is more than 56% low income. Clackamas County has 218 Census Tract Block Groups. 22 of those 218 block groups (10%) have a population that is more than 56% low and moderate income.

What are the characteristics of the market in these areas/neighborhoods?

The communities of North Clackamas and Milwaukie that include the areas of high concentrations are located in urbanized areas with mostly apartment units and rental houses. This urban area is growing rapidly due to the increasing demand for rental units. The City of Canby is a small town in a rural area that has a concentration in a larger census tract of mostly rental units in the northeast corner of the city. Molalla is a small town with modest homes and trailer parks although this community is growing rapidly due the availability of buildable land and the proximity to employment centers. The town is surrounded by huge tracts of forest land, tree farms and agricultural areas.

Are there any community assets in these areas/neighborhoods?

Each community that has a high concentration of ethnicity and low income persons has community assets including public transportation systems, good schools, services and employment opportunities. The one asset that does not seem to be abundant is affordable housing. Another asset is broadband connectivity. The County is planning to use over \$10 million dollars of American Rescue Plan Act federal funding to increase connectivity across rural areas.

Are there other strategic opportunities in any of these areas?

Yes, each community that has a high concentration of ethnicity and low income persons has good schools, good transportation, employment options and access to services via public transportation. Persons in Canby when interviewed regarding fair housing stated that they had moved to Canby to secure employment, good schools for their children and safe housing for their families. Since 2000, the Clackamas County population has grown 24.8% in the past two decades to 423,420. Clackamas County has become more racially diverse in the past 20 years seeing significant growth in the Black (+103%), Asian (+106%) and Hispanic (+107%) populations.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

All households now need internet access for work and school. This fact has been made evident by the COVID Pandemic that required many people to work from home and attend school from home. Low income families and other families without internet access were severely impacted. Schools need to provide "hot spots" and equipment so that all children could access educational resources.

Clackamas County Technology Services Department is securing funding to expand the county's broadband infrastructure — the Clackamas Broadband Exchange — is changing the way our communities educate, respond to emergencies, and conduct business by providing cost-effective, high-speed communications and data transfer.

The County owns the CBX network, which is a buried/aerial cable infrastructure system that has very high bandwidth capacity.

CBX provides high-speed internet to schools, colleges, libraries and more, enabling distance learning applications and other educational services. Currently, CBX provides broadband to: 97 k-12 schools, 3 colleges, 14 libraries, 25 fire stations and 13 state of Oregon Departments. CBX is also provide internet broadband connectivity services the 15 cities in Clackamas County.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Low-income households only option in most cases is to pay \$10 per month for a slower internet service. The County is working with affordable housing providers to explore other options to provide free internet access to low-income households. The County is providing competition by providing Internet services to public institutions throughout the county.

CBX benefits

- CBX provides an estimated \$1,675,000 in annual broadband savings to public institutions.
- A CBX dark fiber network has a direct connection to Denver, Colorado, that avoids all connectivity to the city of Portland. This optimizes resiliency during times of potential emergency.
- Revenues associated with use of the network fund CBX's annual budget. CBX does not use any general fund dollars from Clackamas County for its operations.

In 2010, Clackamas County used a federal grant of \$7.8 million to develop a fiber network in Clackamas County east of the Willamette River. The grant funded a 180-mile network that was constructed from

2010–13. Since that time, CBX has expanded throughout Clackamas County, connecting into areas such as Wilsonville, West Linn, and Lake Oswego. Services have expanded to schools, public agencies, and local commercial service providers.

To date, CBX has more than 360 miles of fiber optic cables that provide 360 fiber connections to 68 different entities.

Fiber broadband provides public agencies and local businesses the foundation for enhancing services, improving product delivery, and gaining a competitive edge in a global marketplace. County website: <https://www.clackamas.us/cbx>

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Clackamas County is experiencing extreme heat and extreme cold annually now rather than every few years. In 2020, Clackamas County had a wildfire that required all residents of two rural towns to evacuate due to fire and smoke. Wildfires are increasing due to drier conditions associated with climate change in our area. Also in 2020, Clackamas County experienced an unusually hot "Heat Dome" effect that required additional cooling centers for vulnerable citizens. Sixty (60) people died in the Portland metro area due to extreme heat.

Clackamas County's 2019 Multi-jurisdictional Natural Hazards Mitigation Plan helps the county plan for actions that can lessen the impact of disasters. The plan allows the county to identify risks associated with natural disasters and work on long-term strategies for protecting people and property. In addition to being a proactive step in reducing risks, having a plan is a condition for receiving certain types of funding from FEMA, the Federal Emergency Management Agency. The funding can help with a variety of projects to mitigate risks, for example retrofitting roads, bridges, culverts and other structures to prevent recurring damage from winter storms or flooding.

website: <https://www.clackamas.us/dm/naturalhazard.html>

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Any housing, including housing occupied by low and moderate income households that is located anywhere near a forested area is vulnerable to forest fires and smoke due to extended wildfire seasons in our area. Low and moderate income homes that are older manufactured homes (trailer parks) may also be vulnerable to temperature extremes of hot and cold.

The 2019 Natural Hazards Mitigation Plan update includes the following changes:

- New information for completed risk reduction projects, plans and improved characterizations of emerging hazards, such as drought, extreme heat and other climate change-related impacts.
- Improve the risk assessment section through an enhanced assessment of lifeline infrastructure systems.
- Increased integration of NHMP information in related county plans and planning documents.
- The County is also forging partnerships with several local watershed councils to promote collaborations between floodplain management, stream, improved natural stream function and habitat restoration.

website: <https://www.clackamas.us/dm/naturalhazard.html>

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The key points of this Strategic Plan:

1. There is a current housing affordability and availability crisis in the Portland metro area that includes Clackamas County.

2. Strategic Plan Priorities

1. Affordable Housing
2. Homelessness
3. Non-housing Community Development

3. Strategic Plan Goals

1. Affordable Housing
2. Housing Rehabilitation
3. Public Services
4. Homeless assistance
5. Public Facilities
6. Community Infrastructure

4. 2022-2026 Assessment of Fair Housing Goals 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.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 48 - Geographic Priority Areas

1	Area Name:	Countywide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The target area is the entire county in both urban and rural areas.

Clackamas County is considered an urban county by HUD.

Most of the population lives in urban areas. Housing in the county is mostly single family residential.

There are 15 incorporated cities within Clackamas County and a large un-incorporated urban area mostly in the northwest corner of the county.

We selected the entire county because our consultation and citizen participation process did not identify any specific target areas within the county.

The community participation process resulted in affordable housing and homeless prevention as needs throughout the county.

We hope to direct more funding to affordable housing developments in high opportunity areas throughout the county.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 49 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Victims of Domestic Violence Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	Geographic Areas Affected	Countywide
	Associated Goals	Affordable Housing Housing Rehabilitation AFH 1 Increase and preserve affordable housing AFH 3 Review Policies to Increase Racial Equity
	Description	HOME funds and CDBG funds will be allocated during the 2022, 2023 and 2024 program years for TBRA Rental Assistance, production of new multi-family housing units, Rehabilitation of existing units and Acquisition of existing affordable housing units if possible.

	Basis for Relative Priority	<p>Through the community several housing needs assessments and the Fair Housing Assessment, respondents consistently placed affordable housing as a top priority.</p> <p>Local initiatives for affordable housing and homeless services funds to 3 counties required Clackamas County to develop a Local Implementation Plan (LIP).</p> <p>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, people with lived homeless 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.</p>
2	Priority Need Name	Homeless Assistance
	Priority Level	High
	Population	<p>Extremely Low</p> <p>Low</p> <p>Families with Children</p> <p>Elderly</p> <p>Chronic Homelessness</p> <p>Individuals</p> <p>Families with Children</p> <p>Mentally Ill</p> <p>Chronic Substance Abuse</p> <p>veterans</p> <p>Victims of Domestic Violence</p> <p>Elderly</p> <p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Persons with Developmental Disabilities</p> <p>Persons with Alcohol or Other Addictions</p> <p>Victims of Domestic Violence</p>
	Geographic Areas Affected	Countywide
	Associated Goals	<p>Homeless Assistance</p> <p>AFH 3 Review Policies to Increase Racial Equity</p>

	Description	The current housing crisis has caused homelessness to be recognized as a brutal problem effecting low-income persons particularly families with children, veterans, victims of domestic violence and persons with mental illness and substance abuse issues. Local governments are concentrating efforts on this wicked problem for vulnerable populations.
	Basis for Relative Priority	The Health, Housing and Human Services Department, Community Development Division has coordinated homeless housing efforts over the last 10 years through the Continuum of Care annual funding application process. The Continuum of Care annual funding level is now over \$3 million per year for services, reporting (HMIS) and rental assistance.
3	Priority Need Name	Non-housing Community Development
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	Countywide
	Associated Goals	Public Services Public Facilities AFH 2 Expand Fair Housing Outreach Education Community Infrastructure
	Description	Public Facilities and Public Improvements were identified as high needs by cities during the community needs assessment process. Public facilities needed include: Homeless facilities, domestic violence services facilities, mental health services facilities, senior centers and abuse/neglected children facilities. Public Improvements needed include: water/sewer improvements, street/alley improvements, curbs and sidewalks, bike and pedestrian paths and street drainage improvements.
	Basis for Relative Priority	Community Infrastructure Improvements, Public Facilities and Public Improvements in support of neighborhoods and housing were identified as high needs by cities during the community needs assessment process or several recent studies.

Narrative (Optional)

Clackamas County is a large and diverse county, covering 1,879 square miles with 15 incorporated cities and towns, as well numerous unincorporated communities. The more urbanized northern and western sections of the county contrast sharply with the rural and frontier nature of the southern and eastern portions of the county.

The Priority Needs that have been identified are not for allocating investment of available resources among different needs.

Public Facilities: These were identified as High Needs for Clackamas County: Homeless Facilities, Domestic Violence (services) Facilities, Mental Health Facilities, Senior Centers and Abused/Neglected Children Facilities.

Public Improvements: These were identified as High Public Improvements Needs for Clackamas County: Water/Sewer Improvements, Street/Alley Improvements, Curbs and Sidewalks, Bike and Pedestrian Paths and, Drainage (street) Improvements.

Public Services: Fair Housing Activities, Homeless Services, Youth Services, Neglected/Abused Children Services, Renter/foreclosure training and Employment/Training Services were identified as High Needs.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Evictions of renters is now at crisis level across the nation due to the Coronavirus pandemic. The State of Oregon has provided CAREs Act rent assistance to over 40,000 households and landlords have received mortgage assistance as well. The current housing crisis in the Portland metropolitan area is affecting low and extremely low income households that are living in older rental units. These older rental units are being sold and or renovated to increase the rental income for investors and property owners. Low income families that are forced to move when a property is sold or renovated are having difficulty locating and affording a new rental unit. HOME funds will be allocated in the 2022, 2023 and 2024 program years for this activity.
TBRA for Non-Homeless Special Needs	Although the current housing crisis in the Portland metropolitan area is affecting low and extremely low income households that are at risk of homelessness, this type of program will not likely be funded between July 1, 2022 and June 30, 2026.
New Unit Production	<p>The current housing crisis in the Portland metropolitan area is affecting low and extremely low income households that are trying to move to a more affordable home. Clackamas County has identified a gap of over 30,000 units of affordable housing needed for low-income residents in 2020. The private housing market has responded to the housing demand by increasing production of luxury homes and apartments that are not affordable for households with low-incomes.</p> <p>Local funds are now being directed to the production of more affordable housing units. The County has a goal of completed 1500 new units in the next 5 years.</p>
Rehabilitation	Low income and disabled residents who own their homes may not be able to maintain the homes or afford to repair the homes to improve accessibility or energy efficiency. The Community Development Division administers a Housing Rehabilitation Program to assist over 35 households per year. THE Housing Rehabilitation Program also works in conjunction with the County's home Weatherization program to reduce the utility expenses for low income households.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	The current housing crisis in the Portland metropolitan area is affecting low and extremely low income households that are living in older rental units and affordable housing projects. These older rental units are being sold and or renovated to increase the rental income for investors and property owners. Fortunately only 1 property, our Apartments with Section 8 assistance has been identified as potentially being lost to low income residents when the Section 8 contract expires sometime between July 1, 2022 and June 30 2026.

Table 50 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Clackamas County Health, Housing and Human Services Department, Community Development Division works closely with the Housing Authority of Clackamas County, the County Behavioral Health Program, the Continuum of Care, non-profit agencies and the local County Social Service agencies to secure and administer many sources of funding for services, programs and rent assistance to benefit low-income residents of Clackamas County.

These expected resources are estimates based on historical funding trends, amounts to be matched and leveraged.

HOME Project-Related Soft Costs

When HOME funds are allocated to an affordable housing project (as opposed to TBRA or CHDO operating), Clackamas County will have the option of charging reasonable and necessary staff and overhead support to the project as project-related soft costs. These may include:

- Processing of applications for HOME funds
- Appraisals required by HOME regulations
- Preparation of work write-ups, specifications, and cost estimates or review of these items if an owner has had them independently prepared
- Project underwriting
- Construction inspections and oversight
- Project documentation preparation
- Costs associated with a project-specific environmental review
- Relocation and associated costs
- Costs to provide information services such as affirmative marketing and fair housing information to prospective tenants
- Staff and overhead costs related any of the above actions

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,203,267	200,000	500,000	2,903,267	8,000,000	The FY 2022 program year is the beginning of the 5-year Consolidated Plan. The expected amount available is based on the assumption that funds will be cut by 2% each year. Program income includes an average of \$200,000 of CDBG program income per year. In 2022, \$500,000 of prior year funds will be expended.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,133,026	100,000	1,000,000	2,233,026	4,000,000	The FY 2022 program year is the beginning of the 5-year Consolidated Plan. The expected amount available is based on the assumption that funds will be cut by 2% each year. The HOME match requirement of 25% will be met either by eligible contributions, computing the value of annual property tax exemptions, or by drawing down the required match amounts from the county's excess HOME match reserve of approximately \$1 million. Prior year funds of \$1,000,000 will be expended in 2022

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	192,180	0	0	192,180	940,000	The FY 2022 program year is the beginning of the 5-year Consolidated Plan. The expected amount available is based on the assumption that funds will be cut by 2% each year

Table 51 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG Program: Resources reasonably expected to be made available to supplement CDBG funds include local matching to be contributed by project sponsors. Matching contributions (cash or in-kind) equivalent in value to a minimum of 20% of the project cost are required by County policies. It is anticipated that funding available to finance community development activities from local matching sources will total at

least \$2,000,000. CDBG anticipates approximately \$200,000 of program income per year from the Housing Rehabilitation program loan repayments and \$500,000 of prior year funds will support annual projects.

The **Continuum of Care application** process will renew at least \$3,000,000 of funding annually for homeless services, programs and rent assistance for homeless individuals and families. In 2021 CoC was eligible to apply for an additional \$885,387 of funds for a Youth Homelessness Demonstration Projects. In 2020 HUD awarded the Clackamas Continuum a total of \$3,791,435 which includes additional funding due to increased Fair Market Rent (FMR) rates and additional funds for the Housing Our Heros homeless veterans and families housing assistance program. The total request for 2021 will be \$4,386,799.

HOME Program Income

HOME Program Income (PI) is generated from the repayment of HOME loans that the county has made to affordable housing projects. As provided for in the 2016 HOME Interim Rule, Clackamas County will retain HOME PI that is received during the program year, and allocate it to a specific project or projects in the subsequent program year. For the program year ending June 30, 2022, the county anticipates that it will retain approximately \$70,000 of HOME PI, and will allocate the PI to a HOME multi-family housing project in the upcoming program year.

HOME Match Funds: The HOME match requirement of 25% will be met either by eligible contributions, computing the value of annual property tax exemptions, or by drawing down the required match amounts from the county's excess HOME match reserve of approximately \$1.3 million

ESG funds will be matched using private donations, local and state homeless prevention funds (EHA).

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Currently, the County is using publicly owned land for a homeless Veterans Village as a transitional housing facility. The County owns other parcels of land that are being assessed for viable homeless services or transitional housing facilities.

Discussion

The Health, Housing and Human Services Department, Community Development Division will continue to partner with the Housing Authority of Clackamas County, the County Behavioral Health Program, the County Health Centers, the Continuum of Care, non-profit agencies, for profit

housing developers and the local County Social Service agencies to explore new programs, services and financial resources for programs and services that benefit our low-income and special needs residents.

Anticipated Resources amounts are based on anticipated funding levels, anticipated program income, prior year funds carried forward and expected matching funds on individual community projects.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CLACKAMAS COUNTY	Government	Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Jurisdiction
Housing Authority of Clackamas County	PHA	Homelessness Non-homeless special needs Planning Public Housing Rental public facilities public services	Jurisdiction
CLACKAMAS WOMEN'S SERVICES	Non-profit organizations	Homelessness Non-homeless special needs Planning Rental public services	Region
Clackamas County Children's Commission	Non-profit organizations	Homelessness Non-homeless special needs Rental public services	Jurisdiction
Clackamas Service Center	Non-profit organizations	Homelessness Planning	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
NORTHWEST HOUSING ALTERNATIVES	Non-profit organizations	Homelessness Non-homeless special needs Ownership Planning Rental public facilities public services	Region
Northwest Family Services	Non-profit organizations	Homelessness Non-homeless special needs Planning Rental public services	Region
Parrott Creek Child & Family Services	Non-profit organizations	Homelessness Non-homeless special needs Planning public facilities public services	Jurisdiction
Cascade AIDS Project	Non-profit organizations	Homelessness Non-homeless special needs Planning public services	Region

Table 52 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Clackamas County has a Department of Health, Housing and Human Services (H3S) that is the primary institutional delivery system for services for low-income persons and families, homeless persons and persons with disabilities. H3S provides and contracts with providers to offer a number services including: energy assistance, veteran outreach, aging and disability services, community primary care and dental care clinics, homeless housing, public housing, behavioral health services, tenant rights training, employment training, behavioral health crisis walk-in clinic, alcohol and drug addictions counseling, homeless Continuum of Care funding and services coordination, rental assistance programs and program planning services.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance			
Rental Assistance	X	X	
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		X
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
Other			

Table 53 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Persons with HIV/AIDS are referred to the Cascade Aids Project as the provider of HIV/AIDS specific services in the region. Services targeted to homeless person are provided through the Continuum of Care providers including the Housing Authority of Clackamas County, Social Services Division and non-profit providers including 2 providers of services to survivors of domestic violence, one provider of services to homeless youth, public school homeless youth liaisons.

The Social Services Division also coordinates homeless services with several faith based agencies that provide meals, seasonal warming shelters and emergency shelter for homeless families. The Homeless Continuum of Care has designed and implemented a coordinated Housing Access system to better track the number of persons requesting homeless assistance as well as which persons were able to receive services.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The strength of the H3S service delivery system is that the county can coordinate many services to make the best use of any available funding to provide services. Since the county is the major provider of limited federal and state resources. The county is actively recruiting new service providers and allocating funds to build capacity of the non-profit provider network through the newly Metro-funded Supportive Housing Services for homeless and vulnerable populations within our urban growth boundary.

The Continuum of Care has been able to effectively re-allocate funds to provide more rapid re-housing services and veteran housing program to respond to annual renewal application requirements. New Continuum of Care projects and funding have been awarded to provide services to homeless youth as well as rental assistance for homeless veterans and their families.

The gaps in services continues to be a lack of transitional and permanent supportive housing facilities to house homeless persons and their families. The lack of facilities is due to several factors including community resistance to facilities, lack of funding to build and operate facilities and lack of ongoing financial support of facilities and services for low-income, disabled and homeless persons. The recent Metro funding will begin to address these issues. The current housing crisis has increased rents thereby reducing the number of persons that can be housed with the same levels of funding.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

One strategy is to develop a county Strategic Housing Plan to direct limited resources to the most effective housing solutions for homeless persons, their families and affordable housing funding options. The Health, Housing and Human Services Department is now re-structuring to develop a Housing Services and Development Division to bring the public housing authority and several housing related programs into one division to allow for better coordination and planning.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2022	2026	Affordable Housing	Countywide	Affordable Housing	CDBG: \$500,000 HOME: \$1,000,000	Rental units constructed: 300 Household Housing Unit Rental units rehabilitated: 100 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted
2	Housing Rehabilitation	2022	2026	Affordable Housing Non-Homeless Special Needs	Countywide	Affordable Housing	CDBG: \$1,500,000 HOME: \$0 ESG: \$0	Rental units rehabilitated: 150 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit
3	Public Services	2022	2026	Non-Housing Community Development	Countywide	Non-housing Community Development	CDBG: \$1,000,000 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Assistance	2022	2026	Homeless	Countywide	Homeless Assistance	CDBG: \$500,000 ESG: \$940,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Housing for Homeless added: 300 Household Housing Unit
5	Public Facilities	2022	2026	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Non-housing Community Development	CDBG: \$2,000,000 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7500 Persons Assisted
6	Community Infrastructure	2022	2026	Non-Housing Community Development	Countywide	Non-housing Community Development	CDBG: \$1,000,000 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
7	AFH 1 Increase and preserve affordable housing	2022	2026	Affordable Housing	Countywide	Affordable Housing	CDBG: \$1,000,000 HOME: \$1,000,000	Other: 1 Other
8	AFH 2 Expand Fair Housing Outreach Education	2022	2026	Non-Housing Community Development	Countywide	Non-housing Community Development	CDBG: \$500,000 HOME: \$0 ESG: \$0	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	AFH 3 Review Policies to Increase Racial Equity	2022	2026		Countywide	Affordable Housing Homeless Assistance	CDBG: \$500,000 HOME: \$0 ESG: \$0	Other: 1 Other

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	<p>CDBG, HOME funds and local funds will assist in the development of new affordable housing units, preservation of existing affordable housing and Tenant Base Rental Assistance. HOME funds allocated to Clackamas County have been reduced each year due to federal budget cuts. These goal estimates are based on the assumption that HOME funds will not be reduced any further.</p> <p>An estimated 300 new units (60 per year) of affordable housing will be built including funding from HOME funds between July 1, 2022 and June 30, 2027.</p> <p>An estimated 100 units of affordable housing (20 per year) will be preserved with HOME funds between July 1, 2022 and June 30, 2027.</p> <p>An estimated 100 households (20 per year) will be assisted with Tenant Base Rental Assistance HOME funds between July 1, 2022 and June 30, 2027.</p>

2	Goal Name	Housing Rehabilitation
	Goal Description	<p>New affordable housing and maintaining affordable housing were both identified as high priorities during the community needs assessment process through several studies from 2018 through 2021.</p> <p>The Housing Rehabilitation Program and Weatherization program assists low-income homeowners and low-income renters with grants and low cost loans to improve accessibility to their homes, reduce energy consumption and maintain long term affordability of their homes.</p> <p>An estimated 250 households (50 per year) will benefit from housing rehabilitation services between July 1, 2022 and June 30, 2027.</p>
3	Goal Name	Public Services
	Goal Description	<p>An estimated 10,000 persons (2,000) per year) will benefit from public services between July 1, 2022 and June 30, 2027.</p> <p>Public services needs were identified through several studies, community surveys, public housing resident surveys, public meetings with community groups and, community engagement efforts between 2018 and 2021.</p> <p>Fair Housing Activities, Homeless Services, Youth Services, Neglected/Abused Children Services, Renter/foreclosure training and Employment/Training Services were identified as High Needs</p>
4	Goal Name	Homeless Assistance
	Goal Description	<p>Homeless assistance is provided through Emergency Solutions Grants and Continuum of Care funding and services. The estimated goals are based on the assumption that annual funding will remain at current year levels.</p> <p>An estimated 1750 homeless low income households (350 households/875 persons per year) will be assisted with emergency shelter, transitional housing or rapid re-housing to stabilize their households to secure additional resources, permanent housing or permanent supportive housing between July 1, 2022 and June 30, 2027.</p>

5	Goal Name	Public Facilities
	Goal Description	<p>An estimated 7500 persons (1500 per year) will benefit from public facilities improvements between July 1, 2022 to June 30, 2027 (5 program years).</p> <p>Public Facilities Needs were identified through several studies from 2018 through 2021 including community surveys, surveys of public housing residents and in community engagement meetings with community groups.</p> <p>These were identified as High Needs for Clackamas County: Homeless Facilities, Domestic Violence (services) Facilities, Mental Health Facilities, Senior Centers and Abused/Neglected Children Facilities.</p>
6	Goal Name	Community Infrastructure
	Goal Description	Community infrastructure including pedestrian improvements in low-income neighborhoods, ADA accessible sidewalks, street improvements and sewer and waterline improvements in low-income neighborhoods.
7	Goal Name	AFH 1 Increase and preserve affordable housing
	Goal Description	<p>Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County</p> <p>Strategy 1A: 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. Leverage funds to add 1500 units. HACC development team consult/assist small cities interested in developing affordable housing. Continue to reposition HACC public housing portfolio to add additional units and refurbish existing units.</p> <p>Strategy 1B: Maximize the number of households receiving long term and short term rental assistance from local, state and federal programs. Streamline voucher processes at HACC to ensure the shortest possible timeline between application to lease up. Develop decision making tree for determining the best voucher program to meet household needs. Apply for NOFA's for new and increasing HUD rental assistance.</p> <p>Strategy 1C: 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. Track affordable housing zoning changes in Clackamas County. Provide information to County Leaders, County Department leaders and affordable housing advocates.</p>

8	Goal Name	AFH 2 Expand Fair Housing Outreach Education
	Goal Description	<p>Goal 2: Expand fair housing outreach, education, and enforcement.</p> <p>Strategy 2.A: Increase fair housing education for staff, landlords & community partners. Host annual fair housing trainings for staff. Host annual fair housing related events/trainings in cooperation with landlords and/or other community partner service providers.</p> <p>Strategy 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. HACC to participate in a Regional Fair Market Rent research projects to review the accuracy of payment standards for the Metro region as needed.</p> <p>Strategy 2.C: Work in collaboration with partners to enforce fair housing law. Develop an access testing program in cooperation with landlords, the Fair Housing Council of Oregon and the Oregon Law Center to test equity in access. Implement the program when COVID -19 risks levels allow.</p> <p>Strategy 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. Continue to support and staff the Housing Rights and Resource line. Ensure that clients can report any housing discrimination issues confidentially. Measure number and types of assistance calls received and client intakes conducted.</p>

9	Goal Name	AFH 3 Review Policies to Increase Racial Equity
	Goal Description	<p>Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.</p> <p>Strategy 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. Establish a process to review all HACC processes, procedures, workflows and documents used by the Housing Authority with an accessibility (language & use of plain language), trauma-informed and reviewed with a racial equity lens on a regular ongoing basis.</p> <p>Strategy 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. Analyze program performance in advancing racial equity on a no less than annual basis. The desired goal is that at no time should racial distribution of population served be less than census distribution of Clackamas county population. Create & adopt an inclusive tenant screening criteria process with minimal barriers allowable in housing programs. Work with landlords to reduce barriers in their screening for voucher recipients on an ongoing basis. Measure success rates by reviewing the expiration of vouchers with a lens for racial disparity. At no time should expirations exceed per population served be at a higher rate than the overall expiration rate. Review equity data with the County Diversity Equity and Inclusion Office yearly and incorporate strategies to advancing racial equity into programs, as needed.</p>

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

In the 2022 through 2026 program years (July 1, 2022 to June 30, 2026), using a combination of CDBG, HOME local funds and Housing Authority funds the H3S department will provide additional affordable housing by:

- Housing Authority Housing Development Metro Goals: 1500 new units:
- Rental units constructed: 300 Household Housing Units
- Rental units rehabilitated: 100 Household Housing Units
- Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

There is no need to increase the number of accessible units at the Housing Authority of Clackamas County public housing units. There is no Section 504 Voluntary Compliance Agreement.

In 2022-2023, HACC will review the feasibility of submitting a Section 18 Demolition and/or Disposition, a Rental Administration Demonstration (RAD), a Section 18/RAD blend application, Choice Neighborhoods, or Hope VI for Clackamas Heights, a 100-unit Public Housing property located at 13900 S. Gain St., Oregon City, OR 97045. If an application is submitted and approved, HACC will relocate all 100 households following the approved Relocation Plan and with the assistance of Section 8 vouchers.

In late 2018, HACC submitted a RAD application for Hillside Park, a 100-unit Public Housing property located in Milwaukie. The application was approved and HACC received the CHAP on April 26, 2019. In 2020, HACC requested a withdrawal of the CHAP because HACC believes the development is better suited for disposition under Section 18. In 2018-2019, HACC embarked on a Master Planning process that envisioned the redevelopment of the Hillside Park public housing community. The planning process engaged residents and community members, who helped develop a vision for a vibrant mixed-use, mixed-income community. The design preserves and rebuilds existing affordable housing at the site, while creating opportunities for expanded housing choice and type. In late 2020, HACC submitted a land use application to the city of Milwaukie seeking to rezone the site to allow for increased density and mixed-use housing. In late 2021, the City of Milwaukie formally approved HACC's land use application. In 2020, HACC completed an environmental review conducted under 24 CFR part 58 and the RRFO and AUGF were approved by HUD. In 2022, HACC plans to submit a Section 18 Demolition and/or Disposition application for the project. If the application is approved, HACC will relocate all 100 households following the approved Relocation Plan with the assistance of a relocation contractor and Section 8 vouchers.

In 2019, Metro Affordable Housing Bond funds were used to acquire a facility located at 18000 Webster Road in Gladstone. Once rehabilitated, the Webster Road redevelopment project will provide 48 units of housing for homeless and very low income individuals, including 12 dedicated PSH units. In 2019-2020, HACC participated in the Permanent Supportive Housing (PSH) Development and Operational Team Technical Assistance Pilot Cohort sponsored by Oregon Housing and Community Service (OHCS). In 2020, HACC was successfully awarded \$2.4 MM in PSH capital funding to support the project. This project is supported by Metro Affordable Housing Bonds, PSH capital and services funding, 48 PBVs, HOME funds, 4% LIHTCs, and Tax-Exempt bond financing. The project closed on construction financing in June 2021 and renovation is currently underway. Construction completion is anticipated in June 2022. Conversion to permanent financing is anticipated to occur in early 2023.

Activities to Increase Resident Involvements

HACC encourages Public Housing residents to engage in management through a Resident Advisory Board (RAB). RAB membership is comprised of public housing and Section 8 Housing Choice Voucher (HCV) leaders that represent residents served by HACC. The RAB convenes not fewer than two times per year to develop, approve, review and evaluate HACC's Annual Plan. The RAB is also consulted for input and approval of any significant amendment or modification to the Annual Plan. A member of the RAB has a permanent seat on the County's Housing Advisory Board.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not Applicable to Clackamas County.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Local land use policies tend to limit affordable housing projects and multifamily housing developments to specific areas of the city usually inside the urban growth boundary. The current pandemic and the rapidly increasing cost of real estate and rents has made the Portland metro area including urban and rural Clackamas County, one of the least affordable metro areas in the country. More and more people are on the verge of losing their place to live. The majority of resident feedback during Assessment of Fair Housing 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. 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”). Clackamas will be evaluating the feasibility and the various options for implementing inclusionary zoning within the county.

- **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.

The County is also in process of substantially revising the Land Use Comprehensive Plan, Chapter 6 Housing, in response to HB2001 and other housing market demands. The Comprehensive Plan housing zoning code only applies to urban areas that are unincorporated or outside of city boundaries.

- **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.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In 2018, regional voters approved a \$652.8 million Metro Affordable Housing Bond for the creation of 3,900 affordable housing units within the urban growth boundary. The bond allows the Metro region the opportunity to invest in the development of new housing resources for some of its most vulnerable and historically marginalized residents.

Recognizing the need and opportunity throughout the region, bond revenue is distributed based on assessed value of each of the three counties within the Metro district. Bond revenues dedicated to Clackamas County are \$116,188,094. As an implementing jurisdiction of the Metro Bonds, all bond resources allocated to Clackamas County will run through HACC. The goal for HACC is to support the development of at least 812 units of affordable housing throughout the eligible Metro boundary within the county. This support may include direct acquisition, development, and/or ownership by HACC or involve partnering with non-profit or for-profit developers to support the development of units throughout the eligible Metro boundary. HACC's strategy for reaching this goal is outlined in the 2019 Clackamas County Local Implementation Strategy (LIS).

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Many of the plans listed here are coordinated by the Homeless Continuum of Care service providers.

Households with dependent children: Locally funded HomeBase (RRH and homelessness prevention) expanded last year, reaching 459 people & plans to increase capacity next year. The locally funded Bridges to Housing Program stabilizes housing for high need homeless families serving 38 families & 63 children last year. Through the Rent Well-RRH project 25 families from the streets/emergency shelter will be assisted.

Survivors/Victims of domestic violence: The CoC includes a TH and a PSH project focused on domestic violence survivors and their families. This provider operates an ESG funded DV emergency shelter which recently doubled its beds, a homelessness prevention program, Beyond Shelter, and the newly opened Family Justice Center. The projects involve a wide range of on-site services from over 12 public safety and services agencies, funded by more than 24 public and private entities. Victims in Clackamas County can now access an advocate, plan for their safety, talk to a police officer, meet with a prosecutor, receive medical assistance, file a protective order in a video court, receive information on shelter and get help with transportation—all in one location on a drop-in basis.

Unaccompanied youth: Parrott Creek Family Services now operates the CoC TH for youth 16- 21 funded with CoC, ESG, local government & private funds. HomeSafe is a CoC TH for pregnant and parenting youth 6 – 21 funded with CoC, local and state grants. Host Homes is funded with local, state and private grants. The program is for 16- 18 year olds attending school houses up to six unaccompanied youth with families.

Persons who routinely sleep on the streets or in other places not meant for human habitation: With CARES Act ESG and CDBG funding Clackamas County has greatly expanded the homeless shelter and rapid re-housing services programs. Clackamas County Social Services Division (SSD) has a range of services for persons sleeping on the streets or in other places not meant for human habitation. These services are provided through contracts or directly by SSD staff. Two major service centers (Clackamas Services Center and Father's Heart) provide hot meals, clothing, medical services, and severe weather shelter, and are close to where many unsheltered homeless reside. Several smaller agencies also provide basic needs and outreach to homeless on the streets and places not meant for habitation. The Clackamas Service Center will be expanded using CARES act funds to bring more services and

Compassion events, similar to Project Homeless Connect, are held throughout the year to provide a “one stop” for basic services, such as food, clothing, medical care, veterans’ services and housing options. Severe weather winter shelters are now provided annually in a rural areas with a significant homeless camping populations.

Homelessness among veterans: Housing Authority of Clackamas County has housed 25 homeless veterans using VASH vouchers. The SSD Veterans Services Office conducts veteran outreach with free medical screenings, warm clothing, information on compensation and other veterans' benefits, employment, housing, counseling and other services. Clackamas County is part of a new SSVF grant and is providing office space and supplemental rental assistance using state funds for a nonprofit provider of outreach, homeless placement and homeless prevention for veterans. This grant has streamlined access to the regional Grant Per Diem program for vets who are working on permanent housing placement either through VASH, SSVF or other programs. Clackamas County is developing more housing units targeted to homeless veterans.

Addressing the emergency and transitional housing needs of homeless persons

In recent years, Clackamas County has stepped up its housing and services efforts and investments to address our growing homeless population. But without the resources necessary to increase those responses, the social and economic forces that put so many people on our streets — and then keep them there — have continued to outpace our efforts.

With the passage of Metro Ballot Measure 26-210, the Tri-County region has a rare opportunity to confront the true scale of this crisis. By making unprecedented investments that center racial equity, leverage existing systems, and provide the flexibility necessary to offer truly participant centered approaches to meeting the needs of our un-housed neighbors, we can reduce rates of chronic and short-term homelessness, and racial disparities.

Measure 26-2101, also known as the Supportive Housing Services Measure, adds a regional income tax on high-earning households and a regional profit tax on businesses grossing more than \$5 million. The Measure is projected to generate as much as \$248 million a year across the Metro region, once fully implemented. Of that, approximately \$51 million a year is expected to come to Clackamas County.

With that new funding, governments across the Tri-County region will be able to grow and sustain the critical interventions that actually end homelessness, including rent assistance and other support services vital to helping keep people housed, while also investing in emergency options like shelter.

The largest share of funding raised by the Measure will address chronic homelessness. 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. As part of its responsibility for implementing the Measure, Metro requires each of the three counties to develop a high-level Local Implementation Plan that centers racial equity, is informed by a comprehensive community engagement process, and

identifies investment priorities for rent assistance and supportive services. Metro also requires that each plan include detailed accountability metrics.

Clackamas County developed its Local Implementation Plan (hereafter “this Plan” or “the Plan”) with guidance from the Plan’s advisory body, the newly formed Supportive Housing Services Steering Committee (the Committee). The Committee includes voices from local government, service providers, people with lived experience, faith organizations, Communities of Color, and business groups.

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 also shaped the Plan.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The Clackamas County local Metro Supportive Housing Services (SHS) Program attempts to correct years of discriminatory practices and disinvestment and focuses on addressing housing instability for people experiencing homelessness across the Tri- County region, with a call to share responsibility and strengthen coordination between the three counties. Clackamas, Multnomah and Washington counties recognize that a regional approach is required to effectively address services and resource gaps to meet the needs of these priority populations. The counties cannot design responses based on local data alone, which are reflections of traditionally siloed systems developed when homelessness and housing crises were more localized and less severe. We know that people accessing homeless system services “often travel to meet their housing, service and employment needs, and the data show the impact on communities in the region”.

The three counties have agreed that enhancing and expanding local systems of care to more equitably address unmet needs across the region, particularly in supportive and affordable housing, is of the utmost importance. The SHS Measure initially divides program funds between the three counties as follows: Multnomah County (45.3%), Washington County (33.3%) and Clackamas County (21.3%). The counties will develop and enhance local homeless systems care that address the need of priority populations in a similarly proportionate manner.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving

assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

These discharge plans have been confirmed through the Continuum of Care application and planning process.

Foster Care: The Oregon Department of Human Services (DHS), dictates the Foster Care Discharge Policy in which the County actively participates. DHS refers willing children to a Continuum of Care provider for a Life Skills/Transition Readiness Assessment. This results in: 1. Identification of resources and linkages needed to assist the child in transitioning to independent living, including life skills training, housing subsidies, college tuition, and health insurance and 2. Preparation of an individualized Comprehensive Transition Plan which must be approved by a Family Court Judge every 6 months until the child is successfully transitioned to independent living.

Youth can access Chafee rental subsidies to help them secure an apartment. They can secure tuition-free access to a state college along with Chafee grants to assist with room and board. Youth with developmental disabilities and/or mental illness exiting the foster care system continue to receive an array of services including options such as adult foster care and supported housing that are based on unique client needs. Each option is designed to ensure that youth exiting the foster care system are not routinely discharged into homelessness.

Health Care: The discharge planning for low-income and disabled people has historically resided with the State through the Medicaid program. With the advent of the Affordable Care Act (ACA) and the expansion of Oregon's Medicaid program, discharge planning is shifting to local control. All Medicaid providers are joined in Coordinated Care Organizations (CCOs) covering specific geographic areas. The CCOs integrate physical, mental and dental health services. The ACA Medicaid expansion has been structured to align the financial incentives with clinical outcomes/housing status of patients. This has begun to persuade hospital systems and health care providers to plan and act outside their silo, to begin discussions with CoCs about effective liaison and resource sharing.

Mental Health: The Discharge Policy in place for persons being discharged from a mental health facility is ensured by Clackamas County Behavioral Health Department (CCBH). As part of Health Share, the area's Medicaid Coordinated Care Organization, CCBH has both financial and clinical incentives to ensure that no county residents are discharged from a psychiatric hospital without housing and services. In addition, Oregon is under an U. S. Dept. of Justice 4 year plan to provide better community outcomes for people with mental illness. Specific mandates are subcontracted by the State to CCBH. The local Discharge Policy, which is monitored and enforced by the State, requires all adults leaving a psychiatric hospital be housed consistent with their level of care needs and personal wishes.

Corrections: The purposeful effort to structure successful community re-entry for inmates is a local mandate spearheaded by the Clackamas County Sheriff's Office (CCSO) which participates on the CoC governing board. Because community safety is its #1 priority, CCSO promotes post-discharge services

with housing to reduce recidivism. Likewise, the Clackamas County Behavioral Health (CCBH) is a provider in the local Medicaid program, Health Share. CCBH understands that successful re-entry will reduce incidence and cost of ER visits and hospitalization.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

These actions are coordinated through the Housing Rehabilitation Program.

Clackamas County contracts with a professional firm to provide lead hazard evaluation services at no cost to the owners and buyers participating in its housing rehabilitation and homebuyer programs. When such hazards are discovered, they are addressed in a manner consistent with procedures approved by HUD, the State Health Division and the Department of Environmental Quality. However, the County does not anticipate using HOME funds for its housing rehabilitation programs in the next year. The HOME funded Homebuyer program is discontinued. The HOME funded project will be new construction and will not involve lead-paint hazards.

How are the actions listed above related to the extent of lead poisoning and hazards?

The extent of the lead poisoning and hazards will not have any affect on the plan of action. The county's Housing Rehabilitation Program will continue to test homes that are identified as having a high probability of containing lead hazards due to the age of the home. The Housing Rehabilitation Program is more likely to provide services to older homes than newer homes with no lead hazards.

How are the actions listed above integrated into housing policies and procedures?

The Housing Rehabilitation Program has an internal lead-based paint hazards specialist (Housing Rehab Advisor J.T.) that participates in a number of activities aimed at educating the public and addressing lead based paint hazards. Activities of the lead paint hazard reduction specialist may include:

- Participating in the Oregon Childhood Lead Poisoning Elimination Plan.
- Promoting “Lead Safe Work Practices” training for contractors.
- Educating homeowners in lead-based paint hazards.
- Offering lead hazard evaluations of properties for applicants of the Clackamas County Housing Rehabilitation Program.
- Offering lead hazard reduction through our partnership with the regional Portland Lead Hazard Control Program Grant.
- Offering blood lead testing through the Portland Lead Hazard Control Program.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Community Development Division (CDD) coordinates efforts with the Housing Authority of Clackamas County (HACC) and the Social Services Division (SSD) to reduce the number of households below the poverty line. Both HACC and SSD provide homeless housing and services. SSD anti-poverty activities include:

- Participation in and staffing of the Continuum of Care in Clackamas County as well as the Continuum of Care Steering Committee (Governing Board) and the Homeless Policy Council.
- Coordination and maintenance of liaison relationships with McKinney Vento funded homeless liaisons that support the educational success of homeless children. These include each of the School Districts in the county, all Clackamas Educational Service District offices, and the State of Oregon Department of Higher Education.
- Contracting with a community based organization for a Homeless Student Success Project that enhances the capacity of the homeless liaison at the highest poverty school district in Clackamas County.
- Participation as one of the four lead agencies on the regional steering committee for the Rent Well tenant education program.
- Participation in the operations of the Janssen Transitional Housing Project (JTHP). SSD currently provides case management for the families living at Janssen. This HUD funded project, sponsored by the Housing Authority of Clackamas County, has been in operation for more than 20 years. JTHP provides seven (7) transitional housing units, intensive and comprehensive case management, flexible assistance to support residents increasing their income and housing stability, and other supportive services for homeless families with children.
- Maintain the Housing Rights and Resources Program which responds to the general public regarding emergency housing, housing discrimination, landlord-tenant concerns, low-cost housing, rent assistance and a variety of other housing-related issues.
- Maintain a contractual relationship with Legal Aid Services of Oregon and the Fair Housing Council of Oregon to support the delivery of Fair Housing services to Clackamas County residents. This contractual relationship hastens service delivery for people experiencing potential discrimination and/or fair housing violations.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Clackamas County Community Development Division (CDD) works in conjunction with the Housing Authority of Clackamas County, the Social Services Division, the Behavioral Health Division, Community Health Centers and community non-profit housing providers and private non-profit social services providers to address obstacles to meeting underserved needs, foster and maintain affordable housing, develop institutional structure, encourage public housing residents to become more involved in management and encourage public housing residents to attain home ownership.

In 2022 through 2024 CDD plans to fund several affordable housing projects, an employment training program, a fair housing rights and information program, homeless prevention and rapid rehousing services, and a youth mentoring program for youth in public housing.

According to the Area Agency and Aging 2021-2025 plan: The county's fastest growing population segment is adults age 60 years and older. Between 2010 and 2018, the number of residents age 60 years and older increased by 40 percent or 28,202 people and accounted for 80 percent of the overall population growth in the county. While the overall percentage of county residents living below the federal poverty line has declined since 2010, the percentage of residents aged 60 and older living in poverty has increased by 68 percent from 4,139 to 6,920 in 2018. Similarly, while the number of people with a disability has increased by just 281 people in the county overall since 2010, for those aged 65 and older the number has increased from 18,717 to 22,071; 32 percent of those 65 years or older are living with at least one disability.

While 92.2 percent of residents age 60 years and older in the county are white, the racial and ethnic diversity in the county is steadily growing in all population segments. This is illustrated within the older adult population by the growth in the number of residents 65 years and older who speak a language other than English at home, which increased by 47 percent between 2010 and 2018. The largest increase occurred in those who speak Indo-European languages at home, including Russian, which increased from 1,275 residents in 2010 to 2,164 in 2018.

-

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The following standards and procedures will assure long-term compliance with federal program requirements:

1. Community participation mailing list is maintained to encourage involvement of community participation in public meetings and community surveys for the Consolidated Planning process.
2. CDBG Project proposals are evaluated to ensure compliance with a National Objective before award. Project Agreements reference 24 CFR 570.505 specifying requirements for maintaining eligible use for the life of the project.
3. Agreements for public facilities in excess of \$25,000 include a provision for continued service primarily to low and moderate persons for between until 5 and 20 years after project completion.
4. Solicitations for contractors indicate the County's intent to promote Equal Employment opportunities in all program activities. Contractors for all construction work exceeding \$10,000 must submit documentation of equal employment opportunities afforded to subcontractors.
5. Construction contracts are awarded and managed directly by Clackamas County to assure HUD Labor Standards compliance.
6. Fair Housing Information & Referral program is funded to promote equal housing opportunity and assist with complaints regarding housing discrimination. AFH Goals to be monitored in CAPER.
7. All project budgets, transactions, reimbursements through HUD's IDIS and project status are recorded in a project tracking data base. CDD staff monitor HOME-assisted Rental Housing to ensure that owners are managing projects in compliance with the HOME regulations. Monitoring activities include both desk and on-site monitoring specifically: 1. Affordable rental housing requirements at 24 CFR 92.252, 92.253, 92.351; 2. Specific provisions of the HOME rental project agreement; and, 3 Inspection and record-keeping requirements at 24 CFR 92.504 and 92.508.

During on-site inspections at least 25 percent of HOME-assisted rental units are inspected. Checklists used include: 1. Facility must be maintained in compliance with the property standards at 24 CFR 92.251. An inspection form is used for this purpose. 2. Policies and procedures must comply with the HOME regulations and the provisions of the HOME Rental Housing Agreement; and 3. Tenant files including leases, tenant incomes, rents and utility allowances must be current, complete, accurate and

in compliance with the HOME regulations. Frequency of on-site inspections of HOME-assisted rental housing projects is not less than; every 3 years for projects of one to four units, every 2 years for projects with five to 25 units, and annually for projects with 26 or more units. Homebuyer monitoring ensures beneficiaries of direct homebuyer assistance continue to occupy the home as their primary residence as required by 24CFR 92.254.

ESG Sub-recipient agreements include: an annual budget, including proposed match; an annual audit; certification of homeless or formerly homeless person(s) participation in policymaking; and retention of non-financial records for 4 years. Sub-recipient monitoring has 3 stages: Stage 1 involves monthly review of invoices to ensure expenditures do not exceed funding cap limitations, and that each invoice is billed to the correct eligibility category, Stage 2 involves quarterly review of performance and, Stage 3 involves on-site monitoring. Monitoring is conducted on a 3-year cycle with one sub-recipient reviewed each year.

AFH Goals: H3S staff will assess progress on all AFH Goals at least 3 times per year and report annually in CAPER performance report.

Appendix A: Public Comments

1	<p>Data Source Name</p> <p>Consolidated Plan Table 10</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>U.S. Census Bureau</p>
	<p>Provide a brief summary of the data set.</p> <p>Data set from Census Bureau CHAS and CON Plan Table 10</p>
	<p>What was the purpose for developing this data set?</p> <p>Since no other data is available for low income households with children present, Clackamas County uses the assumption that Small Related Households paying more than 50% of their incomes (Cost Burden >50%) as listed in Table 10 is representative of families with children</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>2012</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>Since no other data is available for low income households with children present, Clackamas County uses the assumption that Small Related Households paying more than 50% of their incomes (Cost Burden >50%) as listed in Table 10 is representative of families with children</p>
	<p>Describe the total population from which the sample was taken.</p> <p>Since no other data is available for low income households with children present, Clackamas County uses the assumption that Small Related Households paying more than 50% of their incomes (Cost Burden >50%) as listed in Table 10 is representative of families with children</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Since no other data is available for low income households with children present, Clackamas County uses the assumption that Small Related Households paying more than 50% of their incomes (Cost Burden >50%) as listed in Table 10 is representative of families with children</p>

Appendix A: Public Comments

Appendix A: Public Comments

Clackamas County Community Development Public Meeting Summary

6:00p.m. Wednesday, October 27, 2021

Online via Zoom meeting

Oregon City, Oregon

In Attendance:

Peter Tompkins-Rosenblatt, Northwest Housing Alternatives
Jennifer Harvey, Children, Families and Community Connections
Scott Vancouvering, Children, Families and Community Connections
Emily Murkland, Clackamas County Sustainability & Solid Waste
Simon Fulford, Parrott Creek Children and Family Services
Brigitte Rodriguez, El Programa Hispano Católico
Devin Ellin, Housing Authority of Clackamas County
Angel Sully, Housing Authority of Clackamas County
Bayley Boggess, Housing Authority of Clackamas County
Stephanie Basalyga
Scott Hoelscher, County Transportation and Development
Corrie Etheridge, Northwest Family Services
Jennifer Much Grund, Clackamas County Social Services
Kalena Sharp, True Housing/Parrott Creek
Greg – County Library District
Oz – Library District
Mark Sirois, Manager, Community Development Program

Mark Sirois, Community Development Division, opened the meeting at 6:00p.m. by thanking everyone for attending. Mark explained that the public meeting was a chance for community members to learn about the Community Development Program and the funding that HUD provides to Clackamas County. The meeting also provides an opportunity to get information from citizens on the specific community needs and discuss potential future housing and community development projects in the County. Mark invited everyone to attend the additional meetings on November 16th, April 8, 2022 and May 6th 2022 with the Board of County Commissioners to get approval to submit to HUD.

Mark encouraged attendees to sign in with name and agency using the chat function of the online platform.

Mark gave a slide show presentation about the CDBG Application and Consolidated Planning process to develop a 5 year plan. The 2022 plan is the first year of the new 5 year plan. This new funding cycle will begin again in November 11th when applications for CDBG funding will

Appendix A: Public Comments

be available. The first batch of project funding will be for 3 years of funding recommendations for funding beginning July 1, 2022.

Mark continued by saying that the anticipated federal funding for CDBG is approximately \$2 million per year however the actual amount is unknown. HUD generally provides the allocation amount for the County in March or April of each year. , HOME and ESG in the coming year is still unknown. The Community Development Program allocate approximately \$1 million per year for administration and a housing rehabilitation program. The project may also be funded with prior year grant funds that have not been expended.

Also if anyone has any questions after this meeting they can email Mark anytime. Mark explained that this application process is for 3 years (2022, 2023 and 2024) of project proposals. The CDBG Program sometimes projects get cancelled so having numerous project proposals recommended for funding allows for projects to be moved from one year to the next so that the County can meet the HUD CDBG Timeliness requirement. HUD requires that these grant funds be spent in a timely manner. Applications will be reviewed in January and February. Several factors are considered when reviewing applications including; the number of persons served, the low-income area, the geographic location of each project and the readiness of the sponsors to proceed with the project. Some sponsors may be asked if they can scale back a project budget depending on the project and the anticipated available funding.

Once staff have reviewed each application proposal, the staff will make a recommendation to the Policy Advisory Board for discussion and consideration. Policy Board members are representatives of each city in the County. After the Policy Advisory Board approves of the Funding Recommendations list, the 3-year list of Funding Recommendations will be part of the Action Plan that is published for a 30-day comment period. The Funding Recommendations will be presented to the Board of County Commissioners in April for review. In May of 2022, the final approval of the Action Plan which is an annual funding application to HUD and project funding recommendations will be provided by the Board of County Commissioners then submitted to HUD.

Public Comments:

Attendees asked about the types of projects funded and the range of grant amounts. Mark responded that the funding range is generally from \$50,000 to \$300,000 but some projects have been funded at as low as \$15,000 and as high as \$450,000.

Types of projects funded have included: Senior centers renovations and additions, Child care center renovations and additions, Child services, Homeless shelter renovations and additions, ADA sidewalks, street improvements, waterlines and sewer lines.

Appendix A: Public Comments

Examining proposals to see how many people are assisted, low income neighborhoods and geographic distribution of funds.

One attendee asked if a Locker facility where people could get books and food would be considered a facility. Mark responded that it could be considered but how would that facility be secured to ensure that the facility was functional for 10-20 years? With land and buildings, it's easy to put a lien on the property to secure the grant funds are used as intended for a long period of time.

One attendee asked why the timeline, why are applications now for funding that the County does not have yet? Mark responded that staff need time to review each application carefully, negotiate with sponsors and meet with the Policy Advisory Board before presenting these recommendation to the Board of County Commissioners in April. The HUD application is due in May. The applications must be reviewed while other work on project is also occurring.

Mark explained that the County has agreements with the Cities to use demographic and census data to get CDBG allocations. Cities have seats on the Policy Advisory Board to help review funding recommendations for these projects.

Mark asked if there were any other questions or comments. Mark thanked everyone for attending and reminded them all to contact him with any questions and that the April date with the Board of County Commissioners is a great opportunity to talk to the board about their projects and funding.

Mark also said that CDD staff are available anytime by phone and email to discuss potential project ideas and to help answer any questions about the CDBG application process.

The public meeting concluded at 6:50 p.m.

Clackamas County Community Development Public Meeting Summary

6:00p.m. Tuesday, November 16, 2021
Online via Zoom meeting
Oregon City, Oregon

Appendix A: Public Comments

In Attendance:

Peter Tompkins-Rosenblatt, Northwest Housing Alternatives
Sarah, Hoodland/Sandy Library District
Leota Childress, Molalla Hope
Mac Corthell, Planning Director, City of Molalla
Rebekah Albert, Northwest Family Services
Corrie Etheridge, Northwest Family Services
Amy Council, Project Coordinator, Community Development Program
Mark Sirois, Manager, Community Development Program

Mark Sirois, Community Development Division, opened the meeting at 6:00p.m. by thanking everyone for attending. Mark explained that the public meeting was a chance for community members to learn about the Community Development Program and the funding that HUD provides to Clackamas County. The meeting also provides an opportunity to get information from citizens on the specific community needs and discuss potential future housing and community development projects in the County. Mark invited everyone to attend the additional meetings on April 8, 2022 and May 6th 2022 with the Board of County Commissioners to get approval to submit to HUD.

Mark encouraged attendees to sign in with name and agency using the chat function of the online meeting platform.

Mark gave a slide show presentation about the CDBG Application and Consolidated Planning process to develop a 5 year plan. The 2022 plan is the first year of the new 5 year plan. This new funding cycle is starting now since the applications for CDBG funding are available and must be submitted by December 22, 2021. The first batch of project funding will be for 3 years of funding recommendations for funding beginning July 1, 2022.

Mark continued by saying that the anticipated federal funding for CDBG is approximately \$2 million per year however the actual amount is unknown. HUD generally provides the allocation amount for the County in March or April of each year. The Community Development Program allocate approximately \$1 million per year for administration and a housing rehabilitation program. The project may also be funded with prior year grant funds that have not been expended.

Also if anyone has any questions after this meeting they can email Mark anytime. Mark explained that this application process is for 3 years (2022, 2023 and 2024) of project proposals. Applications will be reviewed in January and February. Each application project proposal will be thoroughly examined and in some cases sites will be visited. Several factors are considered when reviewing applications including; the number of persons served, the low-income area, the geographic location of each project and the readiness of the sponsors to proceed with the project.

Appendix A: Public Comments

Some sponsors may be asked if they can scale back a project budget depending on the project and the anticipated available funding.

Once staff have reviewed each application proposal, the staff will make funding recommendations to the Policy Advisory Board for discussion and consideration in March. Policy Board members are representatives of each city in the County. After the Policy Advisory Board approves of the Funding Recommendations list, the 3-year list of Funding Recommendations will be part of the Action Plan that is published for a 30-day comment period. The Funding Recommendations will be presented to the Board of County Commissioners in April for review. In May of 2022, the final approval of the Action Plan which is an annual funding application to HUD and project funding recommendations will be provided by the Board of County Commissioners then submitted to HUD.

Public Comments:

Attendees asked if CDBG could fund children and youth services. Mark answered that services for low-income and at risk youth was eligible however only 15% of CDBG funds could be used for services which is about \$350,000 per year.

Mark also said that he would work with other divisions to distribute homeless services funding from other grant sources. The County is trying to align more homeless services, requests for proposals and fund sources to reduce duplication of efforts by County staff and community-based providers.

Someone asked about a question in the application on income eligibility records for homeless persons. Mark explained that HUD requires us to make sure that persons served are low income such as persons going to a foodbank. Is there a way to determine household income even if it's a self-certify? In the case of homeless services, the people served are considered low-income since they are determined to be homeless during the intake process. Client records and demographic information such as race and ethnicity is required for HUD reporting.

Homeless shelter improvement projects, warming center improvement projects are eligible for CDBG funding. See the Priority Listing that has numerous activities listed as high priority for Clackamas County. Any building ADA accessibility projects such as bathrooms and building entry improvement projects are also eligible.

Someone asked if it's OK to submit an application for 3 years of funding. Mark responded that it is acceptable to submit an application for 3 years of funding. With CDBG services the intention is to fund expanded services or new services as "startups" until the agency or service can get additional funding to continue operations.

Appendix A: Public Comments

Budget submittal process: Additional budget documents are not required to be uploaded if the narrative and submitted budget is clear about the length of the budget, sources and uses of funds and whether or not the funds are committed or uncommitted.

Types of projects funded have included: Senior centers renovations and additions, Child care center renovations and additions, Child services, Homeless shelter renovations and additions, ADA sidewalks, street improvements, waterlines and sewer lines.

Mark explained that the County has agreements with the Cities to use demographic and census data to get CDBG allocations. Cities have seats on the Policy Advisory Board to help review funding recommendations for these projects.

Mark asked if there were any other questions or comments. Mark thanked everyone for attending and reminded them all to contact him with any questions and that the April date with the Board of County Commissioners is a great opportunity to talk to the board about their projects and funding.

Mark reminded attendees that CDD staff are available anytime by phone and email to discuss potential project ideas and to help answer any questions about the CDBG application process.

The public meeting concluded at 6:45 p.m.

Community Participation Plan

Part of the 2022 – 2026 Consolidated Plan



Healthy Families. Strong Communities.

Clackamas County
Community Development Division



Draft - January 2022

Community Participation Plan

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A. General Policies

The purpose of this Community Participation Plan is to provide a framework to guide Clackamas County's efforts to encourage Community participation in the process governing the County's community planning and development programs. Community Development (CD) programs include: the Community Development Block Grant (CDBG), the Emergency Solutions Grant (HESG), the HOME Investment Partnership (HOME), and Housing Opportunities for Persons with AIDS (HOPWA). The CD programs are all funded by the U.S. Department of Housing and Urban Development and governed by federal regulations. Clackamas County is categorized by HUD as an “urban county” and is required to adhere to the regulations for an “urban county”. The Community Participation Plan is part of the Consolidated Plan adopted by Clackamas County and is subject to the same public review and comment process for adoption and amendment. *Federal Regulation Reference: 24 CFR 91.105*

Clackamas County and the Housing Authority of Clackamas County (HACC) have entered into a Collaboration Agreement to align their consolidated planning cycle(s) and PHA planning cycle(s) in accordance with the regulations at 24 CFR part 91, for consolidated plan program participants, and 24 CFR part 903, for Public Housing Authorities. HACC agrees to work with Community Development to prepare the Assessment of Fair Housing (AFH) and has amended its Administrative Plan and Admission and Continued Occupancy Policy to reflect the timelines and amendment definitions included in this Community Participation Plan.

The primary goal of the Community Participation Plan is to provide for and encourage participation in all phases of the CD program by low and moderate-income persons, especially those residing in neighborhoods which are considered slum and blighted areas, are predominately low and moderate-income, or are areas where program funds are proposed to be used. Staff will provide technical assistance in developing proposals for CD program funding to any individuals or groups requesting such assistance.

Access to Information: Members of the general public, public agencies, and other interested parties will be provided with access to program records and information related to the Consolidated Plan, amendments to the Consolidated Plan, performance reports, and the use of CD program funds during the preceding proposal funding period at the CD program office during normal working hours. Copies of program documents and reports will be available, and will be available in a form accessible to persons with disabilities upon request. Availability of key documents will be included in the legal notices published to solicit comments on the program documents.

Community Participation List: A Community participation electronic distribution mailing list shall be the primary method of notifying interested persons of CD program activities. Interested persons who do not have access to electronic notifications will be mailed paper notices via the postal system. The Community Participation list (CP List) is made up of members of the Policy Advisory Board, representatives of government agencies, community planning organizations, public housing developments, neighborhood associations, all persons who have submitted project proposals in the last project proposal cycle, and any persons requesting to be placed on the mailing list and email distribution list.

Annual Action Plan: The annual Action Plan is a listing of the CDBG and HOME projects that will be completed during the program year. The Annual Action Plan also serves as the County’s application for funding that is submitted to HUD every year for approval or “release” of funds to the County.

Consolidated Plan: The Consolidated Plan is a five (5) year plan of projects and serves as a strategic plan for how funds will be used to meet the Community Development goals of HUD and the County Community Development Division (CD).

Assessment of Fair Housing Plan: Clackamas County is Affirmatively Furthering Fair Housing by establishing Fair Housing Plan goals for the 2012 – 2026 program years.

Newspaper of Record: Notification of public hearings and advisory committee meetings will be given electronically and by public notices which will be placed in the two County newspapers of record. Notifications in the form of legal advertisements will be placed in newspapers so as to appear a minimum of ten (10) days prior to the meetings.

Community Development uses two papers of record that have the most circulation in Clackamas County. The two papers of record are:

Clackamas Review

503-786-1996

www.clackamasreview.com

Lake Oswego Review

503 - 546-0752

www.lakeoswegoreview.com

Both newspapers have the same business address:

4728 SE International Way, Suite F

Milwaukie, Oregon 97222-8825

Non-English Speakers

Clackamas County adopted a Civil Rights Title VI Plan in 2016 which includes a section on Limited English Proficiency (LEP) which provides the following guidance:

“When looking at the County as a whole, the following languages have an LEP score not strong enough to meet the 5 percent threshold, but are above the 1,000 person threshold and should be considered during outreach planning:

Language	Percent of Total County Population	Total persons
Spanish	2.33%	8,365
Chinese	0.39%	1,417
Russian	0.31%	1,122
Korean	0.28%	1,022
Vietnamese	0.28%	1,015

Source: U.S. Census Bureau, 2010-2012 American Community Survey
Language spoken at home by ability to speak English for the population 5 years and over; persons who speak English *less than "very well"*.

The Regional Equity Atlas provides an overlay for percent of households with Low English Proficiency. Looking at Clackamas County, the highest concentrations of LEP households are:

1. East of the Willamette River (6.1%) in cities: Milwaukie, Gladstone, Happy Valley, Johnson City, and the northeastern portion of Oregon City (Park Place neighborhood and west to the river);

2. East of the Willamette River (6.1%) in unincorporated areas: (Ardenwald-Johnson Creek and Lewelling neighborhoods in Portland); the Oak Grove area; the Jennings Lodge, Southgate, North Clackamas and Clackamas CPOs; the Beaver Creek Hamlet area; and the Aurora-Butteville-Barlow CPO as well as the northern portion of the North Canby CPO; and
3. West of the Willamette River (7.3%): in the City of Wilsonville; and western portions of the Far West CPO and the entire Ladd Hill CPO.

The remaining area of Clackamas County is in the 3% - 5% LEP overlay. Given that the Regional Equity Atlas also allows one to drill down to the census tract level, consulting this resource for determining actual LEP percentages in those tracts for a program or project is advised.”

Due to the small size of the LEP population in Clackamas County, CD has elected to address the LEP need as a reasonable accommodation.

POLICY:

1. Language interpreters will be provided for all CD clients at no cost to the client.
2. Documents may be translated for CD clients who do not communicate in English.
3. A TTY telephone shall be provided for CD clients.
4. CD shall provide printed materials in alternate formats for CD clients.
5. CD and its staff shall make whatever reasonable accommodations are needed to improve accessibility to programs, activities and services.

B. Policy Advisory Board

A primary forum for making recommendations to the Board of County Commissioners on proposed projects or programs to be funded by the CD program shall be the Policy Advisory Board (PAB). The PAB is comprised of 15 members, each representing one of the cities which are partners with the County in the CD program. PAB members are selected by their respective cities usually from city representatives such as the city manager, community development director, public works director or the planning director. The PAB committee meets at least once per year or more on an "as needed" basis to review the list of proposed projects and discuss program policies. The meetings are open to all interested persons. Notification of the meetings and periodic packets of information are sent electronically via email to PAB members as well as the Community Participation List (CP List).

C. Public Meetings

In the Fall of each program year a planning schedule is prepared and distributed to the Community Participation List. The planning and meeting schedule informs persons of the date and purpose of any public hearings, advisory committee meetings and key events in the consolidated or annual planning process.

Public meetings are held in the evening at a centrally located public building convenient for potential beneficiaries of the CD program to attend. Public meetings provide opportunities for community members to dialogue with CD program staff and ask about the amount of CD program funds available, the application process and the range of eligible activities. The public meeting is publicized in the two County newspapers of record as well as by a notice sent to the CP List via the email list.

Public hearings and advisory committee meetings dates and locations are included in the agency schedule which is emailed to persons and groups on the CP List. All meetings and public hearings held for the purpose of discussing the CD program are held in locations accessible to people with physical disabilities. Beginning in 2020 meetings have moved to online meeting platforms.

Meetings are often held at the following location:

Clackamas County Public Services Building
2051 Kaen Road
Oregon City, Oregon 97045

Local project specific meetings may be held in other locations throughout the County with neighborhood groups and affected neighborhoods on an as needed basis. These meetings will be publicized through direct contact with representatives of the affected community, advocacy groups, email lists, flyers, or newspaper ads where appropriate.

Reasonable accommodation will be provided for any individual with a disability pursuant to the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990. Any individual with a disability who requires reasonable accommodation to attend or participate in this meeting may request assistance by contacting the Section 504 Coordinator. Determinations on requests for reasonable accommodation will be made on a case-by-case basis. All requests must be made at least 5 days before the meeting date.

Section 504 Coordinator Contact: Mark Sirois, Clackamas County Community Development, 2051 Kaen Road – Suite 245, Oregon City, Oregon 97045.
Telephone: (503) 655-8591. E-Mail: marksir@clackamas.us.

D. Notice of Funding Available

Solicitation of proposals for grant funds for the CDBG program will be done on a three-year cycle and a two - year cycle to complete the 5-year, 2022 – 2026 Consolidated Plan funding period. Legal notices announcing the availability and amount of the funds and the program's intent will be published in the two newspapers of record and all other newspapers printed within the County in the Fall prior to the beginning of the new CDBG funding cycle. The CDBG program's national objective of benefit to lower income persons and neighborhoods will be emphasized. Cities, organizations and individuals will be encouraged to submit project proposals for consideration by the Community Development Division and the Policy Advisory Board.

Proposals for Emergency Solutions Grant (HESG) and HOME programs will be solicited annually according to the HESG and HOME program policies and regulations. Any other new funding that becomes available will be advertised in accordance with the particular federal funding rules and regulations.

E. Public Comments

The Policy Advisory Board (PAB) will hold one or more meetings as needed to discuss and recommend a list of CDBG, HOME and HESG projects to be funded during the next 3 or 2 year period and/or the annual Action Plan list of projects. The PAB recommendations will be presented to the Board of County Commissioners (BCC) at an

annual public hearing held in the Spring during daytime or evening hours at the BCC hearing room in Oregon City or an online internet meeting platform. The hearing will be publicized in the two County newspapers of record as well as by a notice sent to the Community Participation List.

This public hearing will provide an opportunity for community members to review and comment on the proposed projects and the entire Consolidated Plan as well as comment on the past use of program funds and CD program performance in general.

Comments from the public will be considered by staff and a final Consolidated Plan will be prepared and submitted to the BCC for their approval. In the years of the CDBG program cycle that no solicitation for new projects has occurred, the project selection process will be minimized however annual Action Plans that include the list of project selected in prior year Consolidated Planning will be available for viewing and comment.

Activity	Comment Period
Draft 5- year AFH Plan	45-Day Comment Period
Draft 5-year Consolidated Plan	30-Day Comment Period
Draft Action Plans -Annually	30-Day Comment Period
Amendments to Consolidated Plan	30-Day Comment Period

While the 5-year AFH Plan and the Consolidated Plan are being developed, community members, public agencies, and interested parties will be kept informed of the amount of funds available, the range of eligible activities, goals and the estimated amount of program funds which will benefit low and moderate-income persons. Public communications will be accomplished through a combination of public notices, posting to websites and mailings to the CP List. Once a proposed Consolidated Plan is prepared, a public notice containing a summary of the plan will be published in the two County newspapers of record.

A draft copy of annual Action Plans and the Consolidated Plan with a summary that contains contents and purpose of the plan will be posted on the Clackamas County Community Development Division website. The summary will also be sent to the CP List by email. Complete copies of the proposed plan will be available at the Community Development Division website. The publication date of the summary of the proposed plan will begin a thirty day period during which community member comments on the plan will be accepted.

CD program staff will consider all comments received during the thirty day period, and a summary of all comments received, and the reason for not accepting any particular comments will be attached to the final Consolidated Plan or Action Plan. After the close of the 30-day comment period the plans will be submitted to the BCC for final approval of the plan, a request for authorization to sign funding applications and a request for authority to approve all amendments to the plan.

F. Assessment of Fair Housing Plan

Clackamas County is Affirmatively Furthering Fair Housing by establishing fair housing goals for the 2022 – 2026 program years. The 2022-2026 Assessment of Fair Housing was conducted jointly by the Community Development Division and the Housing Authority of Clackamas County. CD program staff report progress on those goals to HUD in consolidated annual performance reports that are posted on the HCD Website and in a HUD data base.

HUD sets out four clear fair housing goals for all communities to ensure greater opportunities to for all Americans:

- 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 people of different races, colors, and national origins with more severe housing problems, aka., disproportionate housing needs.*

The public, residents, public agencies and other interested parties will have access to any HUD-provided data and other supplemental information the county plans to incorporate into its Assessment of Fair Housing (AFH) at the start of the public participation process, or as soon as feasible after. The county may make HUD-provided data available to the public by cross-referencing to the data on the HUD website.

Clackamas County CD staff meets with community groups, reviews HUD data tables and HUD maps to develop the Assessment of Fair Housing (AFH) Plan goals. Through consultation with the Housing Authority of Clackamas County (HACC), CD staff will consult with HACC Resident Advisory Boards in accordance with policies and procedures described in 24 C.F.R. §§ 903.13, 903.15, 903.17, and 903.19 in the process of conducting the Assessment of Fair Housing (AFH), obtaining Resident Advisory Board and community feedback, and addressing complaints.

The draft of the AFH Plan will be posted for 45 days to allow for interested persons and organizations to comment. Public comments will be considered and included in the final Assessment of Fair Housing (AFH) Plan.

Activity	Comment Period
Assessment of Fair Housing (AFH) Plan	45-Day Comment Period
Substantial Amendments to the AFH Plan	45-Day Comment Period

Clackamas County’s CD program will amend its AFH Plan when any of the following events occur:

Minor Amendment

A Minor Amendment shall occur when personnel changes or partner agencies increase or decrease active participation in achieving AFH goals. In this case, the amendment to the AFH Plan will occur through an administrative process. Approval of the change is at the discretion of the CD Director and involves a determination that all of the following criteria have been met:

- Key personnel have changed responsibilities or agencies, or
- Partner agencies have changed their active participation in achieving AFH goals.

Substantial Amendment

A change to the AFH Plan shall be considered Substantial and shall follow the formal Substantial Amendment Process due to a material change in circumstances in Clackamas County that affects the information on which the AFH is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. A Substantial Amendment to the AFH plan will occur when any the following criteria are met:

- A goal must be added due to new information
- A goal must be removed due to new information
- A natural or man-made disaster has re-directed County resources for an extended period of time of 2 years or more.

Notice of proposed AFH Plan Substantial Amendment will be published in the two County newspapers of record and posted on the Clackamas County CD website. Community members will be given a 45-day period in which to comment on the proposed AFH Plan amendment, and CD program staff will consider all comments received. The substantially amended AFH Plan will be submitted to HUD for review and approval. A summary of all comments received, and the reason for not accepting any particular comments will be attached to the amendment.

G. Public and Community Outreach

For the Assessment of Fair Housing Plan, Action Plans and Consolidated Plans, CD program staff will maintain contacts with other public and private agencies that provide assisted housing, health services, and social services (including those focusing on services for children, elderly persons, persons with disabilities, LEP persons, minority group representatives, persons with HIV/AIDS and their families, or homeless persons),

community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws.

Clackamas County provides opportunities for community participation throughout the development of the Assessment of Fair Housing Plan, Action Plans and Consolidated Plans.

For Action Plans and Consolidated Plans, CD program staff will attempt to involve effected communitites in project development and management where feasible. Depending on the type of project the involvement effort will vary. Some projects such as a senior center construction or park improvements will be designed and constructed in cooperation with local advisory groups or neighborhood associations. Mailings to residents will be used to encourage participation in neighborhood improvement type programs as applicable.

The primary focus of the CD program's outreach effort to residents of publicly assisted housing will be through consultation with the Housing Authority of Clackamas County (HACC). The appropriate staff persons will be kept informed of CD program activities during all phases of the program year. Residents will be kept informed of CD program activities through contact with the staff liaison to the HACC Comprehensive Grant Committee and through mailings to the committee members that are included on the CP List. CD program staff will provide HACC staff with information about Consolidated Plan activities which are related to its housing developments and the surrounding communities through direct contact, mailings, or project specific meetings where appropriate. Prior to the annual public hearing held by HACC to satisfy Comprehensive Grant requirements, CD staff will make relevant Consolidated Plan information available to HACC staff and/or the Comprehensive Grant Committee.

H. Amendments to the Consolidated Plan

Clackamas County's CD program will amend its Consolidated Plan when any of the following events occur:

Minor Amendment

A Minor Amendment shall occur when the budget, scope or capacity of a funded activity is adjusted by less than 25%. In this case the amendment to the Consolidated will occur through an administrative process. Approval of the change is at the discretion of the CD Director/manager and involves a determination that all of the following criteria have been met:

1. The proposed change is not Substantial,
2. The proposed change is consistent with the intent of the original scope of work.
3. The proposed budget change is reasonable and,
4. Adequate funds are available to finance the proposed change, without causing a substantial change to other activities, projects or programs.

Substantial Amendment

A change shall be considered Substantial and shall follow the formal Substantial Amendment Process when the budget, scope or capacity for a funded activity is adjusted by more than 25% and/or involve actions described below:

1. An activity described in the annual Action Plan is cancelled;
2. A new activity not described in the annual Action Plan is planned;
3. The location of an activity described in the annual Action Plan is changed so that it is located in a different service area than originally described;
4. The beneficiaries of an activity described in the annual Action Plan are changed so that the predominant group of beneficiaries is different from those which were described;
5. The purpose or scope of work of an activity described in the annual Action Plan are changed in essential, important, or significant ways from those described, as determined by the Community Development Director; or
6. The purpose or scope of the activity described in the annual Action Plan is changed such that the budget of the project is increased by at least \$25,000 and more than 25% of the original activity budget.

Activity	Comment Period
Substantial Amendments to Consolidated Plan	30-Day Comment Period

Substantial Amendment Process:

Notice of proposed Substantial Amendment to the Consolidated Plan will be published in the two County newspapers of record. Amendments may also be posted on the Clackamas County Community Development Division website. Community members will be given a 30-day period in which to comment on the proposed amendment, and CD program staff will consider all comments received. A summary of all comments received, and the reason for not accepting any particular comments will be attached to the amendment.

At the end of the program year, Substantial Amendments are communicated to the public and to HUD through the Consolidated Annual Performance Report (CAPER) public notification process and detailed in the Program Narratives section of the CAPER annual report.

I. Consolidated Annual Performance and Evaluation Report CAPER

Notice that annual performance reports have been prepared will be published in the two County newspapers of record. Community members will be given a 15-day period in which to comment on the performance reports and CD program staff will consider all comments received. A summary of all comments received, and the reason for not accepting any particular comments will be attached to the performance reports.

Activity	Comment Period
CAPER	15-Day Comment Period

J. Anti-Displacement Policy and Relocation Assistance

The CD program shall avoid, whenever possible, and in all cases minimize, the permanent involuntary displacement of persons as a direct result of activities assisted under the CD program. The CD program's Funding Policies discourage proposals for grant funds that cause individuals or businesses to be displaced. Projects with potential for displacement, will, whenever feasible, be structured to reduce the occurrence of displacement by phasing the work, or providing temporary housing.

Clackamas County's CD program will provide assistance to persons displaced in compliance with the Community Development Act of 1974, as amended, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended, and HUD regulations pursuant to the Acts. Generally, this assistance consists of reasonable moving and related expenses, assistance in relocating, and financial assistance to secure replacement housing.

Information regarding assistance to displaced persons will be provided by contacting the affected persons as soon as the possibility of displacement is determined. The appropriate HUD booklets explaining relocation assistance will be provided, and technical assistance will be offered.

Federal Regulations Reference: 24 CFR Section 570.606

K. Civil Rights, Complaints and Grievance Process

Title VIII of the Civil Rights Act of 1968 is known as the Fair Housing Act. The Act, as amended in 1974 and 1988, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status, and disability. These seven classifications are collectively termed federally protected classes. The federal familial status provision protects children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

CD program staff will provide a substantive written response to all written Community complaints received related to the Consolidated Plan, AFH, plan amendments, and performance reports, within 15 working days from receipt of the complaint. Community members not satisfied with the staff response may request a review of the complaint by the CD Manager. Reviews may be requested by telephone, email or letter to the CD Manager and should include a summary of the complaint as well as the summary of the response from the CD program staff.

Activity	Response Period
Complaint received	15 days

Clackamas County now has an Office of Equity and Inclusion.

Website: <https://www.clackamas.us/diversity>

If any Community members feel that they have been discriminated against, they may file a complaint with Clackamas County as detailed in the 2017 Clackamas County county-wide Civil Rights Title VI Plan:

Clackamas County Civil Rights Title VI Plan updated in 2017

“It is the policy of Clackamas County that no person shall be denied the benefits of, or be subjected to discrimination in, any sponsored program, service, or activity provided by County staff, contractors, or consultants on the grounds of race, color, national origin, limited English proficiency, age, disability, religion, marital status, familial status, sex, gender, gender identity, sexual orientation, or source of income”.

Filing a Title VI Complaint:

Complaints should be filed with Title VI Officer in the County Administrator’s Office. Complaints must be in writing and signed by the complainant. If the complainant needs assistance in reducing the complaint to writing or signing it, he or she may request assistance from the Title VI Officer or may have another person write and acknowledge the complaint on his or her behalf.

Any person who believes that she or he has been the object of unequal treatment or discrimination related to the receipt of benefits and/or services based on his or her race, color, national origin or limited English proficiency has the right to file a written discrimination complaint against Clackamas County via the Civil Rights Coordinator. In addition, written complaints alleging disability discrimination may be filed with the Civil Rights Coordinator as well. Written complaints based on protections afforded under other

civil rights statutes, such as religion, sex, sexual orientation, gender identity, age or source of income will be reviewed by the Clackamas County Legal Counsel's Office. This is an administrative process that does not provide for compensatory or punitive damages. The county's process is not exclusive. That is, a person who files a complaint with the county may also file a complaint with other state or federal agencies or the courts. There are time limits that apply to the filing of complaints. Generally, federal agencies require that Title VI complaints be filed within 180 days of the date of the discrimination.

- 中文
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- tiếng Việt

Full Title VI Compliance Plan

The complaint should include names and contact information of any witnesses, including County employees or contractors. Allegations may be faxed or e-mailed and will be acknowledged. Allegations sent by fax or e-mail will not be processed until the identity of the complainant and the intent to proceed with the complaint have been established. The complaint form must be signed or acknowledged, and returned to the Title VI Officer for processing.

The original copy may be sent, faxed, or emailed to:
Title VI Officer
2051 Kaen Road, Room 450
Oregon City, Oregon 97045
Fax 503-742-5919
civilrights@clackamas.us

L. CONTACTS AND RESOURCES:

Community Development Division

Public Services Building
2051 Kaen Road – Suite 245
Oregon City, Oregon
Phone number: 503-655-8591

Mark Sirois, CD Manager
marksir@co.clackamas.or.us

Pamela Anderson, CD Manager
panderson@clackamas.us

Steve Kelly, Project Coordinator
stevekel@clackamas.us

Amy Council, Project Coordinator
acouncil@clackamas.us

Clackamas County Community Development website includes maps of low/mod income areas, funding policies, meeting notices, meeting schedules, Assessment of Fair Housing (AFH) Plans, Consolidated Plans, annual Action Plans, information on HOME repairs grants and loans, and other programs.

Website: <http://www.clackamas.us/communitydevelopment/>

HUD Portland Office
Green-Wyatt Federal Building
1220 SW 3rd Avenue, Suite 400
Portland, OR 97204-2825
Phone number: 971-222-2600

HUD in OREGON Website: <https://www.hud.gov/oregon>

HUD Community Development and Planning website:
https://www.hud.gov/program_offices/comm_planning

The HUD **Office of Fair Housing and Equal Opportunity** (FHEO) administers and enforces [federal laws](#) and establishes policies that make sure all Americans have equal access to the housing of their choice. [Learn more about FHEO](#), or contact the Housing Discrimination Hotline by email at: fheo_webmanager@hud.gov or at **1-800-669-9777 (Voice) | 1-800-927-9275 (TTY)**.

HUD Fair Housing website: <https://www.hud.gov/fairhousing>

Clackamas County Housing Rights and Resources

Housing Rights Hotline: 503-650-5750

Website: <http://www.clackamas.us/socialservices/housingassistance.html>

The Fair Housing Hotline

503/223-8197 (Portland metro area), 800/424-3247, or information@FHCO.org

Fair Housing Council of Oregon (FHCO) is a statewide civil rights organization whose mission is to eliminate housing discrimination through enforcement and education. FHCO is a non-profit corporation.

Website: <http://www.fhco.org/index.html>

Address: 506 SW Sixth Avenue, Suite 1111, Portland OR 97204

Main office: 503/223-8197 Office fax: 503/223-3396

Legal Aid Services of Oregon (LASO) provides legal assistance to low-income individuals and advocacy for individual clients and as a class to assure indirect benefits as mandated by the law with regard to housing discrimination.

Website: <https://lasoregon.org/>

LASO Local Office:

520 SW 6th Ave. #700, Portland, OR 97204

(503) 224-4086 or 1-800-228-6958