

DRAFT Anti-Displacement Strategies Technical Memorandum

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Project: Sunrise Corridor Community Visioning
Attention: Jamie Stasny, Karen Buehrig, Ellen Rogalin
Client: Clackamas County
Prepared by: Jacobs

Jacobs
 2020 SW Fourth Avenue, 3rd Floor
 Portland, OR 97201

Introduction

Housing and business displacement can occur for many reasons. Two of the most common conditions occur due to direct and indirect impacts.

- *Direct displacement impacts* occur when all or a portion of a parcel is removed due to consolidation or condemnation, based on the implementation of infrastructure improvements (similar to the envisioned Sunrise Corridor Gateway Concept).
- *Indirect displacement impacts* can occur due to many factors related to either economic, cultural, climate, erosion, and exclusionary issues.

Within the Sunrise Corridor Community, one of the larger threats to residential and business displacement could come from direct impacts based on construction of the Sunrise Corridor Gateway Concept, and the indirect economic impacts from development pressures due to proximate investments and improvements, as well as indirect impacts caused by erosion. In short, new public infrastructure can catalyze higher land values and stimulate proximate private investment that can lead to displacement.

This memorandum presents anti-displacement strategies that help mitigate the pressures caused by development in the Sunrise Corridor Community, specifically in census tracts with a high percentage of low- and very low-income residents, where public investments in transportation infrastructure may affect property values. The strategies help maximize existing residents’ choices about when, whether, and under what circumstances to move, preserving families’ and business owners’ ability to stay in their homes and neighborhoods. While there is no one way to combat the involuntary displacement that can result from public and private investments in areas of need, there is a wide variety of strategies and tools that can assist residents and businesses staying in place, even when their neighborhoods are undergoing change.

The anti-displacement strategy approach is based on the following principles to ensure the strategies are sensitive to the Sunrise Corridor Community Vision.

Determine the needs of vulnerable housing and businesses

The study area includes a diverse mix of naturally occurring affordable housing and businesses. As employment grows, pressure from new development arises, as well as the associated new public investments needed to support this growth. As a result, many residents and businesses may face the risk of displacement. It is important that the vision, and the strategies mentioned below, take into consideration the people that live, work, and own businesses in the area. Timely policies and strategies to preserve housing and affordability are critical to the success of the project area.

Leverage input received from residents and stakeholders

The people that work, live and own businesses in the Sunrise Corridor know their community best. Through extensive outreach and conversations with residents and stakeholders, it is evident that displacement risk in the project area is significant and an issue of high concern in the community. Many residents worry about possible right-of-way impacts on their properties of the Sunrise Corridor Gateway Concept and Hwy 212/224. Significant development in the Rock Creek employment area also creates risk for gentrification.

Support and enhance vulnerable areas

To strengthen the overall community character, it is important to understand on a block-by-block level which areas are at risk of economic displacement due to development, and thereby, should be protected to reduce displacement pressures. What kinds of actions are required to protect areas from involuntary change? Specific policies and actions can be created and implemented to reduce displacement threats, which could include strategies focused on changes in ownership, philanthropy, tax incentives, subsidies, or development policies, to name a few.

Summary of Anti-Displacement Strategies

Below is a summary of various strategies and tools that can help prevent housing and business displacement. It provides an overview of anti-displacement strategies for renters, homeowners, and small businesses – including how they can be implemented, and the level of financial resources required. The level of financial resources provides a sense of which strategies are the least to most costly. Taken into consideration is the funding needed for initial implementation or investment and the continuing costs beyond start up. The anti-displacement strategies are described in more detail in a subsequent section of this memorandum.

Strategies	Implementation	Financial Resources*: High, Medium, Low
For Renters		
Affordable Housing Fund – Provide flexible, below market financing to preserve existing affordable multifamily housing with a combination of public, private, and philanthropic dollars.	Can take minimum of 2 years to develop. Large start-up costs and complex administration.	Med-High
Tenant Relocation Assistance Ordinance – Support low-income tenants displaced by redevelopment of apartments and mobile home parks by providing advanced notice of the displacement, relocation counseling, and financial assistance.	Requires administration and enforcement by an agency.	Low-Medium (if landlords pay a fee) Medium (if agency covers costs)

Strategies	Implementation	Financial Resources*: High, Medium, Low
Mobile Home Park Zoning – Rezone mobile home parks by applying a special zoning category to the parks, effectively barring redevelopment for other uses.	Utilizes agency’s existing land use/planning staff, zoning, and planning commissions.	Low
Co-operative Ownership Models - Protection of mobile home communities and their affordable housing.	Support and Partnership with Non-profits that help mobile homes switch to resident ownership.	Low-Medium
Affordable Housing Preservation Network and Database – Create and maintain an in-depth database to track affordable rental properties and mobile home parks at risk of redevelopment. Operates a network focusing on the preservation of these properties.	Requires staff to create and monitor database. Led by agency or outsourced to a non-profit.	Low-Medium
For Homeowners		
Mobile Home Park Zoning – Rezone mobile home parks by applying a special zoning category to the parks, effectively barring redevelopment for other uses.	Utilizes agency’s existing land use/planning staff, zoning, and planning commissions.	Low
Community Land Trusts (CLTs) – Provide opportunities for current and future generations of low-income residents to own homes in a gentrifying neighborhood, while giving communities long-term control over the land.	CLTs need resources to acquire land for the CLT homes, such as grant funds, or access to public land or land banking lots. An example of an existing CLT in the region is Proud Ground.	High
Community Preference Policy – Agencies and nonprofit organizations develop and utilize community preference policies for their affordable housing programs to redress prior racial injustices (such as displacement precipitated by urban renewal and freeway construction), further their displacement mitigation goals, and help stabilize communities.	Support from an agency or nonprofit staff is needed to develop, implement and conduct outreach.	Low
Agency and tenant right-to-purchase ordinance – Provide tenants and agencies with the right to purchase government-assisted multifamily rental properties and mobile home parks when the owner decides to sell the property, exit the affordable housing program, or convert rents to market rate.	Purchases are highly complex and require organizations with capacity to assist with acquisition transactions and operation of the acquired properties.	Medium-High
Grants/ Low interest Loans – Another stabilization mechanism for homeowners is to offer grants/ low interest loans for weatherization, repairs, and accessibility renovations. This is particularly helpful for seniors on fixed incomes.	Support is needed from an agency and an organization, or an entity with long-term capacity.	Medium-High
For Small Business Owners		
Commercial Façade Improvement Programs – Assist commercial property owners and tenants to improve their buildings’ exteriors as well as interior spaces with financial incentives, such as matching grants and loans, tax abatements, and design assistance.	Administered and staffed by planning departments, community or economic development agencies, nonprofit organizations, or business improvement districts.	Medium-High
Neighborhood Business Incubators – Help startup businesses grow and succeed by providing free or low-cost workspace, mentorship, and access to investors.	Incubators require an analysis of market conditions and entrepreneur requirements and a plan to identify participating businesses.	Medium-High
Legacy Business Programs – Preserve longtime businesses that contribute to a neighborhood’s history, identity, and character.	Programs are often established by local jurisdictions, business associations, or community-based organizations, and are often spearheaded by neighborhood businesses, business improvement districts, or historic preservation groups.	Medium-High
Technical Assistance and Business Counseling – Provide a fundamental component of equitable economic development that can help BIPOC- and immigrant-owned small businesses overcome historic inequities in accessing resources.	Often administered by business development organizations, community-based organizations, and lenders that receive government funding.	Medium-Low
Streamlined Permitting – Simplify permitting and licensing processes to help small business startups, keep costs down, and facilitate reinvestment for existing businesses.	Local municipalities revise permitting and licensing processes.	Low

Strategies	Implementation	Financial Resources*: <i>High, Medium, Low</i>
Affordable Workspace Policy – Require developers of residential or mixed-use projects on employment land to provide and subsidize affordable workspace for certain types of businesses in new developments at below-market rents, including startups and small- and medium-sized enterprises.	Subsidized through the operations of the residential development.	Medium-High
For All (Renters, Homeowners, Businesses)		
Smoke Free Policies for Public Spaces – A smokefree policy for new and existing public spaces including but not limited to parks, fields, picnic areas, play areas, and walking paths.	Local municipalities adopt and implement policy for new and existing public spaces.	Low-Medium

* Financial Resources – order of magnitude scale to financially support the strategy
 Low – ex.: Small funds needed for policy implementation
 Medium – ex.: Grant funding needed to start the program and staff need to manage the program
 High – ex.: Costs beyond program implementation for individual beneficiaries

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Summary of Existing Conditions, Trends and Risks

The section below summarizes the existing conditions, trends, and risks of the following:

- Population and demographics
- Housing types and cost burden
- Household income and wages
- Employment and industry job concentrations
- Economic assets and constraints
- Public Health metrics existing in the corridor
- Equitable engagement
- Types of displacement risks in the study area

All of these can directly or indirectly influence displacement.

Population and Demographics

The following are some of the population and demographic changes and trends in the study area.

- Between 2011 and 2021 the study area average population increased by 40%, the second highest increase among all geographies next to Happy Valley.
- This growth coincides with increased housing development since the turn of the century, leading to commensurate growth in infrastructure and services.
- Growth has been consistent at the county, region, and state levels, with about 12% growth since 2011.
- People identifying as white make up most of all people across geographies studied, with over 80% in Oregon and Clackamas County, and 81% in the study area.
- According to the 2021 U.S. Census Bureau’s American Community Survey, the number of people by age category is evenly spread.
- People with some college or associate degree account for the highest number for all geographies, between 32% and 34%.

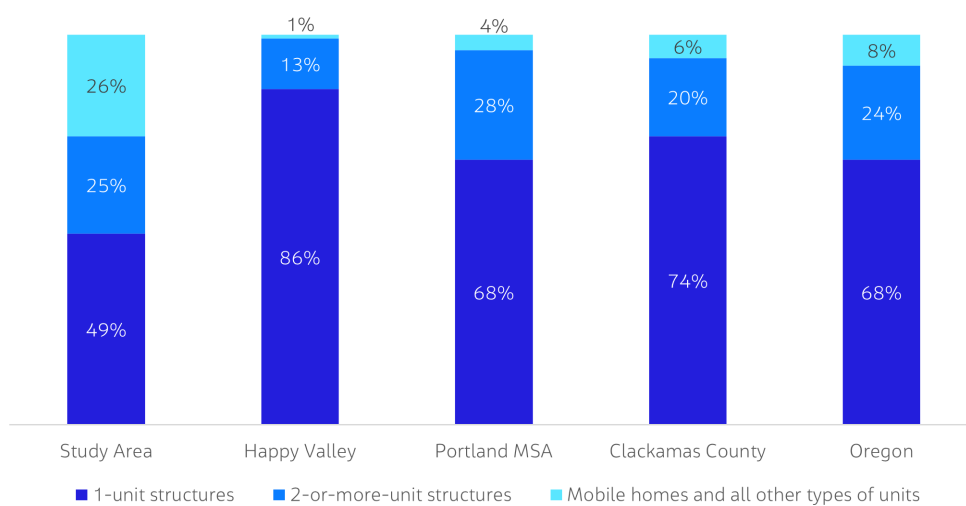
Housing

The following are some of the key points that summarize the housing conditions and trends in the study area.

Study Area Housing Types and Trends

- About 19% of the study area is residential, including single and multi-family homes, many of which are a part of the manufactured housing communities.
- 51% of the housing in the study area is either manufactured housing or 2 or more-unit structures.
- Manufactured housing communities are a major source of unsubsidized housing that are affordable to low- and moderate-income households.
- The study area has apartments and multi-family homes at lower/affordable price points.

Figure 1. Housing Data by Geography, 2021



Source: ACS 5-Year Estimates Table S1101

Housing Cost Burden

- In general, the housing cost burden in the study area is lower than the state overall. A household is cost-burdened when it spends more than 30% of its income on rent and utilities and severely cost-burdened when it spends more than 50% of its income on these expenses.
- In Happy Valley, the proportion of the population experiencing housing cost burdens increases as household income increases from 2.8% of lowest-income households, to 7.8% for the highest earning households.
- This sets Happy Valley apart from the other geographic areas analyzed, where lower income household groups have the highest housing cost burden.

Table 1. Percentage of Total Households e Housing-Cost Burdened by Income Bracket, 2021

HH Income	Happy Valley	Portland MSA	Clackamas County	Oregon
Less than \$20,000	2.8%	7.8%	7.0%	9.5%
\$20,000 to \$34,999	4.0%	7.4%	7.1%	8.2%
\$35,000 to \$49,999	4.4%	6.8%	6.2%	6.3%
\$50,000 to \$74,999	6.2%	7.0%	6.4%	5.8%
\$75,000 or more	7.8%	4.3%	5.6%	3.3%

Source: ACS 5-Year Estimates Table S1101

Median Household Income (MHI)

- The share of people in households earning less than the federal poverty level was 18% in the study area in 2011, decreasing to 14% in 2021.
- This is 6 percentage points higher than the County share, and 10 percentage points higher than Happy Valley’s 4% rate in 2021.
- Although the study area MHI increased 53% or nearly \$21,000, this geography experienced the smallest relative increase in MHI among all other geographies measured.

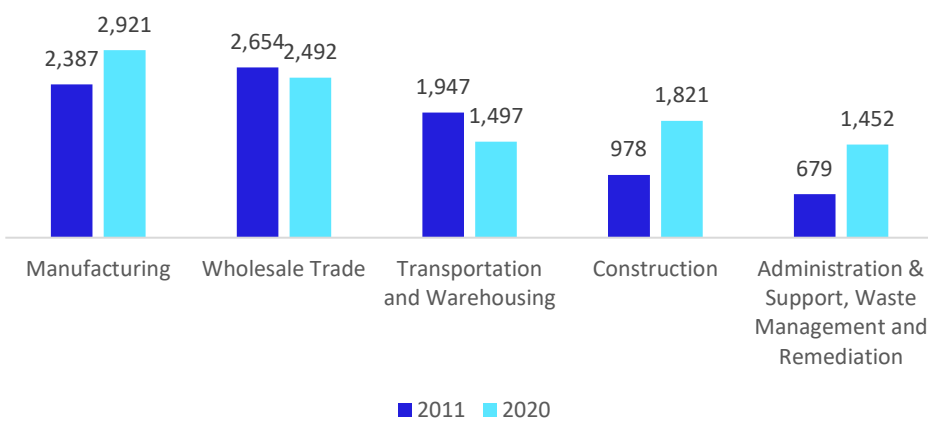
Businesses

The following are some of the key points that summarize the income, employment, and job concentrations in the study area.

Employment and Industry Job Concentrations

- Employment in the study area across all geographies ranges between 59% - 66% and is most dense in the Clackamas Industrial Area, north and south of OR212.
- The top five industries in the study area are manufacturing, wholesale trade, construction, transportation and warehousing, and administration & support.
- Jobs in healthcare, social assistance, education, and professional technical services, while less concentrated in the study area, have seen more robust employment growth in the last four years.
- Primary industry groups are clustered along I-205, OR212 and the railroad terminus at SE Capps Road, highlighting the importance of the Corridor’s transportation network to its industrial cluster.

Figure 2. Number of Jobs by Industry Sector, 2011 and 2021

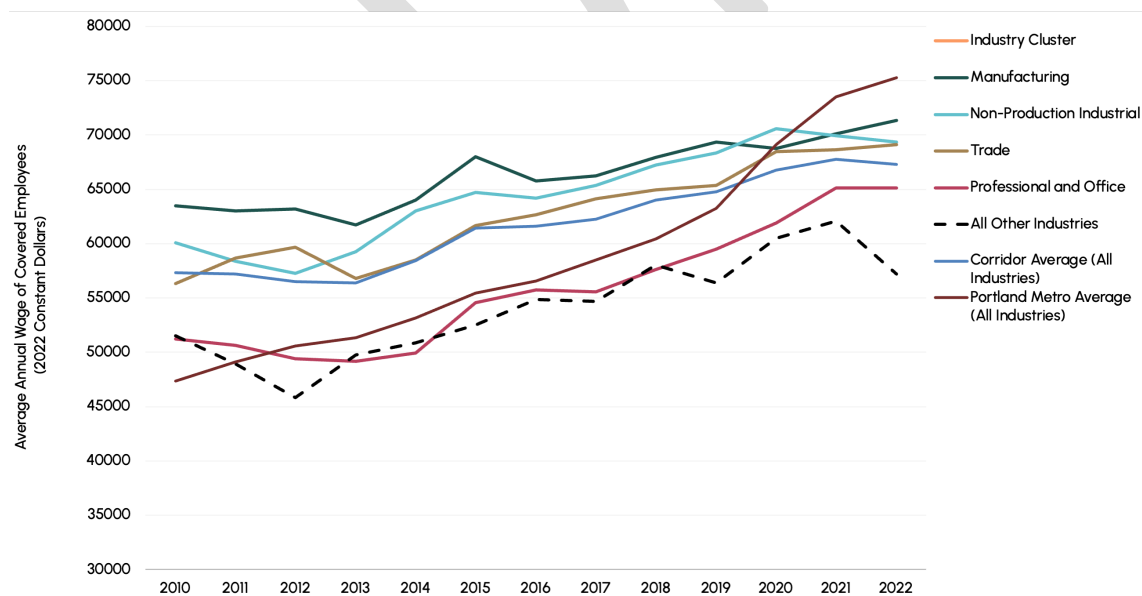


Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics

Wages, Business Trends and Growth

- Wages in the study area have steadily increased since 2010.
- Manufacturing jobs have the highest average annual wages, at \$71,000, and professional and office sector jobs have seen the greatest increase in wages, increasing 27% from 2010 to 2022.
- Generally, wages across Clackamas County lag behind regional averages, which is most likely related to relative industrial distribution.
- The sectors seeing the greatest growth in number of businesses are professional and business services, and education, healthcare, and other services. However, it remains to be seen if these trends were or will be influenced by the pandemic.

Figure 3. Average Annual Wage (Inflation-adjusted) by Industry Cluster, Sunrise Corridor Community, 2010-2022



Economic, Environmental, and Health Conditions and Early Engagement Feedback

Economic Assets and Constraints

- Proximity to I-205 affords strong access to regional transportation networks.
- There is a diverse industrial concentration in the study area of manufacturing, wholesaling, warehousing, and transportation uses.
- In terms of sector growth, the Services sector has seen the fastest growth over the last five years.
- Commercial and industrial real estate markets show low vacancies and increasing rents.
- There is access to a well-trained regional workforce.
- Many sites are encumbered with wetlands. While they could be an asset in terms of open space, they pose several challenges by reducing net developable area, and increasing permitting timelines.

- There are conflicting land uses with an absence of buffers between residential and industrial areas, while retail and commercial services are isolated and not integrated within the community.
- There is an imbalance between jobs and housing, with much of the workforce commuting long distances from outside the study area.
- Additionally, despite strong market conditions, the area has seen limited new commercial or industrial development in recent years.

Economic Competitiveness and Relationship to Displacement

- Although the Sunrise Corridor has more than an acre of vacant or underutilized parcels, many of them face significant development constraints due to environmental limitations, sloped terrain, and ownership complexities.
- The area is projected to add around 1,399 jobs by 2032, with the greatest demand for industrial space (59%) followed by business parks (25%) and office spaces (12%). This translates into over 880k square feet of space.
- These factors put displacement pressures on developed areas for new economic activities, especially on the residential and manufactured home community areas.

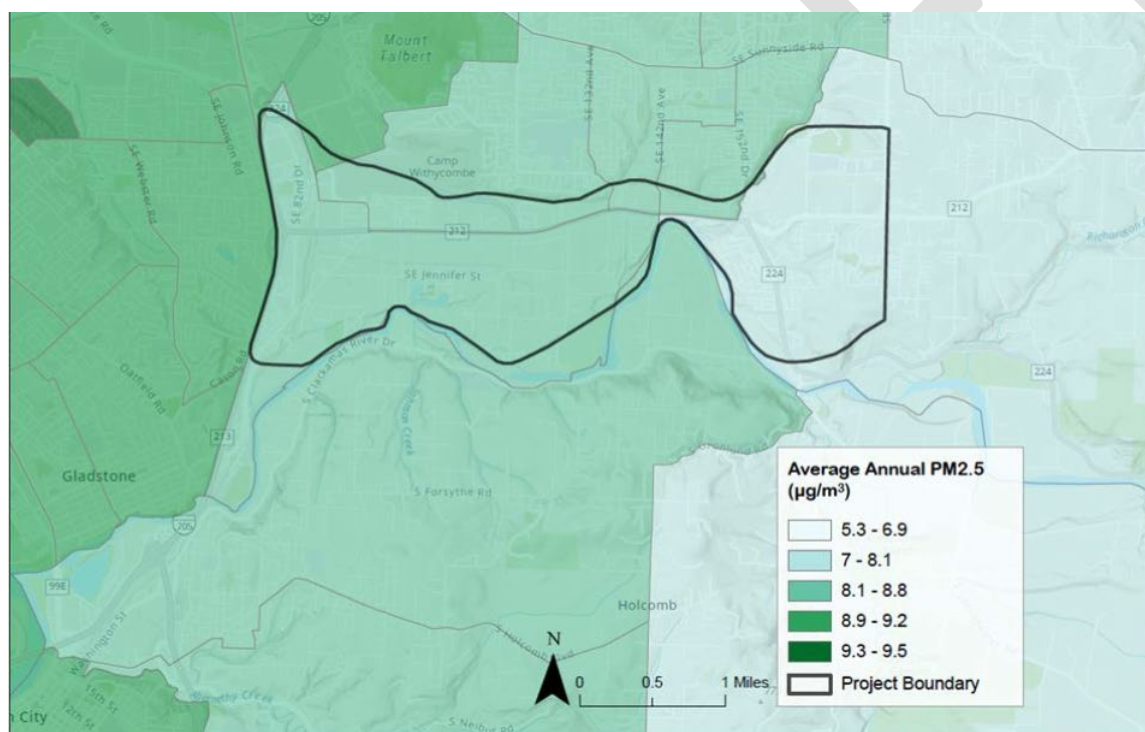
Environmental and Climate Conditions

- Several mobile home communities in this area are experiencing upland stormwater management concerns, and in some cases experiencing some extreme riverbank erosion along Sieben Creek which has resulted in the loss of mobile homes in some areas, including Shadowbrook Mobile homes.

Public Health Existing Conditions

- In terms of vehicle ownership and commute mode, approximately, 9.6% of households within the west side of the study area do not own a vehicle, which is higher than the County average of 5.5%.
- A higher percentage of people living in the west side of the study area have a disability compared to the County average (17.5% vs. 11.8%, respectively).
- According to maps and information available in Clackamas County's Draft Walk Bike Plan, bicycle facilities in the study area exist along OR212 and a small portion of OR224, with a majority of them having unprotected biking lanes next to vehicle lanes.
- In terms of health, the west side of the study area ranks poorly both in mental and physical health, with high percentages of adults with depression and obesity.
- Furthermore, according to available air quality data, the study area is exposed to a relatively average amount of ozone, diesel particulate matter as compared to the rest of the County.

Figure 4. Average annual Particulate Matter 2.5 in air ($\mu\text{g}/\text{m}^3$)



Source: United States Environmental Protection Agency. 2023. EJSCREEN. www.epa.gov/ejscreen. Values derived from the 2019 Office of Air Quality Planning and Standards (OAQPS).

Early Equitable Engagement

- The Clackamas County staff and the Jacobs project team members undertook collaborative efforts to develop an equitable engagement framework with the goals of conducting effective community engagement, mitigating bias, building future partnerships, and having positive public health and safety outcomes.
- Participants mentioned that the project would impact various segments of the community and expressed concern about a lack of communication channels.
- Additionally, suggestions were made for engaging with community groups to disseminate information and involve stakeholders effectively.
- Furthermore, concerns were expressed regarding traffic congestion, infrastructure improvement, environmental sustainability, cultural and recreational spaces, and community engagement in the planning process.

Direct and Indirect Displacement Risk

A community thrives when residents and businesses have access to stable and affordable housing and good jobs. People should be able to stay in the neighborhoods where they choose to raise a family, go to school, build a career, start a business, and grow old. However, direct and indirect displacement impacts, as described in the introduction to this report, can influence residential and business stability. While growth can be positive for a community, it can also bring about a range of displacement risks for some residents and small businesses.

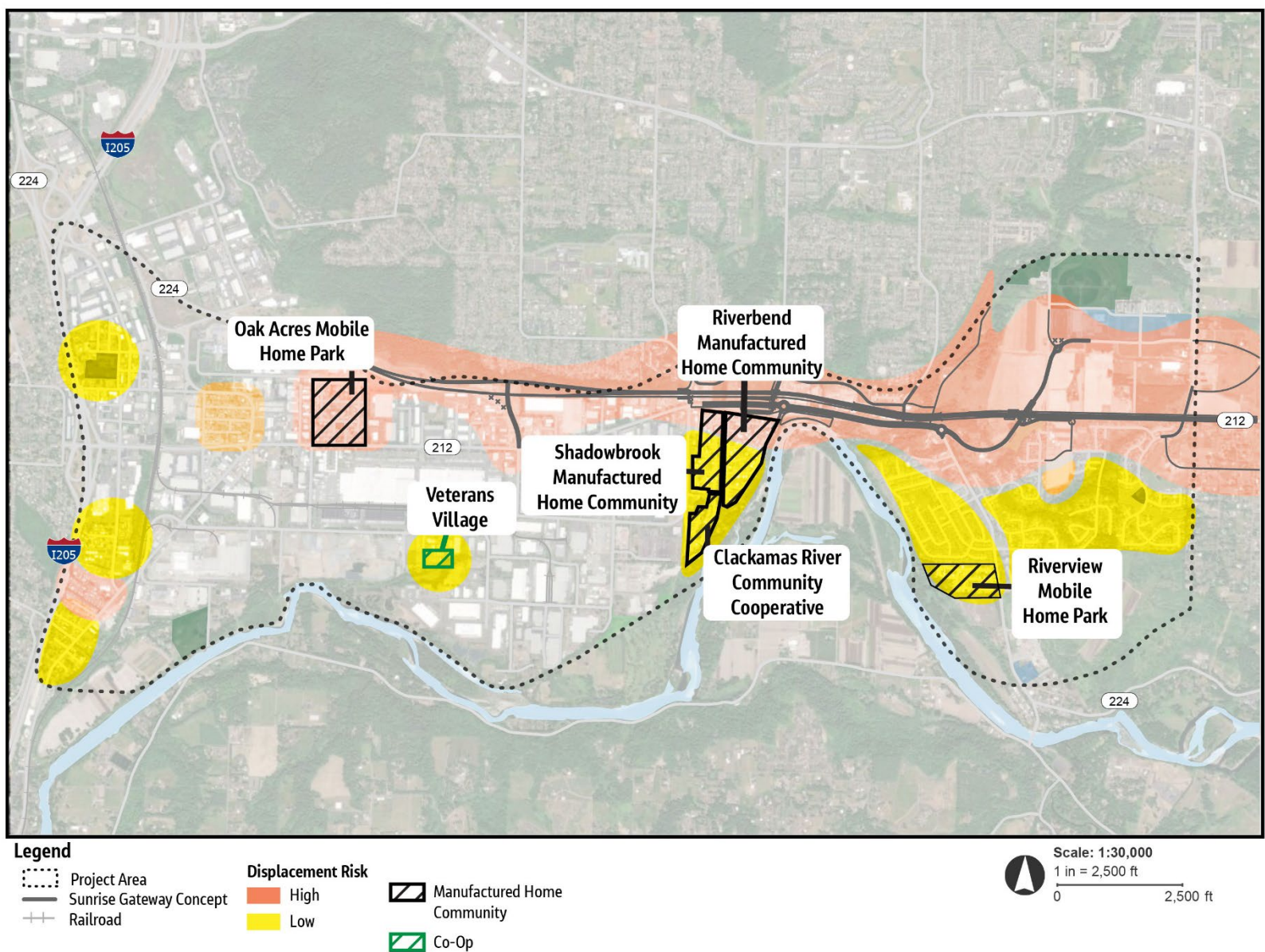
Based on the vision for the Sunrise Corridor Community, several factors could lead to direct and indirect displacement. Direct impacts could occur when the Sunrise Corridor Gateway Concept is constructed. While a range of indirect impacts could also occur, the most significant risks could arise from increases in housing prices and rent costs, including the following:

- New infrastructure investments improve communities and create more desirable places to live, work, and thrive, which in turn can attract more people to the area to compete for limited housing and business resources.
- Development pressures can be catalyzed through infrastructure and other investments that lead to displacement from redevelopment or increased land values.
- Gentrification, which is the process of change in the character of a neighborhood through the influx of wealth and investment, can similarly lead to increased land and rent costs.

The Sunrise Corridor Gateway Concept would create transportation improvements for better and safer mobility, but these improvements may also catalyze potential impacts to surrounding land uses. The heat map below illustrates specific areas that would be at higher levels and lower levels of risk based on proximate planned improvements.

- Higher levels of risk (shown in orange) include direct displacement due to condemnation and indirect economic impacts. These include businesses and at-risk residential communities – Oak Acres Mobile Home Park and Riverbend Manufactured Home Community. Both the small business owners and residents of these communities may not own the land and be subject to pressures from the real estate market and developers.
- Lower levels of risk (shown in yellow) include indirect economic impacts based on potential increases in housing costs. Additionally, further research is necessary to identify other indirect factors that may influence the risk of displacement within the Sunrise Corridor Community.

Figure 55. Heat Map of Direct and Indirect Displacement Risks due to the Sunrise Corridor Gateway Concept



Leveraging Input from Residents and Stakeholders

The Sunrise Corridor Community Visioning process is engaging with residents, businesses, and those commuting to and from to find out what they think is needed for the community to thrive. As part of community conversations, we asked about lived experiences, ideas, challenges, and hopes for the future.

Through open houses, pop-up events, focus groups, stakeholder interviews, and surveys, we heard concerns about displacement for both residents and businesses.

Key findings from the community include:

- Preserve affordable housing options, with an emphasis on manufactured home parks.
- Protect businesses and jobs within the Sunrise Corridor Community, with a focus on small, locally owned businesses.
- Minimize displacement and impacts to residents and business because of future road infrastructure, such as the Gateway Concept
- Incorporate community voices in the planning process, stressing the importance of listening to the needs and preferences of residents, including immigrants and people of color.

What We Heard

“Must be conscientious of displacement as strategies are developed through this process – there are several manufactured home parks in the area and more affordable housing is needed.”

– Community Resident

Shadowbrook Manufactured Home Community

Residents of Shadowbrook, a 55+ manufactured home community along Hwy 212, meet for coffee every Friday. Many have lived at Shadowbrook for decades and their weekly coffee and donuts keep them connected. On a Friday in March 2024, the project team joined the regulars to find out more about their community. Safe access in and out of the community was their top interest. Affordability and long family connections to Clackamas County were also part of the conversation. One resident was concerned that changes in the area could prompt the landowner to change the use of the park, resulting in displacement. He said he had seen this happen years ago in California.

Oak Acres Manufactured Home Community

In June 2024, project team members met with several residents from the Oak Acres community, a manufactured home park along Hwy 212 with over 200 homes, including many families. They shared what they liked about their community – the central location, access to good schools for their children, safety, and more. One family added that affordability was the main reason they had been at Oak Acres for over ten years. They asked if improvements in the area would cause their property taxes to increase.

Steering Committee

As the Steering Committee shaped visioning goals at its second meeting in March 2024, several members shared that they wanted this effort to benefit communities of people who live and work in the area today. Some steering committee members said they wanted to be sure the manufactured home communities are included. One committee member shared that the manufactured home park she lives near has many long-term residents; she said they have great care for their homes and neighbors and are a part of her community she didn't want to lose.

Casa of Oregon

In August 2024, project team members met with Rose Ojeda, the Director of the Manufactured Housing and Cooperative Development Center of Casa of Oregon. They shared some of the issues the Clackamas River Community Cooperative was dealing with that could potentially affect displacement. One of the issues was caused by construction of a subdivision to the north of the community. The creek that runs between Shadowbrook Manufactured Home Community and Clackamas River Community Cooperative was causing erosion due to storm drainage. The creek has been eroding the walls between the two parks. Another factor that could increase the risk of displacement was rent increases. Park owners are regularly increasing rents up to 5-7%, reaching market levels. This has had a significant impact, especially on senior residents. There are currently no effective tools or strategies available to mitigate this situation. There is a rent stabilization law to limit rent increases by 10% but rent increases at unit turnover were not included. Senior citizens feel they are being priced out, forcing them to move in with family or find other alternatives.

Anti-Displacement Strategies and Tools

Anti-displacement strategies will help to ensure Clackamas County is prepared to address the challenges faced by residents and employers in the Sunrise Corridor Community at risk of displacement, especially those faced by the residents of manufactured home parks. The following section provides various strategies for renters, homeowners, and businesses. It features a list of recommended policies and programs that can be adopted to maximize opportunities for residents of neighborhoods experiencing rent and home price increases to stay in their homes. The strategies and tools recommended here provide a diverse range of approaches for addressing residential and business displacement. Some of the strategies assist vulnerable homeowners, while others target vulnerable renters and business owners. A brief description of the level of financial resources needed for the program is provided below for renters, homeowners, and businesses.

For Renters

Policies/programs that help protect renters from being forced to move (i.e., regulating property renting practices, bolstering tenant rights, and providing financial and legal assistance to tenants).

- **Affordable Housing Strike Fund**
 - Affordable housing strike funds provide flexible, below-market financing to fund the preservation of existing affordable multifamily housing by utilizing a combination of public, private, and philanthropic dollars.
 - These funds, also referred to as “strike funds,” or “layered funds,” offer low-cost loans to affordable housing developers and other entities to purchase and preserve existing affordable multifamily housing.
 - **Financial Resources:** Medium-High. Seed financing is typically required from an agency or other government stakeholders to operate a below-market fund targeting preservation for lower-income households. A higher agency investment allows the fund to serve more lower-income families.

- **Tenant Relocation Assistance Ordinance**
 - Supports low-income tenants displaced by redevelopment of mobile home parks by providing advanced notice of the displacement, relocation counseling, and financial assistance.
 - Ordinances vary in structure, including what triggers the notice and fee, who is required to pay the relocation fee, and who is eligible for the assistance.
 - **Financial Resource:** Low- High.
 - Low-Medium: Relocation ordinance requires landlords to pay a fee that covers the relocation assistance and counseling services (for start-up and enforcement costs).
 - High: Local jurisdiction is covering the costs.
 - **Local examples:**
 - Clackamas County’s Title IV Public Improvements ordinance¹ establishes a procedure for hearing appeals of persons who have been or will be displaced from real property by the construction of public improvements. A Relocation Assistance Hearing Officer hears and determines appeals made by relocated persons.
 - In Clackamas County², information has also been provided to the landlords related to rent and relocation rules, lease policies, and exemptions when possible. A specific tenant relocation ordinance is not in effect in Clackamas County.
 - Close³ to the study area, the City of Portland offers relocation assistance. Landlords in Portland must pay relocation assistance to tenants when declining to renew a lease on substantially the same terms, increasing rent 10% or more in a 12-month period, issuing a no-cause notice of termination, and/or issuing a Qualifying Landlord Reason notice of termination.

- **Affordable Housing Preservation Network and Database**
 - Involves creating and maintaining an in-depth database to track mobile home parks at risk of redevelopment as well as operating a network that focuses on the preservation of these facilities.
 - Helps an agency identify at-risk properties, prioritize investment of preservation resources, and lead proactive interventions to save mobile home parks. Tasks are either led by an agency or sourced to a non-profit organization.
 - **Financial Resources:** Low-Medium. Requires moderate ongoing financial support for a staff person to coordinate the creation and maintenance of the database and regularly convene the preservation network.
 - **Local examples:**
 - At the state level, Oregon has the Affordable Rental Housing Preservation⁴ program. This program believes that keeping existing rent-restricted housing affordable and well-maintained over the long term is as important as building new affordable housing.
 - Oregon has an inventory⁵ of affordable housing that comes from the Oregon Housing and Community Services (OHCS), HUD, USDA, Metro, all 20 of Oregon’s Housing Authorities, and many county and city governments.
 - Between 2007 and 2024, the Network for Oregon Affordable Housing (NOAH) coordinated the Oregon Housing Preservation Project (OHPP)⁶, a statewide collaboration of public and private stakeholders dedicated to preserving Oregon’s publicly supported housing. Between 2007 and 2024, OHPP partners collaborated to preserve 408 properties with 20,400 affordable homes, including over 13,000 with long-term federal subsidy contracts valued at \$1.8 billion. The work to preserve properties with federal rental assistance and long-term rent restrictions, as well as manufactured dwelling communities, has been institutionalized through legislation, with \$320 million in dedicated state funding approved by the legislature.

¹ <https://dochub.clackamas.us/documents/drupal/055adc39-ce62-4a19-ba41-b60a9b4cc06b>

² <https://www.clackamas.us/housingauthority/landlords.html>

³ <https://www.multifamilynw.org/news/city-of-portland-relocation-assistance-update---effective-dec-14-2020>

⁴ <https://www.oregon.gov/ohcs/development/pages/housing-preservation.aspx>

⁵ https://www.oregon.gov/ohcs/development/Documents/OAHIWebsite_2022.xlsb

⁶ <https://noah-housing.org/programs/ohpp/>

- **Mobile Home Park Zoning (This strategy is applicable to both renters and homeowners)**
 - Agency rezones mobile home parks by applying a special zoning category to the neighborhoods, requiring Commission (or other body) action to redevelop for other uses. Rezoning mobile home parks to a zoning category that legally restricts the property to use only as a mobile home park reduces the redevelopment risks and helps protect mobile home residents from displacement.
 - Low-cost and high impact tool that protects mobile home park residents from displacement.
 - **Financial Resources:** Low. The adoption of mobile home zoning protections does not require any funding other than coverage of agency staff time to process the rezoning. Public engagement can increase costs moderately depending on level of effort.
 - **Local examples**
 - In June 2024, the City of Happy Valley updated its code of ordinances related to mobile home parks zoning. Article 16.4 in the Title 16 Land Development Code⁷ offers specific “community design standards” and “special standards for certain uses”. These standards cover a variety of attributes related to mobile homes such as density and setbacks, landscaping and screening, roadways and circulation, fire hydrants, streetlights, numbering of mobile home spaces, RV parking area, recreation area, accessory structures, parking, patio, and utility connections, among others.
 - In August 2018, the Bureau of Planning and Sustainability in the City of Portland adopted Comprehensive Plan Policy Amendments⁸ for Manufactured Dwelling Parks. The amendments state the purpose of manufactured dwellings, where these regulations apply, zones allowed, uses allowed, development standards, types of structures allowed, general park requirements (perimeter landscape area and individual outdoor areas), common outdoor areas, trees, and other structures. It also covers aspects such as vehicle access and circulation, pedestrian circulation, individual dwelling units, and non-conforming dwelling units.
 - The Network for Oregon Affordable Housing (NOAH) is raising capital to expand the Oregon Housing Acquisition Fund (OHAF) that gives non-profits and cooperatives access to capital for purchasing manufactured home parks (MHPs) that might otherwise be lost as affordable housing through sale or redevelopment⁹.
- **Co-operative Ownership Models**
 - The CRCC’s model of ownership (co-op) is a great strategy in the protection of mobile home communities and their affordable housing.
 - While some zoning or deeds might allow mobile owners to purchase land before selling it, the residents cannot compete with developers and while they might be given the option to move their homes, they typically either cannot afford to move it or their homes are not in moving shape.
 - Therefore, the co-op model allows residents to be the decision makers in their community and provides a strong sense of community as well as community care given the shared ownership¹⁰.

For Homeowners

Provide homeownership protection by instituting policies/programs to provide homeowners an opportunity to stay in their homes/neighborhoods.

- **Oregon Homeownership Stabilization Initiative (OHSI)**
 - OHSI offers a Fixed Income Support program - also called Principal Reduction and Lien Extinguishment (PRLE) - that provides up to \$50,000 to pay down the mortgage and lower monthly payments.
 - **Financial Resources:** Medium. Financial support is needed to create the center and provide support for ongoing operations. The price tag would depend on the scope of services provided and any geographical targeting. Funding can include philanthropic institutions.
- **Community land trusts (CLTs)**
 - Community land trusts (CLTs) are nonprofit, community-based organizations designed to ensure community stewardship of land. Community land trusts can be used for many types of development (including commercial and retail) but are primarily used to ensure long-term housing affordability.
 - The CLT acquires land and maintains ownership of it permanently. With prospective homeowners, it enters a long-term, renewable lease for the land instead of a traditional sale. The homeowner purchases and owns the vertical house structure. When the homeowner sells, the family earns a portion of the increased property value. The remainder is kept by the CLT, preserving the affordability for future families, and maintaining common areas.
 - The length of the lease (most frequently, 99 years) and the percentage earned by the homeowner vary. Ultimately, by separating the ownership of land and housing, this innovative approach prevents market factors from causing prices to rise significantly, and hence guarantees that housing will remain affordable for future generations.
 - The CLT model can also be used for other community benefit projects like parks and community gardens.
 - **Financial Resource:** High. CLTs need resources to acquire land for the CLT homes, such as grant funds or access to public land or land banking lots. CLTs also need grant funding to subsidize the construction of the houses as well as cover operational costs in the initial stages of CLT development.
 - **Local examples:**
 - The Northwest Community Land Trust Coalition¹¹ (NWCLTC) supports and enhances the activities of the community land trusts (CLTs) based in Washington, Oregon, Idaho, Alaska, and Montana so that they can provide permanently affordable access to land for housing and other community needs that serve low- and moderate-income members of their communities.

⁷ <https://ecode360.com/43529967#43526376>

⁸ https://www.portland.gov/sites/default/files/2020-02/manufacturedpark_asadopted_082218.pdf

⁹ https://noah-housing.org/programs/manu/?EntryId=46424&Command=Core_Download&language=en-US&PortalId=13&TabId=1569

¹⁰ [What is a ROC? - ROC USA](https://www.nwcltc.org/)

¹¹ <https://www.nwcltc.org/>

- The Coalition of Oregon Land Trusts (COLT)¹² works with individuals and communities to conserve land. In state and federal policy issues, they represent the interests of land trusts and work to advance conservation in Oregon. Every year COLT’s board of directors develops a policy platform to guide its collective work.
 - Proud Ground is the largest community land trust in the Pacific Northwest. They create permanently affordable homeownership opportunities for first-time homebuyers in Multnomah, Clackamas, Washington, Clark, Jackson, and Lincoln Counties using the Community Land Trust Model¹³.
- **Community Preference Policy**
 - Community preference policies further displacement mitigation goals and remediate prior racial injustices. Several agencies and nonprofit organizations across the United States are utilizing community preference policies for their affordable housing programs to redress prior racial injustices (such as displacement precipitated by urban renewal and freeway construction), further their displacement mitigation goals, and help stabilize communities.
 - Policies are typically created at a neighborhood scale and provide priority placement in a neighborhood or group of neighborhoods to low-income applicants who have been displaced from their neighborhood, are current residents at risk of displacement, or are descendants of displaced residents. Preference policies do not actually produce affordable units but instead provide preference for units that are produced by other means.
 - **Financial Resources:** Low. A community preference policy requires minimal financial resources. To ensure effective implementation, however, funding might be needed for marketing and outreach to residents targeted by the policy.
 - **Local examples:**
 - The City of Portland has a community preference policy¹⁴ that aims to address the harmful impacts of urban renewal and displacement in the North and Northeast Portland community. It is a housing waitlist developed to support current and former residents who have been involuntarily displaced or are at risk of displacement from the region. Applicants with historical ties to the area are considered before applicants without a previous history of residence in the area for existing and upcoming rental and homeownership opportunities.
 - The City of Portland’s N/NE Neighborhood Housing Strategy uses a system of preference points to move people to the top of the waitlist. A policy must be carefully crafted to avoid violating the Fair Housing Act.
- **Agency and tenant right-to-purchase preservation program**
 - Provides tenants and agencies with the right to purchase government-assisted mobile home parks when the owner decides to sell the property or exit the affordable housing program.
 - Powerful tool for minimizing tenant displacement and creating low-income homeownership opportunities in gentrifying neighborhoods.
 - **Financial Resource:** Medium to high, depending on stage of displacement and condition of the property. Agency support for predevelopment, acquisition, and rehabilitation costs will help ensure success of the program. Funding for capacity building and technical assistance is critical. Local financial resources are less necessary for mobile home park acquisitions, especially in early-stage displacement neighborhoods, given the lower costs and greater national resources available to support mobile home preservation.
 - **Local Examples:**
 - Clackamas County has a renter’s handbook¹⁵ on termination notices and evictions. The packet contains information about termination notices and the eviction court process, detailed brochure on the eviction court process including possible defenses one may have, and a list of attorneys who will represent tenants for free in eviction court if they think one has a good defense.
 - CASA of Oregon has worked with several mobile home parks throughout the region (approx. 26), including helping tenants purchase or create a Co-op and provide funding strategies.

For Small Businesses

- **Commercial Façade Improvement Programs**
 - Commercial Façade Improvement Programs encourage and assist commercial property owners and tenants to improve their buildings’ exteriors and storefronts through financial incentives, such as matching grants and loans, tax abatements, and design assistance. These programs often focus on commercial properties in both historic and non-historic areas. Stakeholders are government or public agencies, small businesses, and community-based organizations (CBOs).
 - **Financial Resource:** Medium-High. Funds can be provided as a matching grant or a loan. In seeking funding and applying for funding, sometimes the tenants are required to provide matching funds that many small businesses do not have. It is often paired with design assistance and typically allocated from various sources, most commonly federal and state community and economic development, housing, and revitalization grants.
 - **Local Examples:**
 - **Prosper Portland** adopted revised financial assistance guidelines¹⁶ for the Storefront Improvement Program in Resolution No. 6836. The purpose of the Storefront Improvement Program is to revitalize commercial areas to eliminate blight, enhance neighborhood livability, and improve the physical condition of buildings - primarily ground floor commercial space. The Storefront Improvement Program provides a matching grant of up to 75% of the costs of eligible work (as described below) to assist property owners and business tenants in rehabilitating their storefronts up to the maximum amounts set forth below:
 - Exterior Façade Improvements: up to \$20,000 per building.
 - Signage, Lighting and Awning Incentive: up to an additional \$12,000 for certain signage, lighting, and awning elements included in the project.

¹² <https://oregonlandtrusts.org/>

¹³ <https://www.proudground.org/who-we-are>

¹⁴ <https://www.portland.gov/phb/nnehousing/preference-policy>

¹⁵ <https://dochub.clackamas.us/documents/drupal/22190a52-4d33-42db-9419-e7a3034a58a8>

¹⁶ <https://prosperportland.us/wp-content/uploads/2016/08/Resolution-6836.pdf>

- Exterior Façade Improvements - Downtown Retail Core Incentive: A total incentive of up to \$100,000 (maximum amount of \$112,000 when combined with the Signage Lighting and Awning incentive) may be approved for key projects that fulfill the vision of the 2009 Portland Downtown Retail Strategy.
 - Business Tenant Signage Incentive: In the event the property has exhausted all available storefront funds, ground floor business tenants may be eligible for up to \$2,000 for permanent signage. This incentive is only available for ground floor business tenants whose occupancy of the space commenced less than one year prior to applying for the incentive.
 - **The City of Happy Valley** has the Economic Development Division¹⁷ with the mission to promote economic growth through the attraction of new business and industry and the retention of existing businesses by providing resources, be a sound economic competitor, and pursue grant funding opportunities and tax abatement programs.
 - **Clackamas County's** Development Agency had a façade improvement program and other incentives as part of its Government Camp Urban Renewal District¹⁸.
- **Neighborhood Business Incubators**
 - **Neighborhood business incubators** are designed to help startup businesses grow and succeed by providing free or low-cost workspace, mentorship, access to investors, and in some cases, working capital. They also often provide educational programs, connections to e-commerce sites or other technologies to increase their sales, and temporary vending opportunities, such as farmers markets or pop-up spaces.
 - **Financial Resource:** Medium-High. Incubators typically receive support for start-up capital and operating expenses from governmental sources.
 - **Local Examples:**
 - The Happy Valley Business Alliance (HVBA)¹⁹ is a community-centric organization that supports and connects Happy Valley business owners and brings attention to their businesses, attractions, and upcoming special events. Members of the HVBA have an advantage in local business, with benefits that include opportunities for mentoring, networking, business growth, and education.
 - The City of Tigard has a business incubator known as an Opportunity Café²⁰. It provides entrepreneurs with critical ingredients like space and advising to start their business. The 400-square-foot micro-café located in the Tigard Library is a key asset in an economic mobility program reducing start-up costs for first-time entrepreneurs. It also gives Library patrons their most requested improvement, a café! Every two years, possibly more frequently, a new entrepreneur will be invited into this space to launch their business. The products and people will change over time as entrepreneurs learn how to run a business, perfect their craft, and advance to new opportunities.
- **Legacy Business Programs**
 - **Legacy business programs**²¹ are designed to preserve longtime businesses that contribute to a neighborhood's history, identity, and character. Programs are often established by local jurisdictions, business associations, or community-based organizations and provide small businesses with grants, technical assistance, and marketing and branding services. These programs also offer financial incentives, including grants, to commercial landlords to retain legacy businesses. Stakeholders are small businesses, government or public agencies, and community-based or nonprofit organizations.
 - **Financial Resource:** Medium-High. In some areas, legacy businesses are required to apply for funding. In others, they must be nominated by an elected official or small business agency. Businesses are often selected based on their tenure, community contribution, and size.
 - **Local Examples:**
 - **Restore Oregon** is an organization that works on the front lines and behind the scenes to empower Oregonians to reimagine and transform their communities through the preservation and reuse of historic and cultural places. They have a Legacy Business Program²² known as "Celebrating Mom and Pop Shops" to celebrate living historic resources in a community and help to preserve more non-architectural resources. Such programs can also increase the diversity in types of resources preserved by establishing equitable practices, and can be celebratory, rather than regulatory. Legacy business programs can operate in different ways depending on local needs. They can offer financial assistance, technical assistance, protective measures against displacement, preservation incentives, and marketing assistance and promotion. Such programs can be created in any community and can fit into already existing support services.
 - **In Happy Valley**²³, support is provided in various ways for businesses to locate in the region. Some of the advantages for businesses to locate in Happy Valley include lower property taxes, streamlined and business-friendly permitting, desirable demographics, and connected business community.
- **Tax Abatements**
 - **Tax abatements** are used to promote economic and community development. This credit eliminates or significantly reduces property taxes for owners buying commercial or retail property. It can be temporary, last from a few months to years, or continue indefinitely.
 - **Financial Resource:** Low. A local agency, state treasury, or the federal government offers tax abatements to properties in certain areas, particularly historic sites, or those in need of revitalization. Some properties may have tax abatements attached to them or require buyers to apply to be eligible. Owners of commercial buildings with tax abatements often need to adhere to specific time frames and restrictions, such as making property improvements or maintaining a certain quality of maintenance. The agency should think carefully about how to design a tax abatement that addresses the small business needs without compromising the ability to fund other priorities.

¹⁷ <https://www.happyvalleyor.gov/business/economic-development-division/>

¹⁸ <https://www.clackamas.us/development/gcamp.html>

¹⁹ <https://www.happyvalleyor.gov/community/community-services/happy-valley-business-alliance/>

²⁰ <https://www.tigard-or.gov/business-development/opportunity-cafe>

²¹ <https://antidisplacement.org/tool/legacy-business-programs/>

²² <https://restoreoregon.org/2020/06/24/legacy-business-programs/>

²³ <https://www.happyvalleyor.gov/business/support-for-businesses/>

- **Local Examples:**
 - Happy Valley’s economic community development program has an Annexation Program²⁴ that describes some of the advantages of owning a home or property or operating a business in Happy Valley. Happy Valley’s tax rate of \$0.67 per \$1,000 assessed value is the second-lowest municipal rate in the Portland Metropolitan Region.
- **Technical Assistance and Business Counseling**
 - **Technical assistance** is a fundamental component of equitable economic development that can help BIPOC- and immigrant-owned small businesses overcome historic inequities in accessing resources to help them succeed. Technical assistance can bridge the access gap that exists between business owners and government and other assistance programs because of language and cultural factors as well as lack of trust in or familiarity with programs and institutions. Technical assistance and counseling often include business planning, accounting, license application assistance, marketing, and tax filing. Language assistance can also be provided, such as English as a Second Language (ESL) programs and cultural competency training for immigrant entrepreneurs.
 - **Financial Resource:** Low to Medium. Local agency, non-profit.
 - **Local Examples:**
 - The Happy Valley Business Alliance²⁵ and the North Clackamas Chamber of Commerce provide businesses with support, knowledge, networking opportunities, and opportunities to be involved in community events.
 - The North Clackamas Chamber of Commerce has a “Business Education Series²⁶” which is a collaborative approach in delivering valuable professional training to entrepreneurs, small, and mid-size businesses. This program is specifically developed to enable business-owners to be more strategic and focused on achieving goals and delivering greater value to the customer base. Training is provided to teach how to streamline processes, build strategic plans and develop long-lasting, effective best practices to take businesses to the next level.
 - Business Oregon’s Technical Assistance for Underrepresented Businesses (TA) program²⁷ funds organizations that support historically underrepresented and underserved small businesses. It is a newer program, established by the Oregon Legislature in 2021, and builds on a federally funded pilot to help businesses respond to the COVID-19 pandemic. TA providers are selected every two years through a competitive process, reflecting the program’s commitment to ensuring that technical assistance is widely available and accessible to small businesses. This program is designed to help ensure that the economic recovery is equitable and does not perpetuate long-standing disparities.
- **Streamlined Permitting**
 - Streamlined permitting and licensing processes can help facilitate new small business startups, keep costs down for businesses, and facilitate reinvestment that benefit existing businesses. A comprehensive review of all steps in a government’s development approval process can identify factors that deter new commercial and small business construction and redevelopment. The goal is to create a clearer, simpler process, as small businesses are often challenged by the time and cost it takes to get permit approvals. Understanding the permit process and barriers that small businesses face can help local leaders reduce or eliminate barriers, stimulate development activity, and provide faster approval.
 - **Financial Resource:** Low. Coverage of agency staff time to process the permit application. However, may take more resources to change the culture and regulations of permitting processes.
 - **Local examples:**
 - The City of Happy Valley²⁸, in their Economic Development Program, mentions being business-friendly and offering fast and simplified procedures for licensing, building permitting, and land-use transactions.
 - To apply for a business license, applicants can visit the new online system HVWORKS²⁹. The licensing of trades, shops, occupations, professions, and businesses in the City of Happy Valley is regulated through Ordinance 124, with fees established through Resolution 94-05.
 - Clackamas County has an online permitting system known as Development Direct that aids in speeding up permits, when possible, for contractors and residents³⁰.
- **Affordable Workspace Policy**
 - Affordable workspace policies provide certain types of businesses space in new developments at below-market rents, including startups and small- and medium-sized enterprises. Affordable workspace is provided by developers in several ways: it can be leased and managed by an affordable workspace provider approved by the local government; managed by the owner of the new development; or leased by the property owner to one or more businesses approved by local government. Workspace providers are usually commercial property owners, social enterprises, or foundations.
 - The policies are implemented through planning obligations that allocate a percentage of new commercial development space over a set size for affordable workspace. The policy requires developers of residential or mixed-use projects on employment land to provide and subsidize affordable workspace. The space is managed by workspace providers who are appointed by developers to operate offices, retail, kitchens, studios, and other types of commercial spaces. Workspace is typically used by multiple businesses, including startups and early-stage businesses; small businesses focused on creative production, such as artists, design makers, and musicians; and non-profit and charitable organizations.
 - In terms of strengths, workspaces can provide small businesses with flexible and affordable lease terms and coworking space, mobile workspaces, hot desks, or open offices. In terms of challenges, developers are often interested in keeping the amount of affordable workspace low to maximize profit and may provide only minimum amounts. They can deter property owners from investing in or renovating existing and especially older buildings.
 - **Financial Resource:** High. Subsidized through the operations of the residential development.

²⁴ <https://www.happyvalleyor.gov/business/economic-community-development/annexation-program/>

²⁵ <https://www.hvba.biz/>

²⁶ <https://www.yourchamber.com/business-education-series/>

²⁷ https://www.oregon.gov/biz/programs/technical_assistance_program/pages/default.aspx

²⁸ [https://www.happyvalleyor.gov/business/business-](https://www.happyvalleyor.gov/business/business-licenses/#:~:text=To%20apply%20for%20a%20business,established%20through%20Resolution%2094%2D05)

[licenses/#:~:text=To%20apply%20for%20a%20business,established%20through%20Resolution%2094%2D05](https://www.happyvalleyor.gov/business/licenses/#:~:text=To%20apply%20for%20a%20business,established%20through%20Resolution%2094%2D05)

²⁹ <https://happyvalleyor-energovweb.tylerhost.net/apps/selfservice#/home>

³⁰ <https://www.clackamas.us/development-direct>

- **Smoke Free Policies for Public Spaces**

- As part of the Sunrise Corridor Community Visioning project, Clackamas County Public Health Division's Tobacco Prevention and Education Program would like to propose implementing smokefree policies for new and existing public spaces including but not limited to parks, fields, picnic areas, play areas, and walking paths. Implementing smokefree policies for new and existing public spaces in the Sunrise Corridor aligns with Public Health and Environment strategies. Other jurisdictions in Clackamas County, including the neighboring City of Happy Valley, have already adopted tobacco free parks policies to protect the public's health.

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