

Thursday, I 6:45 PM – 8	March 7, 2024 9:00 PM	
nNrZz09 Or one tap	amascounty.zoom.us/j/85998212310?pwd=R1Irb3AyOStaV3IIWk	4vVW9GV
AGENDA 6:45 p.m.	Pledge of Allegiance	
	Welcome & Introductions Chair Paul Savas & Mayor Brian Hodson, Co-Chairs	
	<ul><li>Housekeeping</li><li>Approval of February 1, 2024 C4 Minutes</li></ul>	Page 04
6:50 p.m.	<ul> <li>STIF Funding and Local Transit Service</li> <li>Presenting: Kristina Babcock, Clackamas H3S</li> <li>STIF Funding Presentation</li> </ul>	Page 07
7:10 p.m.	<ul> <li>Supportive &amp; Public Housing Update Presenting: Clackamas H3S - Adam Brown, Vahid Brown, Devin Ellin</li> <li>Updates on the Supportive Housing Services Program &amp; Public Housing Repositioning</li> <li>Clackamas County Public Housing Repositioning FAQs</li> </ul>	Page 20
7:30 p.m.	<ul> <li>ODOT Supplemental EA Comment Period</li> <li>Presenting: Jamie Stasny, Clackamas DTD</li> <li>Draft Extension Request Letter</li> </ul>	Page 47
7:40 p.m.	<b>Legislative Update</b> Presenting: Trent Wilson, Clackamas Government Affairs	
7:45 p.m.	<ul> <li>Updates/Other Business</li> <li>JPACT/MPAC Updates</li> <li>C4 Retreat Planning</li> <li>Other Business</li> </ul>	

8:00 p.m. Adjourn

#### **2024** General Information



Current Voting M	embership	C4 Exec	C4 Metro	C4 Rural	JPACT	MPAC	R1ACT
Clackamas County	Commissioner Paul Savas						
Clackamas County	Commissioner Ben West						
Canby	Mayor Brian Hodson						
CPOs	Kenny Sernach	$\bullet$					
Estacada	Mayor Sean Drinkwine						
Fire Districts	Matthew Silva (Estacada Fire District)						
Gladstone	Mayor Michael Milch						
Hamlets	Mark Hillyard						
Happy Valley	Council Brett Sherman						
Johnson City	Vacant						
Lake Oswego	Mayor Joe Buck						
Milwaukie	Councilor Rebecca Stavenjord						
Molalla	Mayor Scott Keyser						
Oregon City	Commissioner Adam Marl						
Portland	Vacant						
Rivergrove	Councilor Doug McLean						
Sandy	Mayor Stan Pulliam						
Sanitary Districts	Paul Gornick (Oak Lodge Water Services)						
Tualatin	Councilor Valerie Pratt						
Water Districts	Sherry French (Clackamas Water District)						
West Linn	Mayor Rory Bialostosky						
Wilsonville	Mayor Julie Fitzgerald						

#### Current Ex-Officio Membership

MPAC Citizen Rep	Ed Gronke
Metro Council	Councilor Christine Lewis
Port of Portland	Emerald Bogue
Rural Transit	Todd Wood (Canby Area Transit)
Urban Transit	John Serra (TriMet)

#### Frequently Referenced Acronyms and Short-forms:

#### Related to the Clackamas County Coordinating Committee (C4)

#### C4 Metro Subcommittee

#### C4 I-205 Diversion Subcommittee

CTAC: Clackamas Transportation Advisory Committee (C4 Transportation TAC)

#### **Related to Metro and Metro Committees**

JPACT:	Joint Policy Advisory Committee on Transportation (Metro)
MPAC:	Metro Policy Advisory Committee (Metro)
TPAC:	Transportation Policy Advisory Committee (JPACT TAC)
MTAC:	Metro Technical Advisory Committee (MPAC TAC)

#### Related to the Oregon Department of Transportation (ODOT) and Tolling

ОТС	Oregon Transportation Commission (ODOT policy decision body)
Region 1:	ODOT's geographic designation for the metro area + Hood River
R1ACT: ODOT I	Region 1 Advisory Committee on Transportation
UMO:	ODOT's Urban Mobility Office
RTAC:	ODOT's Regional Tolling Advisory Committee
STRAC: ODOT'S	s State Tolling Rules Advisory Committee
EMAC: ODOT'S	s Equity Mobility Advisory Committee (for tolling)

#### **General Transportation Acronyms**

- **STIP:** State Transportation Improvement Plan (ODOT)
- **RTP:** Regional Transportation Plan (Metro)
- **TSP:** Transportation System Plan (Local county and cities)
- HCT: High Capacity Transit
- UPWP: Urban Planning Work Program

#### **General Housing and Land Use Acronyms**

- H3S: Clackamas County's Health, Housing, and Human Services Department
- HACC: Housing Authority of Clackamas County
- **SHS:** Supportive Housing Services (Regionally approved funds for housing services)
- **OHCS:** Oregon Housing and Community Services
- LCDC: Land Conservation and Development Commission
- **DLCD:** Department of Land Conservation and Development
- UGB: Urban Growth Boundary
- UGMA: Urban Growth Management Agreement



#### Thursday, February 1, 2024 Virtual Meeting via Zoom

#### Attendance:

<u>Members:</u>	Canby: Brian Hodson, Traci Hensley; Clackamas County: Paul Savas, Ben West; CPOs: Martin Meyers, Marjorie Steward (Alt); Fire District: Matthew Silva; Gladstone: Michael Milch; CPOs: Kenny Sernach; Happy Valley: Brett Sherman; Milwaukie: Rebecca Stavenjord; Metro: Christine Lewis; Molalla: Scott Keyser; MPAC Citizen: Ed Gronke; Lake Oswego: Joe Buck; Oregon City: Adam Marl; Sewer District: Paul Gornick; Transit: Dwight Brashear (SMART, Urban); Todd Wood (CAT); Tualatin: Valerie Pratt; Water District: Sherry French (CRW); West Linn: Rory Bialostosky; Wilsonville: Julie Fitzgerald, Caroline Berry
<u>Staff:</u>	Bryan Hockaday (PGA)
<u>Guests:</u>	Grant O'Connell (TriMet); John Serra (TriMet); Tom Markgraf (TriMet); Kristina Babcock (H3S); Trent Wilson (PGA)

### The C4 Meeting was recorded and the audio is available on the County's website at <u>https://www.clackamas.us/meetings/c4/c4meetings</u>. Minutes document action items approved at the meeting, as well as member discussion.

Agenda Item	Action
Approval of January 4,	Minutes approved
2024 C4 Minutes	
Forward Together 2.0: A long-range plan for TriMet Service	TriMet began Forward Together (FT) 1.0 to help return transit service that was cut or limited during the pandemic, and FT 2.0 will guide more long-term planning. Community feedback the fall service plan proposal was incorporated in FY25 revisions that also reflect the impact of operator
	shortages. Given the workforce challenges, service on certain lines will not be extended as initially planned. TriMet historically has only achieved 4% service growth, so the 10% growth plan proposed last fall may have been overly ambitious. The revised plan includes a 6% growth plan. Regionally, Clackamas County was least to be impacted by the reduced service plans.
	Notable changes in Clackamas County include: Line 76 connection from Beaverton Transit Center to Oregon will now only include peak, weekday service instead of the planned 7-day service.
	TriMet reports it is successfully working to recruit more transit operators

	and offering financial incentives, including signing bonuses.
	To shape Forward Together 2.0, TriMet is conducting a study and solicited input from local transportation planning staff to help determine what level of investment is needed to meet goals in the RTP and TriMet Vision 2030. TriMet expects the report to be completed by July 2024.
Clackamas Transit Services and STIF Update	STIF funding is based on where people work, not where they live. Based on 2020 Census, 34% of ClackCo residents live outside the TriMet Service District. In contrast, only 2% of MultCo residents live out of the service district.
	Regional coordination funding is also set aside by TriMet and provided to small transit operators (about \$2 million). Clackamas coordinates last mile shuttle service with four local providers, as well as with Mt. Hood transit service. ClackCo transit providers convene weekly coordination meetings to maximize service within the limited constraints of STIF funding. Each provider was able to expand service with FY 22-23 STIF funding and has long-term goals to continue expanding service while keeping fares low or free.
	Legislative intent of STIF funds is determined by location of employers, and C4 members discussed striking a better balance based on where people live. Using census track data, initial projections show funding would increase to Clackamas and local transit providers if STIF funding was determined by residents and not employers.
Legislative Update and 2024 Legislative Session Outlook	The 2024 Legislative short session began Feb. 5, and 188 bills were posted. The focus of session will be on the Governor's housing bill, as well as addressing Measure 110 and issues related to addiction and recovery. LOC is coordinating with cities to develop a housing infrastructure needs list, which currently amounts to \$1 billion in identified needs.
	Beyond the work led by SSTP to collect additional community feedback on tolling, transportation issues are not expected to receive much focus during the short session. However, SSTP will releases a report with recommendation at the end of session in March. It is anticipated that a statewide transportation funding package will be developed during the 2025 session.
	Additionally, the Oregon Trucker's Asoc. recently filed a lawsuit asserting an inequity in the weight mile tax paid by truckers and the gas tax assed on light vehicles. Three bills were filed with the goal of addressing this issue. Estimates suggest that it would take a 30 cent gas tax increase to reach parity with VMT.
Updates/Other Business	JPACT- members received a presentation on Climate Pollution Reduction

Grant (CPRG). Staff are developing a list of shovel ready projects for these federal grant funds. Also heard a presentation on regional freight, and Trent was part of a panel that discussed major challenges and opportunities with transportation funding. The lack of public trust with ODOT was acknowledged as one of several challenges. Local and regional collaboration will be critical when looking to the development of a 2025 state funding package.
MPAC – Members also received a CPRG presentation and had a robust discussion on economic development. The economy and the labor market have cooled, but Oregon fortunately has a productive workforce. Historically, Oregon's economic growth has been tied to population growth but now our population is declining. Additionally, Councilor Sherman was appointed vice chair of MPAC and will be chair next year.
C4 Retreat Planning – members are asked to complete an initial planning survey, which includes consideration of agenda items and the option of either a June or Sept. retreat.

Adjourned at 8:19 p.m.

# STIF Funding

KRISTINA BABCOCK – CLACKAMAS COUNTY

## STIF FUNDING

- HB 2017 Employee based payroll tax
  - Collected based on where employees work not where they live
- STIF Funds
  - In District Funds
  - Out of District Funds
  - Regional Coordination Funds
  - Old STF Funds
- Goals
  - Expand and improve existing transit services
  - Increase connections between transit providers
  - Make transportation more equitable and affordable
  - Provide transportation services for Older Adults and Disabled populations

## 2023 POPULATION DATA

2023 POPULATION NUMBERS		
	Total	Percentage
Tri County Population (Total)	1876240	
TriMet District Population	1688837	
Outside TriMet District Population	187403	9.99%
Washington County Population	617327	
TriMet District Population	585123	
Outside TriMet District Population	32204	5.22%
Multnomah County Population	826865	
TriMet District Population	820251	
Outside TriMet District Population	6614	0.80%
Clackamas County Population	432048	
Clackamas County TriMet District Population	283463	
Clackamas County Outside TriMet District Population	148585	34.39%

- Population data on where people live from Clackamas County GIS
- Clackamas County demographics significantly different

## CURRENT METHOD

- Collections distributed via formula based on where people work
- STIF In-District Formula funds
  - Distributed to TriMet
  - TriMet uses a portion of these funds for Regional Coordination (Shuttles)
- STIF Out-of-District Formula funds
  - Distributed to each County
    - Clackamas County has 5 different providers that the allocation is shared between based on an agreed upon allocation formula
    - Washington County's dollars are shared between the County and SMART

## CURRENT STATE

TRI	COUNTY AREA	
FY26	Allocation	Percentage
TriMet	\$66,019,768.00	95.24%
<b>Clackamas County</b>	\$ 2,474,949.00	3.57%
Washington	\$ 761,921.00	1.10%
Multnomah	\$ 64,741.00	0.09%
Total	\$ 69,321,379.00	
FY27	Allocation	Percentage
TriMet	\$ 69,355,981.00	95.24%
<b>Clackamas County</b>	\$ 2,600,016.00	3.57%
Washington	\$ 800,424.00	1.10%
Multnomah	\$ 68,012.00	0.09%
Total	\$72,824,433.00	

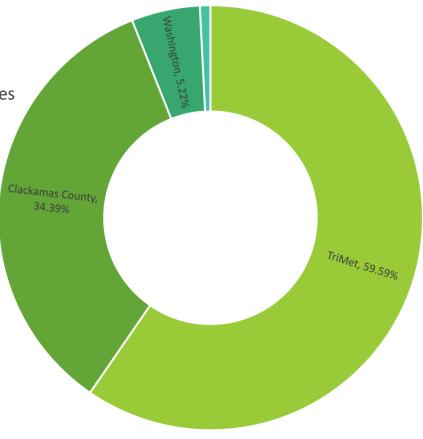
CLAC	KAMAS COUNTY	ONLY
FY26	Allocation	Percentage
TriMet	\$ 7,586,148.88	75.40%
<b>Clackamas County</b>	\$ 612,115.00	6.08%
SCTD	\$ 273,169.00	2.72%
SMART	\$ 1,088,177.00	10.82%
CAT	\$ 348,038.00	3.46%
SAM	\$ 153,450.00	1.53%
Total	\$ 10,061,097.88	
		\$ 2,474,949.00
FY27	Allocation	Percentage
FY27 TriMet	Allocation \$ 7,737,871.86	Percentage 74.85%
TriMet	\$ 7,737,871.86	74.85%
TriMet Clackamas County	<ul><li>\$ 7,737,871.86</li><li>\$ 643,047.00</li></ul>	74.85% 6.22%
TriMet Clackamas County SCTD	<ul><li>\$ 7,737,871.86</li><li>\$ 643,047.00</li><li>\$ 286,973.00</li></ul>	74.85% 6.22% 2.78%
TriMet Clackamas County SCTD SMART	<ul> <li>\$ 7,737,871.86</li> <li>\$ 643,047.00</li> <li>\$ 286,973.00</li> <li>\$ 1,143,166.00</li> </ul>	74.85% 6.22% 2.78% 11.06%
TriMet Clackamas County SCTD SMART CAT	<ul> <li>\$ 7,737,871.86</li> <li>\$ 643,047.00</li> <li>\$ 286,973.00</li> <li>\$ 1,143,166.00</li> <li>\$ 365,625.00</li> </ul>	74.85% 6.22% 2.78% 11.06% 3.54%

## ALTERNATIVE METHODS

- 1. Collections distributed based on residence
- 2. Collections distributed similar to FTA 5311 Formula
- 3. Collections distributed adjusting for residence

## ALTERNATIVE #1

- Collections distributed based on residence
- Use 2023 population data for each County
  - Start by distributing Tri-County funds based on out-of-district percentages
    - Clackamas County: 34.39%
    - Washington County: 5.22%
    - Multnomah County: 0.8%
  - Remaining amount would go to TriMet
    - 59.59%
- Projections
  - FY26 Clackamas County: \$23,840,214
  - FY27 Clackamas County: \$25,044,944

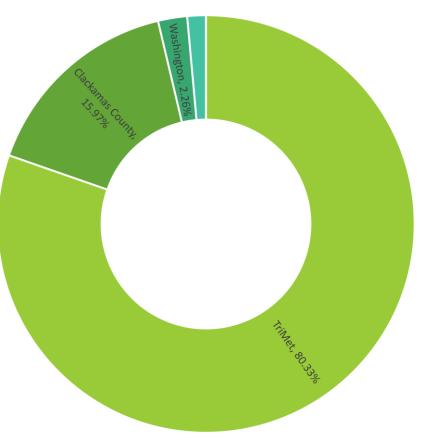


TriMet Clackamas County Washington Multnomah

## ALTERNATIVE #2

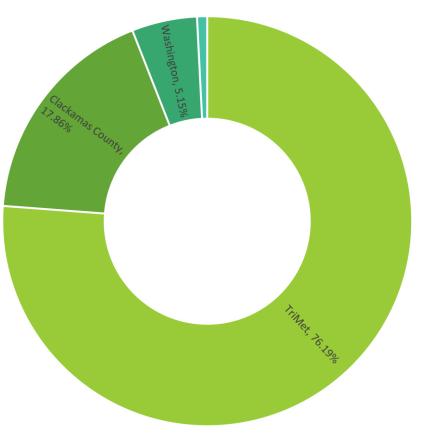
#### • Collections distributed similar to FTA 5311 Formula

- Minimum distribution for each Transit Provider
  - Large enough to impact transit operations (\$500k +)
  - Minimum distribution based on current services (60% mileage and 40% Rides Provided)
- Remaining dollars allocated based on residence
  - First to TriMet: 90.01% (2023 In-District Population)
  - Remaining split among Counties
    - Numerous allocation methods
- Projections: more than current state and less than alternative #1



## ALTERNATIVE #3

- Collections distributed adjusting for residence and regional transportation goals
- Use current initial allocations
  - TriMet: 95.24%
  - Clackamas County: 3.57%
  - Washington County: 1.10%
  - Multnomah County: 0.09%
- Adjust initial allocation for out-of-district residence
  - TriMet: 76.19%
  - Clackamas County: 17.86%
  - Washington County: 5.15%
  - Multnomah County: 0.80%
- Projections: more than current state and less than alternative #1



TriMet Clackamas County Washington Multhomah

## ADDITIONAL FUNDING

• Alternate distribution methods could increase Clackamas County Funding significantly

#### • Capital / Infrastructure

- Electrification of fleets
- Additional vehicles
- Operations buildings

#### • Operations

- Expansion based on local Transportation Development Plans
- Increased frequency of service
- Increased connectivity between providers
- Demand Response Services
  - 65+ and disabled residents of Clackamas County
  - Curb to curb services; increase independent living

## HB2017 RULES

- Distribution method changes would need to be done with changes to the HB2017 Rules
- Current rules state:
  - The Qualified Entity may use procedures of its choice to distribute STIF Formula Fund moneys;
  - Qualified Entities shall work collaboratively with Public Transportation Service Providers and other potential Sub-Recipients, as relevant, to develop a method for sub-allocating STIF Formula Fund moneys to Public Transportation Service Providers.
- Develop more concrete distribution rules
  - Other factors to consider:
    - Residence
    - Current transit service
    - Regional transit goals
    - Connectivity
    - Etc.

## Next Steps

- Discussions with TriMet as current QE for potential distribution model changes
- Discussions with OTA / ODOT to push rule changes within HB2017

- Working with local jurisdictions to ensure transit specific planning is in place
  - STIF requires transit projects be in local or Regional Transit Plans

## QUESTIONS

Clackamas County

SMART

CAT

SCTD

SAM

kbabcock@clackamas.us

www.rideclackamas.org



### Updates on the Supportive Housing Services Program & Public Housing Repositioning

Clackamas County Coordinating Committee March 7, 2024

Health, Housing & Human Services H

H

A

H

H

Ц Ц

## upportive Housing Services

2024 Update

### Supportive Housing

### Eviction Prevention

## Safety off the Streets

### Infrastructure

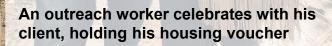


### **Permanent Supportive Housing**

### 738 households 1,218 people

11 service providers

July 1, 2021 – December 31, 2023



### **Rapid Re-Housing**

### 147 households 316 people

July 1, 2021 – December 31, 2023





Rosie, a peer support specialist, helps residents with the tools they need to remain housed and thrive

### **Housing Retention**

PSH 98.3% RRH 95.8%

FY 2022-2023 Annual Report

### **Eviction Prevention**

## 877 households 2,012 people

July 1, 2021 – December 31, 2023



Helen, a resident of Fuller Station, an affordable housing development



# Transitional Housing & Shelter

**22-23** 140 units **788 people** 

FY 2022-2023 Annual Report

"I feel happy to be alive because I didn't know if I was going to be for a long time."

Kathy's story



Carlos Benson Martinez conducts community outreach

### **Advancing Equity**

## \$3.62M invested in

6 culturally specific providers

#### **Dedicated RLRA vouchers**

### Coalition of Communities of Color

FY 2022-2023 Annual Report

### Coordinated Outreach Program

First-ever in the county

579 households served

6 service providers

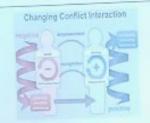
By-name list

FY 2022-2023 Annual Report

Outreach providers build relationships while meeting basic needs such as food provision and connections to healthcare and housing

NINABRO GENERATION + SAMAMAB DIMADRO GENER

#### EP THREE: STRENGTH EXPLORATION



ients may feel dependent – we can help remember times of interdependence.

**Coordinated Housing Access training** 

### Coordinated Housing Access Hotline

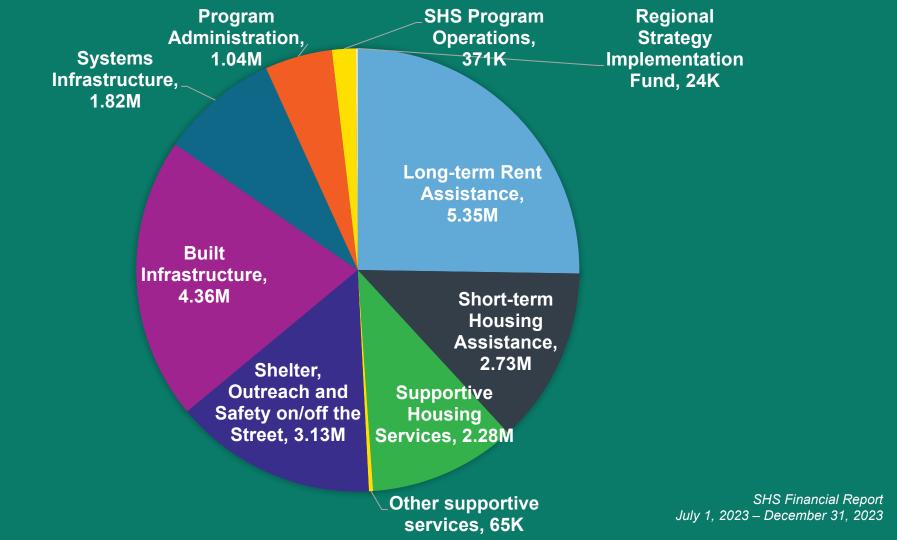
↓ backlog from 1,800 to 0

Live service every day

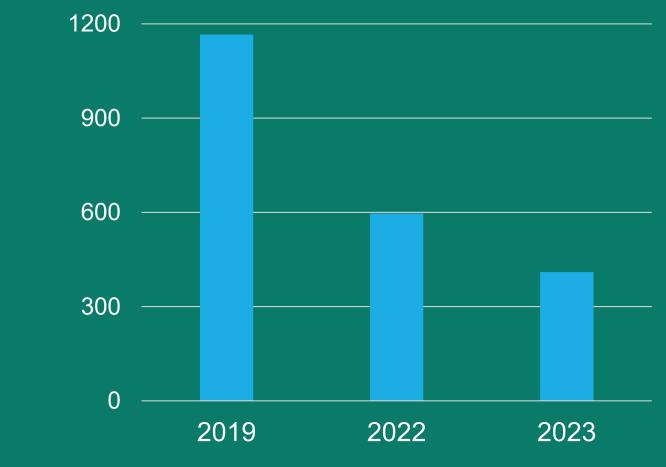
Average 2-minute wait

CHA staff team doubled

FY 2022-2023 Annual Report FY 2023-2024 Q1 <u>Report</u>



Individuals Experiencing Homelessness in Clackamas County



Point In Time Count Reports, 2019, 2022, 2023

### Looking Ahead

Recently launched services for youth and survivors of violence

Health-housing integration

Clackamas Village

New resource center

### Housing Authority of Clackamas County: Repositioning Public Housing



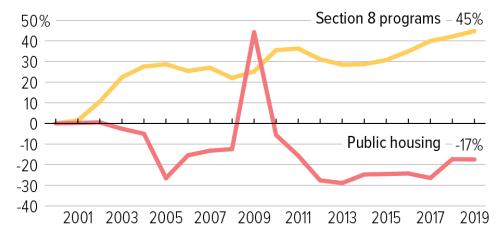
### What is repositioning?

- Federal disinvestment has resulted in aging public housing with unmet capital needs
- U.S. Department of Housing & Urban Development allows agencies to "reposition" portfolios and develop locally appropriate strategies to preserve affordable housing, including by redeveloping and/or disposing of assets

#### Public Housing Funding Has Dropped While Section 8 Funding Has Responded to Cover Rising Needs

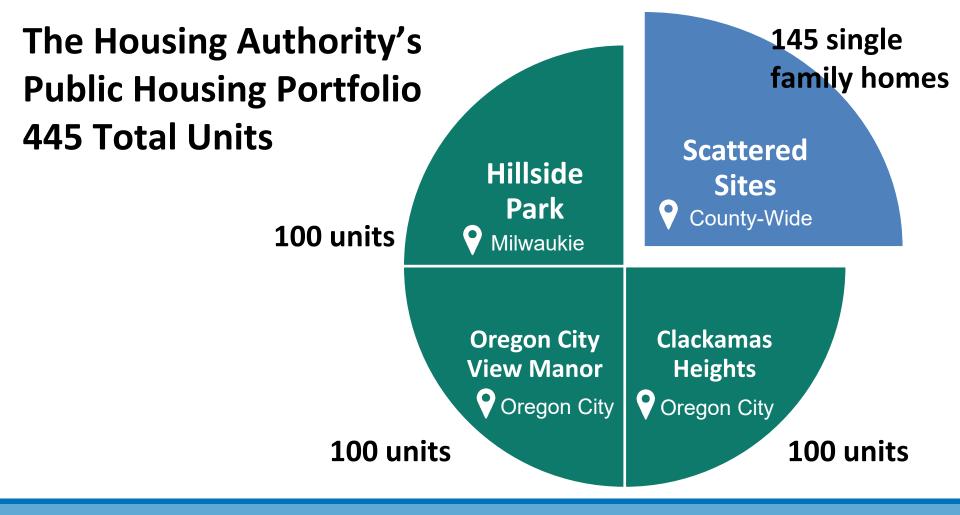
Percent change in funding since 2000, adjusted for inflation

## Federal Investment in Public Housing vs. Section 8 Rent Assistance Programs



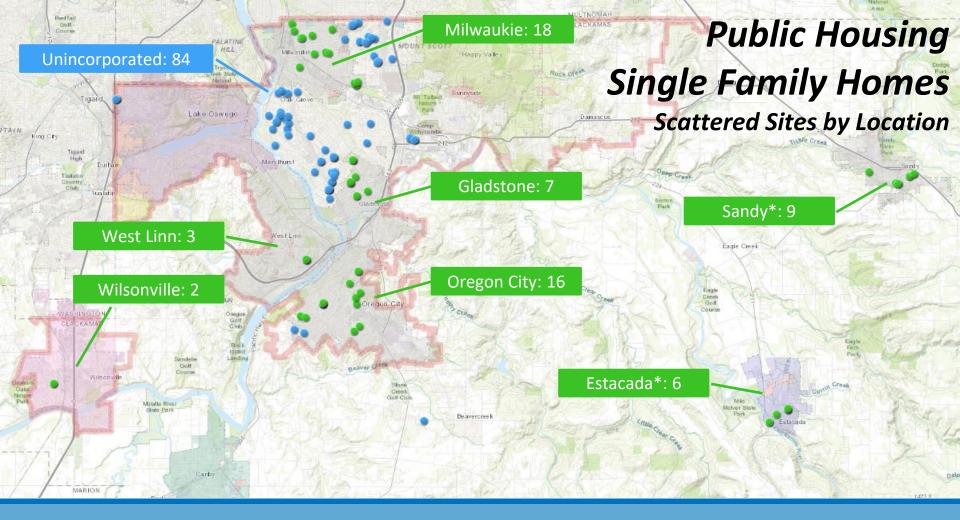
Note: "Public Housing" includes capital and operating funds. "Section 8 programs" includes outlays for the Housing Choice Voucher and Project-Based Rental Assistance programs. The graph reflects annual budget authority for public housing and (to avoid distortions from one-time recissions of funds and other factors) annual outlays for Section 8. Public housing funding for 2009 includes supplemental capital funds provided in economic recovery legislation.

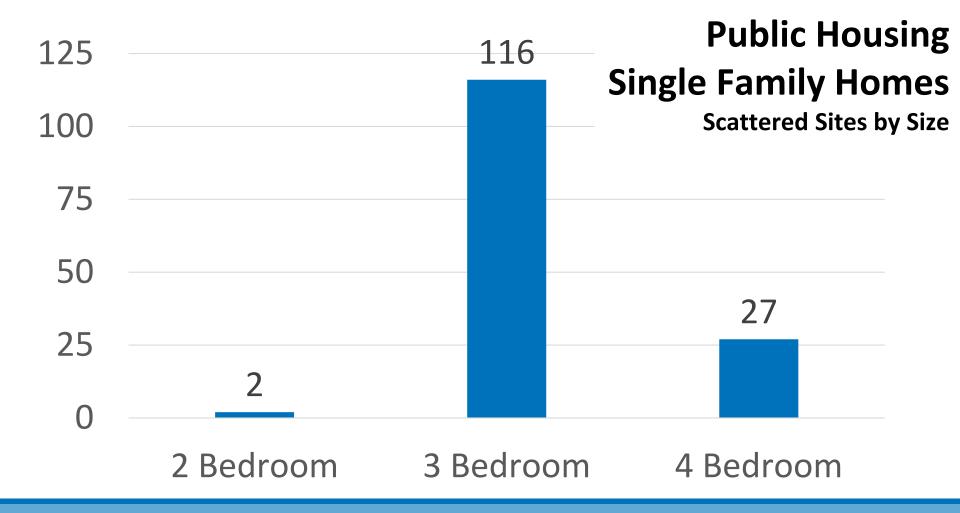
Source: Office of Management and Budget Public Use Database, Department of Treasury expenditure data, and annual appropriations legislation

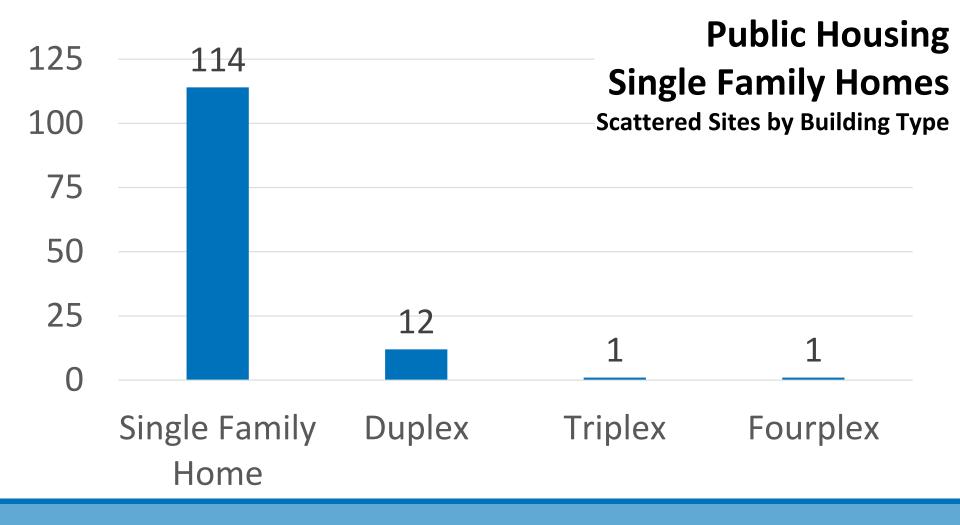


## Planned Outcomes for Clackamas County

PROPERTY	ACTION	EXISTING	NEW	VOUCHERS	AFFORDABILTY
		UNITS	UNITS	CREATED	PRESERVED
Hillside Park	Redevelopment	100	500	100	
Scattered Sites	Disposition	145	0	145	Up to 145
OCVM	Disposition	100	0	100	
Clackamas Heights	Redevelopment	100	250	100	
	445	750	445	Up to 145	







# **Scattered Site Repositioning**

### Goals

- ✓ Generate sale proceeds for new affordable housing development
- ✓ Preserve affordability through creative strategies

### **Strategies for disposition**

- ✓ First-time homebuyer programs in partnership with organizations like Proud Ground and Habitat for Humanity
- Recovery-oriented transitional housing in partnership with communitybased housing services providers (leveraging Supportive Housing Services funds)
- ✓ Private market sales

#### **Clackamas County Public Housing Repositioning FAQs**

#### What is happening with Clackamas County's Public Housing?

The Housing Authority of Clackamas County (HACC) is repositioning its 445 unit Public Housing portfolio. The portfolio consists of three 100-unit multi-family developments in Hillside Park, Clackamas Heights, and Oregon City View Manor (OCVM), and 145 scattered site single-family homes located throughout Clackamas County.

#### What is repositioning?

As federal funding to maintain public housing has decreased for decades, public housing agencies across the country, including HACC, are struggling to adequately maintain their aging housing stock. In 2018, recognizing the significant backlog of capital needs and solidifying its intent to remove itself from public housing administration, the U.S. Department of Housing & Urban Development (HUD) established a number of programs to allow public housing agencies flexibility to "reposition" their portfolios and "develop locally appropriate strategies to preserve affordable housing." Repositioning will allow Clackamas County to replace its aging Public Housing portfolio with new rent assistance vouchers and newly developed affordable housing. This will happen through a process of relocating existing residents using new rent assistance vouchers allocated by HUD as part of repositioning, disposing of and/or redeveloping existing property, and using asset sale proceeds to develop new affordable housing.

#### How will existing residents be affected?

As part of the repositioning process, each displaced household will receive a Section 8 Tenant Protection Voucher and relocation assistance. These vouchers provide more flexibility for residents than public housing assistance, which is tied to the property. Tenant-based Section 8 voucher holders can take their voucher and lease safe, decent, and affordable privately owned rental housing in a location of their choice. Residents will also be provided the right to return to a newly constructed home once the redevelopment is complete. If they choose to return to the new property, their moving costs will be covered by HACC.

#### Are the residents aware of these changes?

Yes, HACC has been proactively hosting a series of meetings to provide information and give residents the opportunity to ask questions. These meetings will be ongoing and scheduled as new information is available and at critical phases for each project. In addition, HACC will also be hosting engagement meetings related to the redevelopment of Clackamas Heights to encourage an open dialogue between the design team and residents. These meetings will include the review of design options and amenities, allowing for resident input and feedback.

#### Why is this happening now?

Clackamas County has the oldest public housing in Oregon and among the oldest in the country. In recent decades, the federal government has increasingly reduced budgets for public housing repairs and operations. In place of investing in public housing, the federal government has increased its investment in affordable housing programs that rely on the private sector, such as rental assistance vouchers and tax credits.

The passing of the 2018 Metro Affordable Housing Bond and the 2020 Supportive Housing Services (SHS) Measure provides HACC with a unique opportunity to utilize its existing public housing assets to leverage public and private resources to increase affordable housing opportunities in Clackamas County. As outlined in Clackamas County's Metro Affordable Housing Bond Local Implementation Strategy (LIS), HACC set aside nearly half of its bond revenue to leverage opportunities related to repositioning. Clackamas County has allocated SHS funding for this as well. This provides a once in a generation opportunity for the Housing Authority to improve its existing assets, build more affordable housing, and create a sustainable platform for the Housing Authority that is responsive to the realities of funding opportunities and congressional appropriations.

#### Where are we in the process?

Each of the assets in the portfolio are at different phases of the repositioning process.

- Hillside Park The existing 100 units at Hillside Park in Milwaukie are being redeveloped with up to 500 new units in two phases. The Section 18 application for Phase 1 has been approved by HUD and redevelopment activities are underway. 54 existing units will be demolished and 275 new units will be constructed. Construction on Phase 1 will start this summer. Planning for Phase 2 with redevelopment under Section 18 is underway. HUD has already approved Section 18 justification. In Phase 2, 46 existing units will be demolished and up to 225 new units will be constructed. Existing residents in Phases 1 and 2 are being relocated with Section 8 rental assistance and they will be given the option to relocate into a newly constructed unit once complete. Construction on Phase 2 is expected to start in 2026.
- **Clackamas Heights** The existing 100 units at Clackamas Heights in Oregon City will be redeveloped with up to 250 new units. Community engagement is underway and the site concept plan is in development. Staff will be working to secure support from the local jurisdictions and prepare the Section 18 application to submit to HUD.
- Oregon City View Manor The existing 100 units at Oregon City View Manor are planned for disposition, with the asset sale proceeds going towards the Clackamas Heights redevelopment and/or other projects. Staff are preparing the Section 18 application to submit to HUD. Staff will be working to secure support from the local jurisdiction and are preparing the Section 18 application to submit to HUD.
- Scattered Sites The 145 scattered site single-family homes located throughout Clackamas County are planned for disposition, with each home being sold under one of three scenarios: 1) affordable home ownership opportunities for existing residents through a land trust model; 2) to the private market; or 3) to community based organizations to deliver recovery oriented services. Asset sale proceeds will go towards the Clackamas Heights redevelopment and/or other projects. Staff will be working to secure support from the local jurisdictions and preparing the Section 18 application to submit to HUD.

#### Will residents be cost-burdened by this?

No. While moving is inconvenient, all moving expenses will be covered by HACC, including:

- **Relocation Advisory Services**: counseling, multiple one-on-one consultations, and assistance locating available units.
- Moving Expenses: travel reimbursement, boxes, packing paper, and movers.
- Moving fees and deposits
- Right to Return: moving fees covered

#### Will affordable housing units be lost or gained?

Because of these repositioning efforts, the amount of affordable housing will increase in Clackamas County.

PROPERTY	ACTION	HUD	EXISTING	NEW	VOUCHERS	AFFORDABILTY
		METHOD	UNITS	UNITS	CREATED	PRESERVED
Hillside Park	Redevelopment	Section 18	100	500	100	
Scattered Sites	Disposition	Section 18	145	0	145	Up to 145
OCVM	Disposition	Section 18	100	0	100	
Clackamas Heights	Redevelopment	Section 18	100	250	100	
TOTAL			445	750	445	Up to 145

Current total Public Housing: 445 units

Planned Repositioning Outcomes:

- Section 8 Vouchers: 445 new vouchers
- Hillside Park Redevelopment: up to 500 new affordable units (replacing 100 public housing units)
- **Park Place Redevelopment:** up to 250 new affordable units (replacing 100 public housing units)
- Affordable Scattered Site Housing Opportunities: up to 145 (includes homeownership & supportive housing opportunities)
- **Oregon City View Manor disposition:** affordable homeownership opportunities through partnership with homeownership organizations like Habitat for Humanity

In addition, all sale proceeds HACC receives because of these repositioning processes will be restricted by HUD to support affordable housing. HACC plans to use these proceeds to support additional affordable housing development throughout Clackamas County.



March 7, 2024

Kris Strickler Oregon Department of Transportation Via email CC: Brendan Finn, ODOT; Mandy Putney, ODOT; Keith Lynch, FHWA

Dear Mr. Strickler,

We are aware that Oregon Department of Transportation (ODOT) is planning a 30 day public comment period for the I-205 Toll Project Supplemental Environmental Assessment (EA), anticipated to begin in July of 2024. That timeline is insufficient, and as members of the Clackamas County Coordinating Committee (C4) we request that the comment period be extended to allow a total of 60 days.

Staff from our various agencies have reached out to ODOT earlier to request an extension to the comment period. However, C4 has been informed that ODOT denied the extension request, citing federal regulations that require a 30-day minimum comment period. For a project that has fallen under scrutiny for lacking sufficient public engagement, we are surprised ODOT is choosing to adhere to the federal bare minimum. Even the initial EA for the I-205 Toll Project included a 45-day comment period. We submit that Oregon can do better than a federal minimum, especially for a project as significant as this.

The foundations for our request to extend the comment period to 60 days are outlined below. These should not be misconstrued as political frustrations, but rather as reasonable, technical concerns to how traffic moves through constrained corridors, affects traffic patterns and creates – rather than solves – burdensome infrastructure problems, all while increasing costs for Oregonians that depend on an efficient and safe transportation system.

First, we are requesting an extension due to a matter of process. The Supplemental Environmental Assessment will include thousands of pages of information that will need to be reviewed and analyzed before comments can be developed. Comments will then need to be presented, discussed and coordinated through our individual jurisdictions and our C4 coordinating committee. A 30-day comment period is incredibly constraining, given the procedural and public notice requirements of each C4 governing body, as well as the staff time it takes to review and seeking approval for a letter of comment. Moreover, some cities meet only once per month. So depending on the time of the EA release, there could be jurisdictions and elected boards that miss a chance to formally respond on behalf of their communities due to public meeting laws.

Second, ODOT has not directly responded to any of the specific comments submitted as part of the initial Environmental Assessment process from 2023. ODOT has also failed to offer many opportunities for staff agency coordination for the 2024 release, which we have been told will have a reduced scope. Simply reviewing the new materials to compare against previous materials to ensure we understand the changes will require meaningful staff attention and evaluation. Had ODOT responded more specifically to the questions and concerns from the 2023 EA, this step might have been mitigated.

Third, our technical staff will be evaluating this material from scratch. Staff have so far received little of the technical information they requested from ODOT regarding the Supplemental EA, and there is little to no indication that sufficient information will be shared in advance for early review.

Fourth, we are also concerned about the lack of opportunities for public engagement. How will ODOT provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback within a 30 day comment period? More time and more opportunities are needed to review the EA, and this extension will allow adequate time for public engagement. This request to extend the Supplemental EA comment period is a chance to prove that ODOT is willing to hear the concerns of local communities and create realistic – rather than perfunctory – opportunities to participate in process that will affect the residents, visitors, and businesses of our communities

ODOT is proposing a major change to how our transportation system (both on and off the highway) will function, as evidenced by the extensive analysis presented in the initial EA. The Governor's Office has already paused the collection of tolls because of the insufficient process and poor engagement with local governments, and most importantly to make sure there is sufficient time to do good work by all impacted agencies and jurisdictions. Therefore, C4 formally requests an additional 30 days be added to the public comment period for the I-205 Toll Project Supplemental Environmental Assessment, which will result in a 60 day public comment period.

We request a response to this 60 day proposal by the end of March 2024.

Thank you for your consideration.

Sincerely,

Clackamas County Coordinating Committee (C4)

CC: Clackamas Caucus Joint Committee on Transportation Special Subcommittee on Transportation Planning