

Gresham 2021-25 Consolidated Plan Draft- 5/3/2021

Executive Summary

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

1. Introduction

The Consolidated Plan is a required document that all jurisdictions receiving federal funding from the U.S. Department of Housing and Urban Development (HUD) must submit every five years to receive funding. The five-year plan provides an assessment of community needs and a market analysis and engages the public to establish goals, prioritize needs and identify strategies to address community needs. This document is the Consolidated Plan for Gresham as a member of the Portland Consortium for the five-year period covering 2021-25. This Plan also includes the fiscal year 2021-22 Annual Action Plan. The Annual Action Plans outline on how the jurisdictions intend to allocate the funding that is received and identifies projects to address the needs identified in the Consolidated Plan.

The Portland Consortium that consists of the City of Portland (Lead), City of Gresham and Multnomah County (representing the unincorporated portions and smaller cities within its boundaries).

- CDBG Program Objectives: Provide decent housing; Create suitable living environments; Expand economic opportunity
- HOME Program Objectives; Expand the supply of decent, safe, sanitary and affordable housing.
- ESG Program Objective: Reduce and prevent homelessness.
- HOPWA Program Objective: Provide housing for persons with HIV/AIDS.

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

As determined in the Needs Assessment and Market Analysis included in this plan, three broad needs and goals were identified described below:

Affordable housing choice (Need); Increase and preserve affordable housing choice of rental and homeownership units for low- and moderate-income households in ways that promote racial equity. (Goal)

The 5-year objective for the Consortium is to assist over XXXXX households access affordable housing choice including safe housing, in good condition for all residents. Projects accomplishing this goal include home repair, down payment assistance, new housing development support, affordable housing development, rental housing rehabilitation and permanent supportive housing.

Gresham specific 5-year Goals include: Rental units rehabilitated- 50 housing units; Homeowner Housing rehabilitation- 130 housing units; Direct Financial Assistance to Homebuyers- 35 households; Public Services activities other than low-mod housing- 125

Basic services & homeless prevention/intervention (Need); Reduce and prevent homelessness, including mitigating the overrepresentation of Black, Indigenous, and People of Color experiencing housing instability. (Goal)

The 5-year Consortium goal includes preventing and reducing homelessness for over XXXXX residents. Projects accomplishing this goal include culturally relevant services and interventions across a broad spectrum, such as supportive and emergency services, rent assistance, transitional housing, shelters, homelessness prevention through service interventions, Housing First models, and Fair Housing enforcement and education.

Gresham specific 5-year Goals include Public Services activities other than low-mod housing- 400; TBRA/Rapid rehousing- 200

Community and economic development (Need); Improve livability and promote economic development in low and moderate-income areas by investing in community infrastructure, employment training and anti-poverty strategies for area residents. (Goal)

This goal includes improving infrastructure, facilities, economic opportunities and economic development. 5-year Consortium goals include creating XXXXX jobs, assisting XXXX business and servicing over XXXXX residents with infrastructure improvements. Programs to improve employment outcomes and household economic stability include employment training, referral and self-sufficiency and economic enhancement programs. Projects accomplishing this goal include extensive work with infrastructure, which is seen in Portland, Gresham and Multnomah County as essential in encouraging stability in neighborhoods, increasing access to persons with disabilities and attracting and retaining businesses. Projects will also support micro-enterprises and business development, as well as public facilities, parks and transportation improvements.

Gresham specific 5-year goals include Public facilities or infrastructure other than low mod housing- 15,000; Public Services activities other than low-mod housing- 1875; Business assistance- 100

3. Evaluation of past performance

The City of Portland, the City of Gresham and Multnomah County have made significant progress over the years in meeting needs. The organizational structure includes coordination between departments within the Consortium jurisdictions as well as coordination with agencies outside the Consortium, including Metro and Home Forward. The Consortium planning efforts create efficiencies in performance and delivery in spite of dwindling resources. Collaborative county-wide planning efforts include targeting the need for housing, building a suitable living environment through services and infrastructure, and

fostering a system and improvements to spur economic development. In addition to a regional approach to projects and programs, area residents have supported increasing local resources to address the affordable housing crisis in the form of housing bond measures, general funds, and fees. Additionally, Portland, Gresham and Multnomah County have strong regional planning efforts, including the Continuum of Care and a Home for Everyone that focus on alleviating the sufferings faced by population experiencing homelessness. This combination of collaboration and local resources have helped the Consortium to actively address the affordable housing and economic prosperity needs of the community.

Given the performance period includes the year 2020, it is important to note the impact that the COVID Pandemic has had on the jurisdictions. Since March 2020, the Consortium has continued to fund projects and address the most immediate needs of the area residents in ways that can ensure safe but effective and efficient provision of services. The Consortium has moved efficiently and effectively to scale up necessary assistance for population experiencing homelessness, deploy Tenant Based Rent Assistance (TBRA) for households facing risk of eviction and has worked hard to support area micro enterprises and small businesses to adapt to ever changing business delivery model and help them stay afloat. The Consortium is absolutely committed to addressing the emerging and existing needs of the no and low-income residents of the community. Additionally, the Consortium is very committed to furthering racial equity for the Black, Indigenous and People of Color (BIPOC) residents of the community.

4. Summary of citizen participation process and consultation process

This Consolidated Plan was prepared in the midst of the COVID-19 pandemic, therefore the consortium has had to rely on virtual hearings, online surveys and remote consultations to solicit public comments and gather community input. Citizen Participation was conducted through two remote Community Need Hearings, surveys and comment cards, consultations with citizen subcommittees and local service providers and local Action Plan and budget hearings.

To ensure broader outreach to residents, the comment card was translated into four different safe harbor languages: Spanish, Simplified Chinese, Russian and Vietnamese based on the Consortium language access guidance.

The Consortium has also relied on input from multiple task forces convened to address the needs created by the public health emergencies and a tailored consultation survey for local service providers.

5. Summary of public comments

Public comments were offered through public hearings, written submissions and remote consultations with citizen committees and service providers.

Public comments highlighted the need for various services and infrastructure improvements across the county and called out the heightened need for assistance programs due to the COVID-19 pandemic. Housing needs were identified as a primary area of concern and participants noted the need for rent assistance programs, credit recovery assistance to help eliminate barriers to housing and additional housing development throughout the region. Parks and community green space were also a priority need called out by community members. Many renters have limited access to green space and adequate, well-maintained community parks are needed so that families have safe outdoor recreation spaces. The lack of living wage jobs was highlighted as one of the root causes of housing insecurity and the need for other services. Economic development programs to provide job training and placement, create jobs and encourage growth for local small businesses were identified as a high need. Community members also noted that public services including childcare assistance, youth mentoring and other services, literacy and technology education opportunities, and food assistance programs are a high need, especially culturally specific services. Many households for whom English is not their primary language lack equitable access to services and programs that currently exist due to language barriers. Other infrastructure improvements such as sidewalks, flashing beacon crosswalks, and lighting were called out as an ongoing need.

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

All comments were considered and/or incorporated in the Consolidated Plan.

7. Summary

The Process

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	GRESHAM	
CDBG Administrator	GRESHAM	Community Revitalization

Table 1– Responsible Agencies

Narrative

The City of Portland is the lead agency in the HOME Consortium. The Portland Housing Bureau (PHB) administers the HOME funds and as such is designated as the lead agency for the Plan. Staff for the HOME Consortium meets periodically for coordination of planning. Staff seeks guidance from their respective housing investment committees.

Consolidated Plan Public Contact Information

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

1. Introduction

This section under Portland's plan outlines consultations with public and private agencies that provide housing, social and economic development services through State and local health and child welfare agencies, adjacent governments, HOPWA grantees, the public housing agency, Continuum of Care grantees, Emergency Solution Grant grantees, and public and private agencies concerning housing, and related social programs for homeless, victims of violence, unemployed and publicly funded institutions and systems of care that may discharge persons into homelessness, such as health-care facilities, mental health facilities, foster care, and corrections programs. The Portland Consortium includes representatives from the City of Portland, the City of Gresham and Multnomah County. They participate in regional planning efforts concerning all aspect of needs and opportunities covered by this Consolidated Plan, including economic development, transportation, public services, special needs, homelessness, and housing. Needs far exceed resources so the Consortium members have worked together to make decisions and set long-term priorities. Coordination within the Cities also consisted of input and review from the Portland Housing Advisory Commission, the Fair Housing Advocacy Committee, the Federal Funding Oversight Committee, the City of Gresham Community Development and Housing Subcommittee and the Multnomah County Policy Advisory Board. Coordination with Home Forward and Housing, service-providing agencies, and other stakeholders are described below. Their comments and input are reflected in discussions throughout this Consolidated Plan.

The list of agencies, groups and organizations consulted is outlined in detail in the Consortium lead plan and not duplicated in the table in Gresham's plan. The City of Gresham was an active member in all consultation. A few agencies and organizations having a particular bearing on statements of needs and priorities for Gresham are listed in the table in this section. For the complete list of consultations, please refer to the plan for the lead entity (City of Portland).

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

Representatives of the Consortium of the City of Portland, City of Gresham and Multnomah County participate in regional planning efforts concerning all aspects of needs and opportunities covered by this Consolidated Plan, including housing, public services, homelessness, special needs, economic development and transportation. Significant resources are jointly planned and administered for homelessness prevention, emergency housing and supportive services. Coordination efforts and planning processes are reflected in discussions throughout this Consolidated Plan. In preparing the Consolidated Plan, the Consortium has consulted with other public and private agencies that provide assisted housing, health services and social services (including those focusing on services to children,

elderly persons, persons with disabilities, persons with HIV/AIDS and their families and homeless persons).

These consultations have occurred in the course of regularly-occurring meetings of the Portland Housing Advisory Commission, A Home for Everyone coordinating board, the Fair Housing Advocacy Committee, Healthy Homes Coalition, Oregon Opportunity Network in special meetings and hearings sponsored by the City of Portland, the City of Gresham and Multnomah County and in specially noticed Consolidated Plan hearings. Consultation occurred with both housing and service providers; Home Forward (formerly Housing Authority of Portland); homeless persons; people with disabilities; and organizations that provide services to homeless families, people with alcohol or drug addictions, people with developmental disabilities, HIV affected families, the elderly, homeless adults, children and families and people with mental illness.

The Consortium consulted with state and local health agencies regarding lead paint issues. Child welfare agencies do not have a role in lead hazard identification or abatement in Multnomah County. For this plan the Consortium met specifically, or within the course of everyday business, with each of the required public and private agencies.

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

All three of our Consolidated Plan jurisdictions (Portland, Multnomah County, and Gresham) are represented on the Continuum of Care (CoC) Board, which meets monthly, and its Executive Committee, which meets quarterly. The CoC coordinates with the jurisdictions through meetings, calls and emails to organize needs and Action Plan hearings to work on strategic planning, outreach, evaluation and system coordination. All of the jurisdictions support the Continuum’s priorities focusing on the needs of the most vulnerable populations including chronically homeless persons, unaccompanied youth, families with children, and veterans, among others. The CoC is part of a coordinated effort called “A Home for Everyone.” The A Home for Everyone Plan calls for assessment and rapid placement in appropriate housing, reducing vulnerability and increasing stability. CoC goals from Consortium local homelessness plan align with our Consolidated Plan. Under the 2021-2025 Consolidated Plan, this primarily comes through coordination between the CoC needs assessments and strategic plan and the Consolidated Plan priority need #2 (Need for basic services and homelessness prevention and intervention) and goal #2 (Reduce homelessness and increase stability), though each of the Consolidated Plan priority needs and goals also aligns with CoC effort, especially those related to affordable housing production and preservation and economic opportunity. The CoC works with all three jurisdictions to engage consumers, neighborhoods and public agencies providing housing, health and social services, including health care agencies and the public housing authority. The CoC specifically looks at the needs of homeless persons, particularly chronically homeless individuals and families, families with children,

veterans, and unaccompanied youth, and persons at risk of homelessness. The CoC is working on a single point of entry system, it has been successful at addressing veteran homelessness, and the CoC is using its experience to address other special need homeless populations.

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

The Portland Consortium work closely with the Collaborative Applicant of the Continuum of Care (planning for allocation and use of Emergency Solutions Grant (ESG) funds). ESG policies and procedures were created and are updated periodically in cooperation with the Consortium. Guidelines ensure that ESG subrecipients are operating programs consistently across eligible activities. Performance is reviewed by all three entities. The Collaborative Applicant (City of Portland) is also the HMIS lead and works closely with Multnomah County to maximize use of HMIS resources and to draw data for reports on project performance and program outcomes.

The CoC actively solicits and integrates ESG recipient participation in planning, evaluation & reporting. The Portland Housing Bureau (PHB) staffs the CoC Board and is also an ESG grantee and lead agency for the CoC and Portland Consolidated Plan. The CoC gathers input from ESG recipients through subcommittees, including the data & evaluation subcommittee, to assess needs and guide ESG funding decisions to more effectively end homelessness. Our CoC currently directs ESG to expand capacity of the regional Short Term Rent Assistance program and operate emergency shelter closely aligned with locally- and CoC-funded housing resources. PHB monitors ESG recipients and evaluates project performance using CoC-developed housing placement outcomes collected in the regional homeless management information system (HMIS). Data is analyzed from project-level outcomes, system-wide point-in-time counts of homelessness and HMIS reports and ESG recipient feedback, and ESG-specific policies and procedures are included in the CoC's adopted HMIS policies and procedures. The CoC's data and evaluation subcommittee evaluates outcomes to provide direction for project- and system-level performance improvements.

The responsibility for implementing the Plan will rest with the Portland Housing Bureau, Gresham's Community Development Department, Multnomah County Department of Human Services and Home Forward. However, implementation cannot proceed without the involvement and support of several public and private agencies. The following list describes the various institutions, businesses and agencies responsible for the delivery of housing and economic opportunity services in the region. Each description of a product and market segment is not intended to be a complete account of activities for each entity.

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

Table 2– Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Gresham
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Interviews were held with department representatives including public services, homelessness, economic development, planning, parks/recreation, transportation and other infrastructure need.
2	Agency/Group/Organization	HUMAN SOLUTIONS INC
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing

What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Economic Development Market Analysis
How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Individual consultation with agency representatives

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

No agencies were intentionally excluded from consultation. Every effort was made to ensure advance publication of meetings and opportunities to contribute.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3– Other local / regional / federal planning efforts

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

Home Forward, the housing authority for the cities of Multnomah County, was specifically consulted for the sections of the Consolidated Plan relevant to their portfolio. The state is consulted for all notices of funding. The County is specifically consulted in planning for housing supportive services, referral and other housing stabilization initiatives. The Consortium members are all active members of the Continuum of

Care, A Home for Everyone and other committees that influence homelessness prevention and homeless services. The Consortium also works in consultation with the community development and infrastructure organizations such as the Portland Development Commission, Metro, Tri-Met, Oregon Department of Transportation and equivalent municipal agencies and other public entities and associations that set priorities for the use of resources in the region, set goals and measure progress in meeting those goals.

Narrative

A number of plans and reports were consulted in preparation of this Consolidated Plan, reflecting policies, needs or significant research. Those include:

- City of Gresham Comprehensive Plan
- Gresham Community Development Plan
- City of Gresham Parks & Recreation, Trails and Natural Areas Master Plan
- Gresham Neighborhood Change Analysis
- Multnomah County Comprehensive Gang Assessment
- Multnomah County Strategic Plan to Address Gang Violence
- City of Gresham Capital Improvement Program
- Gresham Powell-Division Transit and Development Project Action Plan
- Gresham Active Transportation Plan
- Multnomah County Department of County Human Services, 2012 Annual Report
- Poverty in Multnomah County (2019)
- Map Gresham: Opportunity Analysis
- City of Gresham Housing Study
- Gresham 2020 & 2021 Council Work Plans
- Gresham Task Force on Housing Final Report
- Gresham Housing Capacity Analysis for 2021-41
- Multnomah county Local Implementation Plan for the Metro Supportive Housing Services Measure
- Portland Business Alliance 2018 Economic Check-Up- East Multnomah County

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

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

The consultation process for this Consolidated Plan was extensive, giving citizens and service providers many opportunities to contribute. Citizen Participation was conducted through two Community Need Hearings, surveys and comment cards, consultations with citizen subcommittees and local service providers and local Action Plan and budget hearings. Due to the pandemic, in-person hearings and events and door to door surveys could not be conducted, but remote hearings and online surveys were provided to gather valuable community input. Citizen comment cards were translated into four languages in an effort to broaden citizen participation.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
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1	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>November 17, 2020 Community Needs Hearing: 17 people at the Multnomah County and City of Gresham need hearing.</p>	<p>Comments highlighted the need for public services, especially those that alleviate heightened needs caused by the pandemic, including services that cover households' basic needs such as housing costs, utilities, food and childcare. Participants also noted the need for more housing and more affordable housing, job training and other economic development opportunities and infrastructure improvements including parks, sidewalks, lighting and crosswalks.</p>	<p>All comments accepted.</p>	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
2	Public Hearing	Non-targeted/broad community	May 3, 2020 Community Development & Housing Subcommittee Public Hearing for the 2021-25 Con Plan and the 2021-22 Annual Action Plan:		Not applicable	
3	Public Meeting	Non-targeted/broad community	June 1, 2021 Gresham City Council Meeting:			

Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The need for programs that assist low-and moderate-income residents in Gresham, and countywide, are significant and have been heightened by the impacts of the Coronavirus pandemic. Throughout Multnomah County housing costs continue to rise faster and more steeply than household income. In Gresham, residents expressed the need for higher wage job opportunities in the City, as many residents must travel outside Gresham for work due to a lack of living wage jobs in Gresham. Stakeholder input throughout our community engagement processes has highlighted the need for a balance between affordable housing, living wage jobs and community amenities such as parks, transportation, shopping, recreation, education and services to create vibrant and sustainable communities.

There is a need for housing that is affordable, in good condition, and located in safe neighborhoods with convenient access to necessary services and resources. Gentrification and rising housing costs in Portland have continued to push low-income, marginalized groups out into East Multnomah County and Gresham due to the historically lower housing costs relative to Portland. This has increased the demand for affordable housing and raised housing costs in Gresham, putting low-income and marginalized residents at higher risk of displacement or houselessness, and has increased the need for accessible, culturally specific services to address the needs of these residents. According to Gresham's Housing Capacity Analysis for 2021-2041, the median housing prices have increased from approximately \$259,000 in 2015 to \$401,000 in 2020, a 55% increase, and rates of housing cost burden increased from 34% in 2000 to 44% in 2014-2018, with 21% of households being severely cost burdened. Households that are overburdened with housing costs are at higher risk of houselessness, are more likely to be forced to choose between paying for housing or other necessities such as food or medical care and are more likely to live in overcrowded conditions and substandard housing. The COVID-19 pandemic has likely increased the vulnerability for many low-income households, as many have lost jobs due to statewide shutdowns and decreased tourism. While there is currently a moratorium on evictions and foreclosures for tenants and homeowners unable to pay their housing costs due to the pandemic, the Consortium anticipates a higher risk of houselessness for these residents when the moratoriums end because households will still need to repay previously due rent and mortgage payments.

There is a need for increased services to prevent and relieve houselessness and to assist individuals to become self-sufficient and this need has increased due to the pandemic. Gresham has high concentrations of vulnerable populations in need of assistance and a higher concentration of poverty than Portland or the county as a whole. The ACS 2019 5-Year Estimate indicates that Gresham has a 16.5% poverty rate, compared to 13.8% countywide and 13.7% in Portland. The City believes this estimate is low, as other data sources, including previous years' ACS data, indicate that Gresham's poverty level is closer to 20%. In Gresham 19.7% of households are single parents living with their

children and no spouse and nearly three-quarters of those are female head of household. Over one-quarter (25.5%) of Gresham youth under the age of 18 live below the poverty level. On average, women in Gresham earn 25% less than men and the median earnings for Gresham residents overall was \$35,644, so single parent households, especially those with a female parent, are more vulnerable and more likely to live in poverty.

Culturally specific programs are a growing need in Gresham as the City's diversity continues to increase with the influx of displaced households from Portland moving East. People of color are overrepresented in the City's poverty levels, making culturally relevant services and services that provide equitable access to diverse groups a necessity. For example, while Latinx and Hispanic individuals make up only 21.5% of Gresham's population, 41.5% of residents living in poverty identify as Latinx or Hispanic.

Economic development projects to help add jobs in the community, increase residents' earning potential and stimulate small business growth are critical needs to help pull Gresham residents out of poverty. Residents have expressed a need for more living wage jobs in Gresham, and job training and placement programs, including programs that assist youth in bridging the gap between high school and living wage employment. There is also a heightened need for emergency and sustained services, especially programs that meet immediate needs. With the COVID-19 pandemic shutting down or restricting many businesses in March 2020, many low-income residents and small business owners lost or saw a great reduction in their incomes. Additionally, the lack of accessibility to other services such as quality, affordable childcare, youth services, and transportation are ongoing challenges exacerbated by the pandemic.

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The City of Gresham has extensive unmet needs for public facilities. There are currently no community centers in Gresham and there is only a small senior center and limited public recreation facilities. Through the community outreach conducted for this plan, along with ongoing community outreach conducted by the City and Multnomah County, there is clearly a need for community gathering places, public green spaces, and safe recreation options for youth.

The 2020 Council/Gresham Redevelopment Commission (GRDC) Work Plan outlines major projects that the GRDC hopes to undertake in the Rockwood-West Gresham Urban Renewal Area. The redevelopment of the former Fred Meyer site into Downtown Rockwood, a community hub that focuses on economic revitalization and community development in the City's low-income Rockwood neighborhood, has broken ground and completed the Innovation Hub, which is the first of three buildings planned for the site. The Innovation Hub, which will house tenants including the Mt. Hood Small Business Development Center, Little Wings Academy, and WorkSource Portland Metro, was completed in October 2020 and will open to the public in 2021. These tenants will bring much needed services to assist Rockwood residents with job training, business development and childcare needs. The site will also house a market hall for groceries and local food vendors, mixed income apartments and a community plaza.

A bond passed by voters in November 2020 will fund expansions and renovations for Multnomah County libraries, including a new East County Flagship Library, which will be a valuable resource for Gresham and East Multnomah County residents. Projects will begin in 2021 and are scheduled to be completed by 2025. Community outreach efforts regarding the East County Flagship Library are scheduled to begin mid-year in 2022.

Gresham's Council Work Plan 2021 identifies parks and recreational opportunities for all residents as a key priority. In 2020, community feedback was solicited as part of an undeveloped parks concept planning study and a Council Listening Session. Community feedback highlighted the need for parks to be available to underserved communities for a variety of uses. In 2021, City Council will form a Parks Community Advisory Group to explore revenue options to fund park expansions, improvements and maintenance.

How were these needs determined?

Describe the jurisdiction's need for Public Improvements:

The Transportation System Plan is a blueprint for biking, walking, driving and transit through 2035. Goals are for healthy and active transportation options; safe and efficient system; economic development; well-connected, multi-modal system; and increased environmental stewardship. The City's Capital Improvement Program (2020-2025) identifies \$68 million in transportation projects, including street improvements, signage and streetlights, to improve mobility and/or enhance neighborhood livability. \$10 million has been included in projects related to footpaths and bikeways; identified projects include ADA curb ramps and other enhancements to improve accessibility. Projects related to parks, trails, and open space totaling \$9.8 million have been identified in the near term (through 2025)

The City completed its first Active Transportation Plan in 2018 that focused on walking and biking systems. Funded by the Racial and Ethnic Approaches to Community Health (REACH) program at Multnomah County, the plan used an equity centered approach to conduct community outreach and prioritize projects. Stakeholders reported needs for pedestrian improvements throughout Gresham including sidewalks, curb ramps, mid-block crossings, street lighting and other amenities. The Active Transportation Plan created a system of neighborhood bike routes that connect to everyday destinations like food stores, health clinics, schools and parks; and created a list of priority projects for sidewalk infill and street crossings. All needed improvements require considerable funding commitments.

According to the 2015 *Gresham Neighborhood Change Analysis*, development of the regional bus rapid transit (BRT) along Powell and Division Streets would bring rapid and reliable bus transit to the Division Street Corridor in Gresham and to the employment campuses in northeast Gresham, including Mt. Hood Community College. Construction of the BRT is currently underway and the line began serving select stations on April 4, 2021. The BRT will further enhance alternatives to cars in Gresham and regionally. The route in Gresham will focus on Division, connecting to Downtown Gresham and then to Mt. Hood Community College using Stark Street. This will stimulate more commercial development in Downtown and the Civic Neighborhood, bringing site improvements, along with housing and other amenities. Public engagement conducted as part of the process indicated preference for sidewalks, safe and attractive stations, bicycle lanes; community gathering places; access to parks and shopping; support for jobs and housing available at a range of costs.

Stakeholders at Community Needs Hearings reported a need for pedestrian improvements throughout Gresham including sidewalks, curb cuts, flashing beacon crossings, street lighting and other amenities.

How were these needs determined?

Describe the jurisdiction's need for Public Services:

Demand for public services countywide exceeds system capacity to provide these services. According to the *2019 Poverty in Multnomah County* report 34% of Multnomah County residents are unable to meet their basic needs without the public safety net services. The report also emphasizes that while Multnomah County has experienced strong economic growth over the past decade, this growth was driven by the incomes of the highest earning households, while wages have remained stagnant for other workers and employment alone is not enough to pull a household out of poverty and identifies Outer East Portland and Gresham/East County as the areas with the highest concentrations of poverty.

There is a need for mobile outreach services to assist houseless residents and those who do not have access to reliable transportation. It is difficult to control crime, drugs and sanitary conditions in houseless encampments. While the number of shelter beds in Multnomah County has increased in recent years and with the pandemic, they may not be easily accessible to houseless individuals in Gresham. Gresham's Homeless Services department has two staff members in the community, connecting with houseless residents and connecting them with services, supplies and housing opportunities.

In May 2020, Metro voters passed ballot measure 26-210 known as the Supportive Housing Services Measure. The measure is projected to generate as much as \$248 million a year across the region, once fully implemented. Of that, approximately \$100 million a year is ultimately expected to come to Multnomah County. Governments across the Metro region will be able to grow and sustain the critical interventions that actually end homelessness, including rent assistance and other support services vital to helping keep people housed. Gresham will monitor the implementation of this new funding and anticipates there will be additional needs for public services. The 2014 report *Multnomah County Comprehensive Gang Assessment* found that while overall crime in Multnomah County has decreased in recent years there has been a shift in crime to southeast and east Portland and to Gresham. There is a need for safe and productive options for youth, for education, and for employment training and placement. Gresham supports gang prevention and intervention by funding recreational programs in the park, mentoring programs evening basketball. The County created a Strategic Plan to Address Gang Violence, which identifies community goals and objectives for gang prevention and intervention, in response to the 2014 assessment. Key themes included the need for mentors, connections to schools, employment opportunities for youth and partnership with parents. Multnomah County has seen a dramatic increase in gun violence during the Pandemic. Regional leaders are looking at effective measures to reduce gun violence.

Victims of domestic violence, especially those with children, are extremely vulnerable to becoming homeless. In the *14th Annual Domestic Violence Counts Report*, the National Network to End Domestic Violence reported on surveys of providers throughout the United States. In Oregon, 31 programs participated in the survey on September 12, 2019 and reported 1,032 adult and child victims served in one day. They report cites 183 unmet requests for services that day including housing, emergency shelter, transportation, legal assistance and childcare. Public services programs are critical for providing shelter and wrap around services to support and stabilize victims of domestic violence.

Currently, 13.4% of the population in Gresham is 65 or older and 8.3% of Gresham seniors live in poverty. Given the aging population, it is expected that seniors will increasingly rely on public service programs to maintain safe and affordable living environments.

How were these needs determined?

Based on the needs analysis above, describe the State's needs in Colonias

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The cost of housing in Gresham has traditionally been more affordable than housing in Portland and many other surrounding cities in the metro area. As housing costs continue to rise in Portland, people are looking for lower-cost opportunities in East Multnomah County and Gresham. This demand has increased the cost of housing in Gresham for renters and homebuyers alike. According to Gresham's Housing Capacity Analysis for 2021-2041, the median housing prices have increased from approximately \$259,000 in 2015 to \$401,000 in 2020, a 55% increase, and rates of housing cost burden increased from 34% in 2000 to 44% in 2014-2018, with 21% of households being severely cost burdened. Increases in housing costs, coupled with stagnant wages and a lack of living wage employment in Gresham, has contributed to a lack of affordable housing options for households in low- and moderate-income levels.

Middle-income households have also felt the effects of rising housing costs compared to income. The *2019 Poverty in Multnomah County* report emphasizes that while Multnomah County has experienced strong economic growth over the past decade, this growth was driven by the incomes of the highest earning households, while wages have remained stagnant for other workers and employment alone is not enough to pull a household out of poverty. Housing costs are still unaffordable for many working families. HUD's Fair Market Rent for a 2-bedroom apartment in Multnomah County is \$1,536 per month. For a unit at that cost to be affordable, the household must earn at least \$26.58 per hour, while minimum wage in Oregon is only \$12.00 per hour as of April 2021. While modest minimum wage increases are planned in 2021 and 2022, the state minimum wage will still only be \$13.50 in July 2022, nearly half of the affordable housing wage for a current 2-bedroom apartment.

Residents displaced from Portland due to rising housing costs are vulnerable to further displacement if costs continue to rise in Gresham. The need for affordable housing is a consistent theme highlighted by participants in the City's annual needs hearings. Housing stability is critical to building strong, vibrant communities in Gresham. Continued displacement uproots families from their communities and can have other unintended consequences such as negative impacts on school performance for children in the household.

Housing condition is also a concern, especially with high turnover rates for rentals or vacant units. The City of Gresham was one of the first jurisdictions to establish (in 2007) a rental housing inspection program, funded primarily through modest rental license fees. The program results in periodic inspection of properties for compliance with a broad range of habitability standards including fire, life and safety code violations. Common violations found and corrected are visible mold, inadequate ventilation, illegal heat sources, plumbing disrepair, inoperable smoke detectors and exposed wiring.

The inspection program is a practical approach to raised expectations for both landlords and tenants and both benefit, as well, as the city as a whole.

In February 2020, Gresham City Council passed two code changes relating to the City's Rental Housing Inspection program. One of the changes requires landlords to present tenants with an informational handout titled, "Rights & Responsibilities of Landlords & Tenants" upon execution or renewal of a lease. The intent of the form is to increase both tenant and landlord knowledge of their respective responsibilities and rights. The form also includes a list of local resources. Gresham also changed City code to assess a fine upon property owners if a court determines they have retaliated against a tenant. These changes took effect on April 1, 2020.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	685	111	2	0	-2
Arts, Entertainment, Accommodations	5,177	3,903	13	14	1
Construction	2,508	1,551	6	5	-1
Education and Health Care Services	7,320	6,086	19	21	2
Finance, Insurance, and Real Estate	2,184	2,390	6	8	2
Information	774	243	2	1	-1
Manufacturing	4,973	5,735	13	20	7
Other Services	1,893	1,245	5	4	-1
Professional, Scientific, Management Services	3,133	795	8	3	-5
Public Administration	1	0	0	0	0
Retail Trade	5,586	4,458	14	15	1
Transportation and Warehousing	2,081	720	5	2	-3
Wholesale Trade	2,365	1,626	6	6	0
Total	38,680	28,863	--	--	--

Table 5 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	54,970
Civilian Employed Population 16 years and over	49,145
Unemployment Rate	10.61
Unemployment Rate for Ages 16-24	35.08
Unemployment Rate for Ages 25-65	6.46

Table 6 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector		Number of People
Management, business and financial	8,215	
Farming, fisheries and forestry occupations	2,130	
Service	6,785	
Sales and office	12,065	
Construction, extraction, maintenance and repair	4,480	
Production, transportation and material moving	3,095	

Table 7 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	25,290	55%

Travel Time	Number	Percentage
30-59 Minutes	16,410	36%
60 or More Minutes	4,090	9%
Total	45,790	100%

Table 8 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	5,925	540	2,640
High school graduate (includes equivalency)	10,605	1,190	4,340
Some college or Associate's degree	15,610	1,530	3,860
Bachelor's degree or higher	8,575	440	1,870

Table 9 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	340	1,290	1,180	1,625	855
9th to 12th grade, no diploma	1,605	1,560	1,515	1,930	1,155
High school graduate, GED, or alternative	3,890	4,435	3,970	7,735	3,920
Some college, no degree	3,415	4,600	3,400	7,450	3,505
Associate's degree	705	1,315	1,360	2,930	960
Bachelor's degree	605	2,305	1,835	3,690	1,635

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Graduate or professional degree	20	545	845	1,665	1,110

Table 10 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	38,211
High school graduate (includes equivalency)	26,927
Some college or Associate's degree	56,823
Bachelor's degree	39,326
Graduate or professional degree	101,651

Table 11 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

According to the 2015 5-year American Community Survey estimates, there were nearly 55,000 people age 16 and older in the civilian workforce employed in Gresham. Education and Health Care Services and Manufacturing are the largest employment sectors in Gresham, with 19% and 18% of Gresham’s jobs respectively, with the Retail sector coming in third at 14% and Arts, Entertainment and Accommodations at 12%.

Describe the workforce and infrastructure needs of the business community:

The City of Gresham is aggressively promoting changes in the City to improve the business climate and increase jobs. Gresham’s Small Business Center actively assists potential businesses in Central Rockwood, the Civic Neighborhood or Downtown. In Spring 2020, the City also launched a Small Business Grant program to provide critical working capital funds to small businesses suffering from financial hardship as a result of the COVID-19 pandemic. As of May 2020, 820 businesses have been helped to the benefit of both the business and the community.

The City has utilized Section 108 loan guarantee funds backed by CDBG grants to improve public facilities and infrastructure, accomplish eligible housing rehabilitation, and foster economic development activities. The Children’s Fountain in Downtown Gresham is one example of the City’s use of Section 108. The fountain, completed in 2014, has increased foot traffic to businesses in Downtown Gresham while eliminating blight by redeveloping a former bus yard into an accessible outdoor space for Gresham families to enjoy. Funds have been used in the past to meet City goals of promoting investment in low-income neighborhoods, leveraging additional funds to stimulate private development, achieving multiple affordable housing goals, and revitalizing neighborhoods, particularly in Rockwood.

The *Gresham Powell-Division Transit and Development Project Action Plan* (Urban Design and Planning Department 2015) outlines transit improvements (BRT, bus rapid transit) which will further enhance alternatives to cars in Gresham and regionally. The route in Gresham will focus on Division, connecting to Downtown Gresham and then to Mt. Hood Community College using Stark Street. This will stimulate more commercial development in Downtown and the Civic Neighborhood, bringing site improvements, along with housing and other amenities. Construction on the BRT is currently underway, with service to select stations beginning in April 2021.

Along with infrastructure needs and planned improvements, workforce training is essential. There is a large existing employment base, including Boeing, the US Bank Processing Center and several technology and electronic firms in Gresham. There are gaps in skills of the existing workforce to meet needs in some of these industries. There are also gaps in entry-level skills, for example many of those seeking employment do not understand or follow the basics of becoming a valued employee.

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

Gresham’s Economic Development Traded Sector Jobs Strategy contains two goals, the first related to manufacturing and the second to professional services. Both the goals and strategies build on existing assets in Gresham – there is already a strong economic base in the two target opportunity areas: advanced electronics and specialized machinery and equipment. The goal related to manufacturing is to strengthen and grow the existing manufacturing sector, retaining and creating family-wage jobs by retaining existing companies and recruiting new ventures within the opportunity areas. The goal related to professional services is to encourage job creation and new investment in Gresham’s industrial and regional centers. The City provides incentives including rapid land use review and approval, shepherded process for new industrial projects, access to New Industries Grant funds, and specialized zones (Enterprise and Strategic Investment) to financially benefit new qualifying developments.

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

The level of educational attainment in Gresham is low compared to Oregon overall. According to the data tables above, 19.4% of Gresham residents age 25 and over had a bachelor's degree or higher, compared to 30.8% for Oregon statewide. At the other end of the spectrum, 15.8% of Gresham residents (age 25 or older) did not have a high school diploma or equivalency compared to 10.2% in Oregon.

Lower education levels correspond to lower earnings, whether the individuals hold jobs in Gresham, or elsewhere region. According to the 2019 ACS 5-Year Estimates the median earnings for all workers in Gresham was \$35,644 compared to \$43,408 for workers in Portland. These are median values across all workers whether or not they were working full-time, year-round. Median earnings for Gresham male residents was \$40,334 (nearly 15% lower than for Portland residents) and median earnings for Gresham female residents was \$30,231 (24.5% lower than Portland). Whether or not the workers commute, earnings of Gresham residents are lower than those of Portland residents.

Unemployment was also slightly higher (2019 5-year ACS) for Gresham workers (4.0%) than for Portland workers (3.4%). This is a pre-pandemic estimate, so it is expected that unemployment rates are currently significantly higher. According to Bureau of Labor Statistics national estimates for 2020, a person with a bachelor's degree earned \$1,305 per week (median) with an unemployment rate of 5.5%, while persons with less than a high school diploma earned just \$619 a week with an associated unemployment rate of 11.7%. Young adults, particularly persons of color, have much higher levels of unemployment.

Illustrative of the challenge of improving employability and earning capacity of Gresham's vulnerable youth are findings from the 2014 report *Multnomah County Comprehensive Gang Assessment* (Lore Joplin Consulting). The report identified several low-income neighborhoods associated with high densities of students on free and reduced-cost meals in Rockwood and North Gresham. High drop-out rates, high school suspensions and low graduation and performance limit the ability of youth to thrive in adulthood.

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

The Workforce Investment Board 2013-2015 Strategic Plan is a post-2008 recession call to action in response to job losses, stagnating incomes, changing industries, poverty and gaps in skills. The plan calls for engaging public and private partners to identify needs and provide pathways to having a skilled workforce in place, bringing in diverse populations including disadvantaged youth and others with barriers to finding and sustaining employment. Among the strategies is to enhance work-based learning. The Columbia-Willamette Workforce Collaborative represents

a partnership focused on coordinating ideas and strategies. Three targeted sectors have been identified by the Collaborative: health care, advanced manufacturing, and IT/software. Projected openings over the next several years indicate that there will be a demand for skilled workers and a path available for living-wage and family-wage jobs.

Gresham is a partner in these regional efforts. In addition, Gresham has identified gaps and needed skills for industries currently in place in Gresham and nearby and those likely to grow in the future. A number of programs are in place in Gresham and the region to increase skills of the workforce to improve employment options and more closely match the needs of local industries. These include programs offered by Worksystems, Inc. (WSI), noted above. With assistance from local industries, Mt. Hood Community College in Gresham recently developed a curriculum for a Mechatronics program. This program provides skills needed to understand the link between software programs and the mechanical systems they run and expands knowledge and skills in both components and the interface between them. Additionally, to address the future jobs pipeline for local Gresham and East Multnomah County industries, the City is partnering with local school districts and the Gresham Area Chamber of Commerce to support a staff person to coordinate partnerships between industry and educators to address skill gaps and prepare the future workforce.

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

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

The City of Gresham participates in the Greater Portland Economic Development District, staffed by Greater Portland Inc (GPI) as part of a multi-county and two-state region. GPI is currently in the process of updating the Comprehensive Economic Development Strategy (CEDS) document which will focus on three primary goals to address long term recovery due to the impacts of the COVID 19 pandemic. The first is to foster upward economic mobility through providing comprehensive and coordinated skills development starting with childcare through higher ed, including vocational, post-secondary and lifelong learning. This goal will also be supported through expanding economic opportunities for all individuals with a focus on BIPOC and underrepresented communities.

The second goal of the strategy is to support a competitive economy through the development of an entrepreneurial ecosystem that supports robust local small businesses and scales traded sector industry. It also focuses on investment in innovations that will strengthen and grow the Portland region traded sector industry clusters and enhancement of the Portland regional identity and brand for talent, capital and business. The third and final goal of the strategy is to build a resilient region by constructing resilient regional infrastructure and strategically investing in public

policies that align with economic development priorities. Actions associated with this goal include addressing the supply of affordable housing and providing homeless services. The City of Gresham will work to align local recovery policies and efforts with the wider regional goals and objectives adopted in the CEDS.

Discussion

MA-50 Needs and Market Analysis Discussion

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

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

The Consortium has defined areas of racial and ethnic concentration as those that are twice the average in Multnomah County. For Gresham that includes all of Rockwood. Looked at from another perspective (access to opportunities and a mix of factors limiting access), there are several areas of vulnerability in Gresham. According to the 2015 report by ECONorthwest (*Gresham Neighborhood Change Analysis*), several Gresham neighborhoods are most vulnerable to rising housing costs. Gresham has higher concentration of vulnerable populations including renters, non-white residents, workers without a bachelor's degree, and low- and moderate-income households. Looking at areas of vulnerability from a regional perspective, most vulnerable areas are in east Portland, Gresham, along I-205 and west of Highway 217. Areas in Gresham with higher probabilities of displacement because of the combination of higher risk populations and rising rents include Rockwood and Downtown.

In Gresham, 33 of 67 block groups meet low-mod qualifications with 51% or more of the population in these block groups living in households with incomes at or below 80% of area median (as determined by HUD). The Rockwood area (west of SE 202nd Avenue and north of Stark Street) and block groups bordered by SE Stark Street on the north and NE Kane Drive on the east along Burnside Avenue contain the largest concentrations of low-mod block groups in Gresham.

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

Areas previously described as having concentrations of low-income and minority households are also among those with housing problems. Data are not available to narrowly define housing markets however, input from community participants repeatedly report housing problems as a priority concern.

There is a need for housing in good condition in safe neighborhoods that fit the incomes of households that live there. Gentrification and rising housing costs in Portland have been the impetus for relocation to East Multnomah and Gresham. This has increased the demand for affordable housing and raised housing costs in Gresham, putting low-income and marginalized residents at higher risk of displacement or homelessness. According to Gresham's Housing Capacity Analysis for 2021-2041, the median housing prices have increased from approximately \$259,000 in 2015 to \$401,000 in 2020, a 55% increase, and rates of housing cost burden increased from 34% in 2000 to 44% in 2014-2018, with 21% of households being severely cost burdened. Households that are overburdened with housing costs are at higher risk of homelessness, are more likely to be forced to choose between paying for housing or other necessities

such as food or medical care and are more likely to live in overcrowded conditions and substandard housing. The COVID-19 pandemic has likely increased the vulnerability for many low-income households, as many have lost jobs due to statewide shutdowns and decreased tourism.

Are there any community assets in these areas/neighborhoods?

Rockwood is a prime area of concern and is a focus of programs to enhance assets. It is a very diverse, culturally rich area of Gresham. As such, there is much effort to revitalize Rockwood. The Rockwood Public Safety Facility, built in 2013, improves Gresham Police presence and visibility in Rockwood, provides a facility that is welcoming to citizens. The facility houses a range of functions, including, East Metro Gang Enforcement Team, Gresham Police Traffic Unit, Patrol and detective units and a community meeting room.

Additionally, the City entered into a Section 108 loan with Open Meadow School for acquisition and construction of a new 7th–12th grade college prep school, which opened its doors in 2016. On the same site as Open School, development for a new Boys & Girls Club finished in 2017. The new Club facility is approximately 30,000 square feet occupying 1.7 acres. The Latino Network is also located on this campus. Investments in street improvements and enhanced street crossings were also funded by the City at this location.

The redevelopment of the former Fred Meyer site into Downtown Rockwood, a community hub that focuses on economic revitalization and community development in the City's low-income Rockwood neighborhood, has broken ground and completed the Innovation Hub, which is the first of three buildings planned for the site. The Innovation Hub, which will house tenants including the Mt. Hood Small Business Development Center, Little Wings Academy, and WorkSource Portland Metro, was completed in October 2020 and will open to the public in 2021. These tenants will bring much needed services to assist Rockwood residents with job training, business development and childcare needs. The site will also house a market hall for groceries and local food vendors, mixed income apartments and a community plaza.

The City recently approved two large affordable housing construction projects in Rockwood from the local share of Metro's Affordable Housing Bond. The two developments will create 374 affordable housing units.

Are there other strategic opportunities in any of these areas?

East Multnomah County and the entire corridor between Portland and Gresham is the focus of regional planning including housing, transportation and recreation. Transportation enrichment will increase access to employment and education. The Rockwood Rising redevelopment project will continue to develop the site, adding a market hall and mixed income apartments. The project is also a strategy to revitalize the neighborhood and increase local community access to food retailers and other services. In

addition to meeting the needs of this highly diverse, growing, young and family-oriented community, the idea is to create a colorful, innovative and authentic destination to attract visitors to Rockwood.

The City of Gresham and regional partners are striving to employ strategies to reduce homelessness and problems related to lack of services while enhancing opportunities targeted to regional improvements and reflecting community-defined skills. In Rockwood, for example, residents have helped define business opportunities.

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

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

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

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

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

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

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The following sections outline the priority needs and associated goals for the Consortium and for the City of Gresham. Priorities were established after review of information and outreach within the community to residents and to providers of services.

The priority needs are:

- Affordable housing choice
- Basic services & homeless prevention/intervention
- Community & economic development

Priority goals are:

- Increase and preserve affordable housing choice of rental and homeownership units for low- and moderate-income households in ways that promote racial equity.
- Reduce and prevent homelessness, including mitigating the overrepresentation of Black, Indigenous, and People of Color experiencing housing instability.
- Improve livability and promote economic development in low and moderate-income areas by investing in community infrastructure, employment training and anti-poverty strategies for area residents.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 12 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

The City of Gresham has not identified specific geographic target areas for this plan. Allocations are normally made for projects applicable to low-income persons and/or qualifying low-income neighborhoods. The City has set as a priority investing in community infrastructure development and redevelopment in lower-income neighborhoods to safeguard public health, improve livability and promote economic development. Where possible, funds will be leveraged to make substantial improvements in those areas, including increasing economic opportunities. The City works with regional partners to make significant improvements along transportation corridors and in areas targeted for urban renewal, including Central Rockwood, the Civic Neighborhood, and Downtown. The City will continue to view projects with the objective of maximizing impact from investment.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 13 – Priority Needs Summary

1	Priority Need Name	Affordable housing choice
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Increase & preserve affordable housing choice

	Description	<p>The cost of housing in Gresham has traditionally been more affordable than in Portland. With continuing rising prices in Portland, people are looking for lower-cost opportunities in east Multnomah County and Gresham. This demand, along with an increase in population, has influenced the cost of housing, both for homebuyers and renters. According to Gresham’s Housing Capacity Analysis for 2021-2041, the median housing prices have increased from approximately \$259,000 in 2015 to \$401,000 in 2020, a 55% increase, and rates of housing cost burden increased from 34% in 2000 to 44% in 2014-2018, with 21% of households being severely cost burdened. Households that are overburdened with housing costs are at higher risk of houselessness, are more likely to be forced to choose between paying for housing or other necessities such as food or medical care and are more likely to live in overcrowded conditions and substandard housing. Ensuring appropriate housing for all populations (persons with disabilities, seniors, young households just starting out, skilled workers and families) and choices in price is recognized as essential to a vibrant city and to a vibrant economy.</p>
	Basis for Relative Priority	<p>Each of the three needs is related and of top priority to Consortium members. The priority status of the need for affordable housing choice is supported by Comprehensive Plans, regional housing plans, the 10-year plan to end homelessness and input from community members and other stakeholders.</p> <p>The City and it's subrecipients intend to target CDBG assistance as is the Consortium with all of the funding going to low-mod income households. When appropriate funding will go to extremely low and low income households.</p>
2	Priority Need Name	Basic services & homeless prevention/intervention
	Priority Level	High

<p>Population</p>	<p>Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence</p>
<p>Geographic Areas Affected</p>	
<p>Associated Goals</p>	<p>Reduce homelessness & increase stability</p>
<p>Description</p>	<p>Demand for activities that reduce or prevent homelessness exceeds service provider capacity. Gresham is a partner in the Continuum of Care and A Home for Everyone applies to needs in Gresham and countywide. Gresham and East Multnomah County are seeing increasing needs as people leave Portland looking for more affordable housing. According to 2014 Poverty in Multnomah County Report, poverty is increasing and is shifting into East Multnomah County. People in poverty are more likely to be overburdened with housing costs and more vulnerable to losing their housing. Since people of color are overrepresented in the population of households living in poverty, the risk of houselessness disproportionately impacts households of color. Gresham prioritizes safety net programs that prevent homelessness, as they prevent residents from experiencing the trauma of houselessness, prevent future barriers to housing such as evictions, and are more cost effective than housing placement.</p>

	Basis for Relative Priority	<p>Each of the three needs is related and of top priority to Consortium members. The priority status of the need for basic services and homeless prevention/intervention is supported by human services plans (domestic violence, seniors, mental health, substance abuse, youth, gang violence) and by the 10-year plan to end homelessness and input from community members and other stakeholders.</p> <p>The City and its subrecipients intend to target CDBG assistance as is the Consortium with all of the funding going to low-mod income households. When appropriate funding will go to extremely low and low income households.</p>
3	Priority Need Name	Community & economic development
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Infrastructure, facilities & economic opportunity
	Description	Establishing safe neighborhoods with access to necessary services and economic development opportunities is essential to building and maintaining vibrant, sustainable communities. The City of Gresham has extensive needs for public facilities. There are currently no community centers, limited recreation facilities and one small senior center in Gresham. Community gathering places and safe recreation opportunities for youth are priorities. Improved transportation, including multimodal transportation options is a regional priority. Job training and microenterprise assistance are priorities to provide residents with opportunities to advance their career opportunities, increase their wages and start small businesses within the community.

<p>Basis for Relative Priority</p>	<p>Each of the three needs is related and of top priority to Consortium members. The priority status of the need for community and economic development is supported by Capital Improvements Plans, regional economic development plans, and regional transportation plans, as well as input from community members and other stakeholders.</p> <p>The City and it's subrecipients intend to target CDBG assistance as is the Consortium with all of the funding going to low-mod income households. When appropriate funding will go to extremely low and low income households.</p>
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Narrative (Optional)

For all of the Consortium programs the majority of resources are allocated to projects and programs that benefit extremely low and low income households. The PY 2019 Gresham CAPER reported 100% of funds went to projects assisting primarily low and moderate income households.

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,110,899	0	9,000	1,119,899	4,443,596	

Table 14 - Anticipated Resources

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

The City of Gresham independently, and as part of the HOME Consortium with the City of Portland and Multnomah County, makes every effort to leverage HUD grant funds with other public and private investments. Housing development and rehabilitation activities are highly leveraged because public funds are used as “last in” gap financing amounts, which requires that more substantial investments are in place. In the 2020-2021 fiscal year, Gresham leveraged almost three times the amount of CDBG-expended funding from other sources – other federal, state/local, private and in-kind. The Portland Housing Bureau as the Consortium lead makes required matches for use of HOME funds.

In the months and years ahead, communitywide efforts will continue to move forward to find increased opportunities to leverage and better align economic opportunities and resources to support housing stability and reduction in homelessness.

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

The City of Gresham does not anticipate the use of publicly-owned land or property in projects currently planned or underway. If those opportunities arise, however, such land and property will be included to the extent practicable.

Discussion

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Gresham	Government		Jurisdiction

Table 15 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Gresham works with Consortium members and partner agencies to coordinate administration of limited funds. These continued partnerships aim to reduce redundancies and target projects to priority needs. Remaining gaps are those resulting from limited resources in light of growing needs.

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

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

Other			

Table 16 - Homeless Prevention Services Summary

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

While services are available in most critical areas of need, it is a challenge to provide the quantity and level of services to meet the need. For example, while rental assistance is available to intervene and prevent homelessness, funding often runs out well before the entire need is met for the year. With skyrocketing rents, programs that assist households with housing costs are able to help fewer clients with the same amount of funding annually. The COVID-19 pandemic has also increased the amount of assistance needed to stabilize the average household.

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

Consortium partners work closely with nonprofit housing developers to coordinate activities and leverage funds. Members also participate in the Continuum of Care and jointly prioritize goals and strategies as outlined in the 10-year plan A Home for Everyone. These and other partnerships intend to align services with needs. Many service providers are spread too thin, especially as the pandemic has dramatically increased needs. Many basic and support services are lacking. Childcare, for example, is extremely limited. Efforts to increase self-sufficiency of clients seeking change are limited by the many barriers in place – lack of transportation, lack of childcare, lack of family wage jobs.

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

Consortium members and the City of Gresham will continue to work locally and regionally to increase coordination of services and to enhance delivery capacity. Consortium members also look forward to a stronger coordination with regional transportation and economic development plans that put forth the same priorities for services, economic opportunity, housing choice, infrastructure and community development as are referenced in this strategic plan.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase & preserve affordable housing choice	2021	2025	Affordable Housing Public Housing Homeless		Affordable housing choice	CDBG: \$900,000	Public service activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted Rental units rehabilitated: 50 Household Housing Unit Homeowner Housing Rehabilitated: 130 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Reduce homelessness & increase stability	2021	2025	Homeless Non-Homeless Special Needs		Basic services & homeless prevention/intervention	CDBG: \$450,000	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 200 Households Assisted
3	Infrastructure, facilities & economic opportunity	2021	2025	Non-Housing Community Development		Community & economic development	CDBG: \$3,000,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 15000 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 1875 Persons Assisted Businesses assisted: 100 Businesses Assisted

Table 17 – Goals Summary

Goal Descriptions

1	Goal Name	Increase & preserve affordable housing choice
	Goal Description	Increase and preserve affordable housing choice of rental and homeownership units for low- and moderate-income households in ways that promote racial equity. Projects accomplishing this goal include home repair, down payment assistance, support for new housing development, affordable housing development, rental housing rehabilitation and permanent supportive housing.
2	Goal Name	Reduce homelessness & increase stability
	Goal Description	Reduce and prevent homelessness, including mitigating the overrepresentation of Black, Indigenous, and People of Color experiencing housing instability. Projects meeting this goal will likely include support of tenant based rental assistance, supportive and emergency services, transitional housing, shelters, Fair Housing education, and support for development of life skills.
3	Goal Name	Infrastructure, facilities & economic opportunity
	Goal Description	Improve livability and promote economic development in low and moderate-income areas by investing in community infrastructure, employment training and anti-poverty strategies for area residents. Projects that support the goal of infrastructure, facilities and economic opportunities include maintaining and improving infrastructure, streets, sidewalks, lighting and other safety measures, providing improvements to make streets and public places accessible to those with disabilities, improving parks and recreational opportunities for youth, support for businesses, microenterprises and business development, improving multimodal transportation options and enhancing safety in neighborhoods.

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

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

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

The City of Gresham implements its CDBG and HOME programs in compliance with requirements of the Residential Lead-Based Paint Reduction Act. None of the programs or projects currently funded by Gresham provides in excess of \$5,000 in rehabilitation assistance. Notification and visual inspection requirements will be followed for Gresham's HOME funded homeownership programs. The City of Gresham provides brochures about safe lead practices as part of the homebuyer assistance efforts. Buyers and sellers are required to sign certifications. Inspectors employed in the Rental Inspection Program are trained and certified in safe practices. In addition, Gresham provides brochures in their Permit Center. The City will look for opportunities, in the future, to increase the capacity to reduce lead-paint hazards.

Multnomah County complies with federal regulations and continues to work towards increasing small Lead Based Paint contractors through building their capacity through education and safe work practices. The City of Portland has successfully administered three HUD Lead Hazard Reduction Grants, providing over \$12 million dollars in lead hazard reduction assistance to over 1,000 low-income households (protecting over 1,200 children from lead poisoning) since 1998.

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

Housing that receives public resources is tested for lead hazards and plans are included to make the home lead safe. Public education about lead hazards includes access to affordable lead testing. Lead-safe practices are required in all rehabilitation programs where housing was constructed prior to 1978, as described above.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

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

The City of Gresham has supported a number of projects over the years, and in the current year, to reduce the level of poverty and increase the capacity of families to earn living wages. Workforce development and training efforts are supported through the Living Solutions program which assists low-income persons to gain job skills and then places those individuals in career-path jobs. The City is also working with regional partners to improve the transportation system, notably the bus-rapid-transit system (BRT) along Powell and Division and to the employment campuses in northeast Gresham, including Mt. Hood Community College. The BRT along Powell and Division is currently under construction and select stations opened for service in April 2021.

The City sponsors a program to encourage small businesses by offering incentives for permits and licenses for remodeling and façade improvements for vacant and some occupied business spaces. The Small Business Center actively assists potential businesses in Central Rockwood, the Civic Neighborhood or Downtown. In Spring 2020, the City also launched a Small Business Grant program to provide critical working capital funds to small businesses suffering from financial hardship as a result of the COVID-19 pandemic. As of May 2020, 820 businesses have been assisted to the benefit of both the business and the community.

The City is a partner in the Comprehensive Economic Development Strategy (CEDS) and supports links between industry and education (at the K-12 and higher education levels), supports diversity in the workplace and in industry, and supports activities raising the skills and employability of underrepresented and disadvantaged populations. The Economic Development Traded Sector Jobs Strategy defines the City's vision for targeted job growth and development which relies on existing industry sectors: advanced electronics and specialized machinery and equipment. An integral component is supporting a trained workforce. Part of this development incorporates efforts by WorkSource WSI) and Mt. Hood Community College which currently offers an industry-supported curriculum in mechatronics (the interface between machines and software).

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

The City of Gresham actively works to affirmatively further fair housing through its Rental Inspection Program. The City inspects all multifamily units throughout the City on both a mandatory and complaint basis. The complaint-driven component provides protections for those reporting the violations to the greatest extent possible. Inspections focus on a broad range of habitability standards, while the primary focus is on fire, life and safety issues. The program has proven to improve living conditions for all Gresham residents and has elicited positive feedback. In February 2020, Gresham City Council passed two code changes relating to the City's Rental Housing Inspection program. One of the changes requires landlords to present tenants with an informational handout titled, "Rights & Responsibilities of

Landlords & Tenants” upon execution or renewal of a lease. The intent of the form is to increase both tenant and landlord knowledge of their respective responsibilities and rights. The form also includes a list of local resources. Gresham also changed City code to assess a fine upon property owners if a court determines they have retaliated against a tenant. These changes took effect on April 1, 2020.

To further the objective of quality housing for all segments of the population, the City supports rehabilitation of units to provide permanent accessibility for persons with disability and home repair assistance for lower-income households. In addition, the City provides assistance for lower-income homebuyers in the form of down payment assistance and through funding for the community land trust, Proud Ground, using HOME funds.

City Council initiated a Housing Task Force in 2018 comprised of a wide range of community stakeholders to recommend actions in support of housing needs in our community. The task force assessed the current state of housing in the City, identified best practices and created a report detailing their findings and recommendations in September 2019. The final report highlighted the changing demographics and increased diversity in Gresham. Gresham is relatively affordable compared to other communities in the Portland metro region, so many families move to Gresham as rent increases in other areas. This has created an increase in competition for housing and higher rents in Gresham, resulting in fewer housing choices available to working families and seniors on fixed incomes. Since the last recession in 2008, Gresham has added approximately 1,000 additional housing units, which is not enough to keep up with increasing demands. The task force identified a need for additional housing in Gresham across all income levels.

The City adopted several guiding principles regarding housing as a guide for affordable housing. In essence these principles recognize that everyone in Gresham deserves a decent, safe and affordable place to live and that sustainable and vibrant communities require a balance of jobs, housing and services. The principles recognized early on that concentrations of poverty and minority populations could block access to opportunities, which is reflected in national policies to promote equal opportunities in all neighborhoods (Affirmatively Furthering Fair Housing). The City promotes a diversity of housing types across all neighborhoods and recognizes that publicly-assisted housing is one component. The City is committed to fostering housing options that working individuals and families can afford. The City will look for new opportunities to preserve and expand housing options for all residents, including low-income residents who need ongoing support.

SP-80 Monitoring - 91.230

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

The City of Gresham provides monitoring for CDBG and HOME funded projects. Monitoring activities may include program performance, accountability and regulatory compliance and may involve desk monitoring and/or on-site monitoring. An objective of all desk and on-site monitoring is to ensure that the City will meet the goals and objectives set forth in the Consolidated Plan.

Desk monitoring consists of completion of Risk Assessment and Desk Monitoring checklists; as well as, reviews of invoices and progress reports, external audits and other materials submitted by the contracting agency. This monitoring is to determine that the project is on schedule, fiscally accountable and compliant with contractual requirements and regulations. On-site monitoring can include any or all of the following: program and systems review at the subrecipient facility (e.g., income verification forms and process for collecting information), visiting sites where the activity is being carried out (e.g., a house under construction or the operation of a public service activity) or has been completed (in the case of property improvements), interviewing agency staff, and accounting and systems review.

CDBG and HOME funded projects are desk monitored annually, with onsite monitoring occurring at least once every three years. Additional onsite monitoring may occur for high risk projects: Those organizations with turnover in key positions, such as executive director or program manager responsible for the program being funded or organizations that don't have familiarity with CDBG/HOME regulations.

Due to the COVID-19 pandemic, in person monitoring site visits have been on hold until it is safe to resume these monitoring activities.

For all housing projects for which the City provides funding for construction, a City building inspector and Community Revitalization staff monitor the progress of the project in the field and Community Revitalization staff monitors overall progress.

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,110,899	0	9,000	1,119,899	4,443,596	

Table 18 - Expected Resources – Priority Table

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

The City of Gresham independently, and as part of the HOME Consortium with the City of Portland and Multnomah County, makes every effort to leverage HUD grant funds with other public and private investments. Housing development and rehabilitation activities are highly leveraged

because public funds are used as “last in” gap financing amounts, which requires that more substantial investments are in place. In the 2020-2021 fiscal year, Gresham leveraged almost three times the amount of CDBG-expended funding from other sources – other federal, state/local, private and in-kind. The Portland Housing Bureau as the Consortium lead makes required matches for use of HOME funds.

In the months and years ahead, communitywide efforts will continue to move forward to find increased opportunities to leverage and better align economic opportunities and resources to support housing stability and reduction in homelessness.

In the months and years ahead, communitywide efforts will continue to move forward to find increased opportunities to leverage and better align economic opportunities and resources to support housing stability and reduction in homelessness.

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

The City of Gresham does not anticipate the use of publicly-owned land or property in projects currently planned or underway. If those opportunities arise, however, such land and property will be included to the extent practicable.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase & preserve affordable housing choice	2021	2025	Affordable Housing Public Housing Homeless		Affordable housing choice	CDBG: \$186,000	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 26 Household Housing Unit
2	Reduce homelessness & increase stability	2021	2025	Homeless Non-Homeless Special Needs		Basic services & homeless prevention/intervention	CDBG: \$95,735	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 200 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Infrastructure, facilities & economic opportunity	2021	2025	Non-Housing Community Development		Community & economic development	CDBG: \$614,480	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted Businesses assisted: 25 Businesses Assisted

Table 19 – Goals Summary

Goal Descriptions

1	Goal Name	Increase & preserve affordable housing choice
	Goal Description	
2	Goal Name	Reduce homelessness & increase stability
	Goal Description	
3	Goal Name	Infrastructure, facilities & economic opportunity
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

The 2021 Annual Action Plan outlines projects meeting needs identified in the 2021-2025 Consortium Consolidated Plan, opportunities in Gresham and City priorities. Initial project recommendations were made in consultation with the Community Development and Housing Subcommittee which reviewed and evaluated applications. Part of the review process was consideration of the ability of local and regional agencies and partners to successfully achieve objectives and administrative demands, including monitoring. The City Council made the final decisions on projects.

#	Project Name
1	2021 Gresham Administration
2	2021 Consolidated Plan & Action Plan Coordination
3	2021 Children's Fountain Principal & Interest Payment
4	2021 Children's Fountain Prepayment
5	2021 Adapt-A-Home
6	2021 Mend-A-Home
7	2021 Willow Tree
8	2021 Tenant Based Rent Assistance Activity Delivery
9	2021 Living Solutions
10	2021 El Programa Hispano Catolico
11	2021 Family of Friends Mentoring
12	20201 AARP Experience Corps Mentoring
13	2021 Eastside Timbers
14	2021 MESO Microenterprise Assistance
15	2020-2025 Park Improvements Project

Table 20 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Gresham allocates CDBG and HOME funds through a competitive process, with review and input provided by the Community Development and Housing Subcommittee, a 8-person citizen advisory group, along with scoring and review by a technical advisory group made up of internal finance and program staff. Distributions are made in the following prioritized categories: public improvements, housing development/rehabilitation, economic development, and public services. Further, the City gives priority to projects that promote investment in low-income neighborhoods, leverage additional revenue to stimulate private development, achieve multiple affordable housing or other CDBG priorities; work toward revitalization of the Rockwood Town Center; and, help promote redevelopment of Downtown.

The primary barrier is decreasing funding in light of increasing demands for projects and services. It is challenging, if not impossible, to make significant changes in the face of changing economies and

decreasing levels of public support (federal, state and local) for badly needed projects in all categories.

AP-38 Project Summary

Project Summary Information

1	Project Name	2021 Gresham Administration
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice Reduce homelessness & increase stability Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Basic services & homeless prevention/intervention
	Funding	CDBG: \$213,979
	Description	General management, oversight and coordination, staffing of advisory committee (CDHS), contract preparation, environmental review, management of project selection process.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	2021 Consolidated Plan & Action Plan Coordination
	Target Area	

	Goals Supported	Increase & preserve affordable housing choice Reduce homelessness & increase stability Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Basic services & homeless prevention/intervention Community & economic development
	Funding	CDBG: \$10,000
	Description	Payment to City of Portland (PHB) for Consolidated Plan/Annual Action Plan coordination with the consortium members and administration of the countywide advisory committee.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
3	Project Name	2021 Children's Fountain Principal & Interest Payment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$80,000
	Description	Children's Fountain Principal and Interest Section 108 Loan Payment.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
4	Project Name	2021 Children's Fountain Prepayment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$50,000
	Description	Prepayment for the Children's Fountain Section 108 loan.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	2021 Adapt-A-Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	

	Funding	CDBG: \$100,000
	Description	Home accessibility modifications for 20 low- and moderate-income seniors and people with physical disabilities. Clients may be homeowners or renters, but for rental units the landlord will agree to keep accessibility improvements in place to create a permanently accessible unit.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	2021 Mend-A-Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$80,000
	Description	Critical home repairs for 16 low- and moderate-income homeowners so that they can continue to live in the Gresham community in a safe, secure and functional home.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	
7	Project Name	2021 Willow Tree
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$48,562
	Description	Human Solutions Willow Tree program will provide stabilization services for 80 Gresham individuals at risk of homelessness. Up to 3 months of emergency rent assistance may be provided per household in addition to childcare and other supportive services. The activity carried out for this project will be a public service activity.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	2021 Tenant Based Rent Assistance Activity Delivery
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$47,173
	Description	Provides rent assistance activity delivery costs for Human Solutions HOME funded TBRA program to prevent homelessness by assisting 40 very low and low-income Gresham households.

	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
9	Project Name	2021 Living Solutions
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$262,735
	Description	Living Solutions will provide employment services to 110 Gresham residents with incomes under 30% MFI. Services include: comprehensive assessments, job-readiness support & skill-building, job training, and job placements focused on career track employment. This includes serving 20 individuals within the Gresham's immigrant and refugee community.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
	Project Name	2021 El Programa Hispano Catolico

10	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$50,000
	Description	El Programa Hispano Catolico will provide culturally relevant job training services for 50 Gresham residents. The activity carried out for this project will be a public service activity.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
11	Project Name	2021 Family of Friends Mentoring
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$16,000
	Description	Funds will be used to recruit, train, screen, match, support and evaluate 5 Gresham children and families with 5 volunteer mentors and to support 5 existing Gresham matches. The activity carried out for this project will be a public service activity.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
12	Project Name	20201 AARP Experience Corps Mentoring
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$18,000
	Description	Funds will be used to recruit and train senior mentors to support 30 at risk kindergarten to 3rd grade students. The activity carried out for this project will be a public service activity.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
13	Project Name	2021 Eastside Timbers
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development

	Funding	CDBG: \$24,000
	Description	After school soccer program and/or league soccer scholarships for 300 low- and moderate-income Gresham youth.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
14	Project Name	2021 MESO Microenterprise Assistance
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$63,745
	Description	Technical assistance for 25 microenterprises to assist low- and moderate-income Gresham entrepreneurs with starting or growing their small businesses.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

15	Project Name	2020-2025 Park Improvements Project
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$125,919
	Description	Infrastructure improvements such as playground equipment, basketball courts, and bathrooms for Gresham parks serving low- and moderate-income neighborhoods.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City of Gresham has not identified specific geographic target areas for this plan, projects are citywide. Allocations are normally made for projects applicable to low-income persons and/or qualifying low-income neighborhoods. The City has set as a priority investing in community infrastructure development and redevelopment in lower-income neighborhoods to safeguard public health, improve livability and promote economic development. Where possible, funds will be leveraged to make substantial improvements in those areas, including increasing economic opportunities. The City works with regional partners to make significant improvements along transportation corridors and in areas targeted for urban renewal, including Rockwood, the Civic Neighborhood, and Downtown. The City will continue to view projects with the objective maximizing impact from investment.

Geographic Distribution

Target Area	Percentage of Funds

Table 21 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Actions planned to address obstacles to meeting underserved needs

Gresham is seeing an increase in poverty as a result of households moving into Gresham to find more affordable housing, including that affordable to working families. The City prioritizes projects to assist families achieve self-sufficiency and increase earning capacities. Projects included in the annual plan speak to those efforts. In addition, the City works closely with long-term partner providers to reach out to persons in need, including in language and culturally appropriate methods. Participating in regional transportation and economic efforts, the City seeks to create vibrant hubs and to increase employment, including local entrepreneurs. Gresham continues a strong monitoring practice to maximize the efficacy of funded efforts.

The City continues to work with the Department of Land Conservation and Development and Oregon Housing and Community Services on policy resources to assist in housing development and services. The City works with partners (The Division Transit Project, Metro, TriMet, the City of Portland, the Oregon Department of Transportation and Multnomah County) to meet transportation needs of Gresham residents and bring key investments to Gresham. Along with transit elements, plans call for actions regarding safety, economic development, community enrichment and housing.

Actions planned to foster and maintain affordable housing

The City of Gresham supports quality housing that is affordable to all residents. The Rental Inspection Program has been in place since 2007 and has been a model for other jurisdictions. The program results in periodic inspections for compliance with a broad range of habitability standards. Common violations found and corrected are visible mold, inadequate ventilation, illegal heat sources, plumbing disrepair, inoperable smoke detectors, and exposed wiring. In February 2020, Gresham City Council passed two code changes relating to the City's Rental Inspection Program. One change requires landlords to present tenants with an informational handout titled, "Rights & Responsibilities of Landlords & Tenants" upon execution or renewal of a lease. The intent of the form is to increase both tenant and landlord knowledge of their respective responsibilities and rights. The form also includes a list of local resources. Gresham also changed City code to assess a fine upon property owners if a court determines they have retaliated against a tenant.

The City supports rehabilitation of units to provide permanent accessibility for persons with disabilities and home repair assistance for lower-income households. In addition, the City assists lower-income homebuyers with HOME funds through the City's WELCOME HOME down payment assistance program and through Proud Ground.

The City is also improving an array of housing choices for residents in the future. The City's Housing Policy project provided housing data and information on housing trends used to develop housing goals,

policies and action measures for Gresham. City Council initiated a Housing Task Force in 2018 comprised of a wide range of community stakeholders to recommend actions in support of housing needs in our community. Task Force recommendations were finalized in September 2019 and included an increase in services for renters, down payment assistance for homebuyers and rental assistance for renters, strengthening the City's Rental Inspection Program, providing education opportunities for renters, homebuyers and landlords and monitoring and supporting the implementation SB608, which provides a rental regulations for landlords in Oregon.

In November 2018 regional voters passed the Regional Affordable Housing Bond, which provides funding for the development of affordable housing. Gresham has collaborated with Metro to create an Intergovernmental Agreement for this funding and develop a plan that addresses local needs to utilize its share of this funding, which will create 187 housing units in the City. Gresham is currently identifying initial housing investments to receive bond funding.

The City adopted several guiding principles regarding housing which recognize that everyone in Gresham deserves a decent, safe and affordable place to live and that sustainable and vibrant communities require a balance of jobs, housing and services. The principles recognize that concentrations of poverty and minority populations may block access to opportunities, which is reflected in national policies to promote equal opportunities in all neighborhoods. The City is committed to fostering housing options that working individuals and families can afford and will look for new opportunities to preserve and expand housing options for all residents.

Actions planned to reduce lead-based paint hazards

Local housing programs refer low-and moderate-income households to the Portland Lead Hazard Control Program for grants to remediate lead-based paint hazards in housing where children under the age of 6 visit or reside. Over the past year, the Lead Hazard Control Grant focused on outreach to single family and multifamily properties in target areas of North and Northeast Portland. This outreach resulted in excellent partnerships with community organizations. For the coming year, the program will continue to nurture these relationships. Also, the program staff will continue to partner with a local housing provider on a large 80 unit building that will be completed in this Action Plan year. This large multifamily property has several rental units. Alongside the multi-family units, in this coming year, the focus will shift to single family homes as well and grants will be provided collaboratively with a local low-income housing provider with a large portfolio of potentially eligible homes. In many housing units when the Lead Team finds issues of home repair and/or code violations, the staff try and assist with complimentary programs that are based on local resources.

Actions planned to reduce the number of poverty-level families

The City of Gresham has historically supported a number of projects that reduce the level of poverty and increase the capacity of families to earn living wages and plans to continue supporting these projects.

Workforce development and training efforts are supported through the Living Solutions program which assists low-income persons to gain job skills and then places those individuals in career-path jobs. Additionally, the City is providing funding for IRCO to partner with Living Solutions to address similar needs in Gresham's immigrant and refugee community and El Programa Hispano Catolico, who provides culturally relevant job training and support services to Gresham's Latinx community. The City is also working with regional partners to improve the transportation system, notably the bus-rapid-transit system (BRT) along Powell and Division and to the employment campuses in northeast Gresham, including Mt. Hood Community College. Construction on the BRT is currently underway and service to select stations began in April 2021.

The City sponsors a program to encourage small businesses by offering incentives for permits and licenses for remodeling and façade improvements for vacant and some occupied business spaces. The Small Business Center actively assists potential businesses in Central Rockwood, the Civic Neighborhood or Downtown. In Spring 2020, the City also launched a Small Business Grant program to provide critical working capital funds to small businesses suffering from financial hardship as a result of the COVID-19 pandemic. As of May 2020, 820 businesses have been assisted to the benefit of both the business and the community.

The City is a partner in the Comprehensive Economic Development Strategy (CEDS) and supports links between industry and education (at the K-12 and higher education levels), supports diversity in the workplace and in industry, and supports activities raising the skills and employability of underrepresented and disadvantaged populations. The Economic Development Traded Sector Jobs Strategy defines the City's vision for targeted job growth and development which relies on existing industry sectors: advanced electronics and specialized machinery and equipment. An integral component is supporting a trained workforce. Part of this development incorporates efforts by WorkSource (WSI) and Mt. Hood Community College which currently offers an industry-supported curriculum in mechatronics (the interface between machines and software).

Actions planned to develop institutional structure

The City of Gresham will hold annual meetings with service providers to assess current community conditions impacting low- and moderate-income households. These discussions include updates on social services accomplishments in working with the population and identification of service gaps or needs in the community.

The City of Gresham is a member of a Regional Fair Housing work group comprised of representatives from the Portland/Vancouver Metro Area that receive federal funding and must deploy that funding in the context of a Fair Housing Assessment and Plan. The jurisdictions and organizations that have chosen to meet are Multnomah County, Clark County, Clackamas County, Washington County, City of Gresham, City of Beaverton, City of Portland, City of Hillsboro, City of Vancouver, State of Oregon and the Fair Housing Council of Oregon. We recognize that many fair housing issues cross jurisdictional boundaries and may require a regional approach. We meet to learn from each other about how best to meet our

federally mandated fair housing planning and implementation.

The City of Gresham continues to strengthen in-house delivery by monitoring subrecipients annually and by increasing staff development through HUD training and regional coordination.

Actions planned to enhance coordination between public and private housing and social service agencies

As noted, the City participates in the Comprehensive Economic Development Strategy (CEDs), as well as in regional transportation planning efforts. Both contain strategies that encompass whole communities and neighborhoods that includes outreach to residents and businesses. Strategies are cross-cutting recognizing that real opportunity is inclusive – housing, transportation, jobs, shopping, services, and recreation. The City will continue to participate in regional strategies. The City of Gresham is a member of the Continuum of Care and will continue to provide input and act on recommendations. Acting independently, and with Multnomah County and the City of Portland, Gresham encourages partnerships across public and private sectors.

The City of Gresham and East Multnomah County have both been instrumental in sponsoring the work of the East County Caring Community, which is a community-wide initiative that links, coordinates, and advocates for housing and social services support for the low- and moderate-income residents of East County. Four area school districts are involved in the effort – Reynolds, Gresham-Barlow, Centennial, and David Douglas.

Discussion

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Gresham receives HOME funding through the Consortium. During the annual application process, Gresham determines which projects qualify and which projects will receive funding for both CDBG and HOME funds. Gresham and Portland enter into an IGA related to HOME funds and the projects Gresham will be funding for that fiscal year.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The

jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter “N/A”.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter “N/A”.

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter “N/A”.

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If

the jurisdiction will not refinance existing debt, enter "N/A."

Discussion

Appendix - Alternate/Local Data Sources