Health, Housing & Human Services
CLACKAMAS COUNTY

Richard Swift
Director

October 13, 2016

Board of County Commissioners
Clackamas County

Members of the Board:

Approval of the Proposed 2017-2021 Assessment of Fair Housing Plan

Purpose/Outcomes	Approval of the proposed 2017 – 2021 Assessment of Fair Housing Plan.
Dollar Amount and Fiscal Impact	600 hours of staff time to prepare and submit plan to HUD.
Funding Source	U.S. Department of Housing and Urban Development No County General Funds are involved.
Duration	Effective July 1, 2017 and terminates on June 30, 2021
Previous Board Action	A Public Hearing to review of the proposed Fair Housing Plan goals and to accept public testimony was held on September 15, 2016.
Strategic Plan Alignment	H3S – Sustainable and affordable housing County - Ensure safe, healthy and secure communities.
Contact Person	Chuck Robbins, Community Development Director - (503) 655-8591
Contract No.	N/A

BACKGROUND:
The Housing and Community Development Division of the Health, Housing and Human Services Department requests the approval of the 2017-2021 Assessment of Fair Housing Plan. As a recipient of Federal Community Development Block Grant, HOME investment Partnerships Program, and Emergency Solutions Grant funds from the U.S. Department of Housing and Urban Development (HUD) the County is required to comply with Federal Fair Housing Regulations. The Housing and Community Development Division (HCD) and the Housing Authority of Clackamas County (HACC) have completed the data analysis and extensive collaboration process to develop the 2017 – 2021 Assessment of Fair Housing Plan (AFH).

The completed AFH must be submitted to HUD for review 270 days prior to the start of the fiscal year which begins the 5-Year Consolidated Planning cycle. Approval of the AFH is required before HUD will release any of the federal funds covered by the Consolidated Plan.

The AFH has the following goals in priority order:

1. Develop new housing units with long-term affordability for a broad range of low-income households with an emphasis on dispersal of affordable housing.
2. Increase accessibility to affordable housing for persons with disabilities and single parent familial status households.

3. Improve access to housing and services for all protected classes.
4. Enforce Fair Housing laws and Increase public understanding of Fair Housing laws.
5. Coordinate Fair Housing Advocacy and Enforcement efforts among regional partners
6. Ensure that all housing in Clackamas County is healthy and habitable.

The proposed AFH was available to the public for review and comment for 45 days from August 22 through October 10, 2016. All comments have been accepted and included in the AFH.

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

1) Place approval of the 2017 – 2021 Assessment of Fair Housing Plan (AFH) on the Board of County Commissioners' consent agenda for adoption at the October 13, 2016 meeting.
2) Authorize the Director of the Housing and Community Development Division, Chuck Robbins to sign on behalf of Clackamas County all documents necessary for submitting, amending and reporting on the Assessment of Fair Housing Plan.

Respectfully submitted,

Richard Swift, Director
Health, Housing & Human Services

Attachments:

- Proposed 2017-2021 Assessment of Fair Housing Plan
- Appendices A, B, C and D.
- AFH Executive Summary

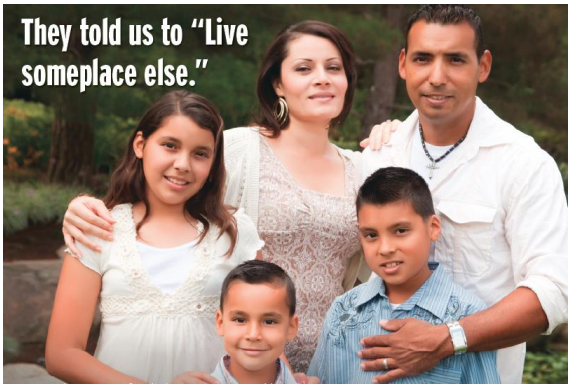
Clackamas County

2017 – 2021 Assessment of Fair Housing Report

Housing Authority of Clackamas County and

Housing and Community Development Division

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



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

Health, Housing
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CLACKAMAS COUNTY

Assessment of Fair Housing Tool

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I. Cover Sheet

1. Submission date: **10/14/2016**
2. Submitter name: **Clackamas County Housing and Community Development Division**
3. Type of submission: **Joint Submission**
4. Type of program participant(s): **Consolidated plan participant and PHA**
5. For PHAs, Jurisdiction in which the program participant is located: **Clackamas County, Oregon**
6. Submitter members (if applicable): NA
7. Sole or lead submitter contact information:
   a. Name: **Mark Sirois, MPA**
   b. Title: **Project Coordinator**
   c. Department: **Health, Housing and Human Services Department, Housing and Community Development Division**
   d. Street address: **2051 Kaen Road #245**
   e. City: **Oregon City**
   f. State: **Oregon**
   g. Zip code: **97045**
8. Period covered by this assessment: **July 1, 2017 to June 30, 2021**
9. Initial, amended, or renewal AFH: **Initial AFH**
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

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

    _____
    (Signature) (date)

    _____
    (Signature) (date)

12. Departmental acceptance or non-acceptance:

_____

(Signature) (date)

II. Executive Summary

The Fair Housing Act was enacted in 1968. Recent changes to the Affirmatively Furthering Fair Housing Rule 24 CFR 5.150-5.180 were finalized by HUD on July 8, 2015. The 2016 Assessment of Fair Housing (AFH) in Clackamas County relied on census data provided by the U.S. Department of Housing and Urban Development (HUD), local information and community feedback through surveys and public meetings. The AFH was conducted jointly by the Housing Authority of Clackamas County and the Housing and Community Development Division.

HUD's newly developed AFH process has four nation-wide fair housing goals:

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

The community participation process for selecting Clackamas County's fair housing goals included 10 public meetings, three separate surveys during April, May and June and consultations with 23 community agencies. A total of 310 people responded to a community survey, a public housing resident survey and a Spanish language survey. Some surveys were mailed to groups and all surveys were available on paper and online. A public notice was published in community newspapers notifying interested persons that a draft of the AFH document, AFH Goals and an executive summary was posted for a 30-day comment period that was extended to 45 days. The public notice also included an invitation to attend a public hearing on September 15th to provide testimony on the proposed AFH goals.

Community meeting discussions in April and May included a review of past fair housing goals, a review of some of the 2010 census data demographics provided by HUD, a comparison of county data to regional housing data and, a review of maps of the county areas that have high concentrations of minorities and concentrations low income households.

Contributing factors to the fair housing conditions were identified after a review of HUD data, comments during public meetings, community survey data and local housing data. Representatives of the Legal Aid Services of Oregon, the Fair Housing Council of Oregon, the Housing Authority of Clackamas County, the Social Services Division and the Housing and Community Development Division formed a work group to results of surveys, community meetings and HUD provided data to select the contributing factors listed below:

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

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

The Contributing Factors listed above are similar to the fair housing choice impediments identified in 2012 which are listed here:

1. Violations of fair housing laws in renting and purchasing property
2. Lack of knowledge of fair housing laws, including confusion about ADA and fair housing laws
3. Patterns of disadvantage for minorities and other protected classes – location, income, education
4. Lack of suitable affordable (including subsidized) housing in general, and lack of choice by quality, accessibility, location, type of units and access to opportunities
5. Land use and other public policies may be barriers to developing affordable housing

The process of analysis to select the 2017-2021 AFH Goals for the jurisdiction was a series of meetings and discussions by the work group. Workgroup members reviewed past fair housing efforts, clarified the contributing factors in the jurisdiction and in the Portland metro region and discussed the HUD provided census maps and data. After review of the available data and discussion of what data was not available, work group members agreed to the following goals in priority order:

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

6. Ensure that all housing in Clackamas County is healthy and habitable.

These AFH goals will become part of planning and performance reporting documents for the Housing Authority and the Housing and Community Development Division for the 2017 through 2021 program years. These AFH goals are similar to fair housing goals selected in 2012 listed here:

Goal I: Fair housing laws are enforced
Goal II: People and agencies/institutions know about fair housing
Goal III: Integrative patterns are promoted
Goal IV: Fair housing is attained regionally
Goal V: All rental housing is habitable
Goal VI: Actions are guided by local and regional data

Since 2012 the significant changes that have impacted Clackamas County include a sharp increase in housing demand due to the number of new residents moving to the Portland metro area including Clackamas County. Another significant change has occurred in in fair housing enforcement at the Oregon State Bureau of Labor and Industry (BOLI). BOLI legislative changes to the state law made Oregon state fair housing laws no longer substantially equivalent to federal fair housing laws. As a result HUD terminated its contract/partnership with BOLI as of April 3, 2016. This means that now all federal claims of fair housing violations will have to be filed directly with HUD. HUD has limited capacity to handle the additional workload. Fair Housing advocates are anticipating a backlog of complaints to be filed and investigated.

The 45-day public comment period on the draft AFH and AFH goals ended on October 10, 2016. Only two comments were submitted and both were accepted. Legal Aid Services of Oregon provided public testimony at the September 15th public hearing in favor of the AFH process and the AFH Goals. Housing Land Advocates (www.housingLandAdvocates.org) provided written testimony expressing concern on the lack of housing opportunities for Hispanic households due to land use and zoning policies in some communities that have limited multifamily housing projects.

III. Community Participation Process

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

The Assessment of Fair Housing survey in English and Spanish was developed in March 2016 by Housing and Community Development (HCD) staff with input from the local HUD field office. The Community AFH online survey was open for 12 weeks from April 7 to June 30, 2016.

AFH Outreach was conducted to every County household through a fair housing article with English and Spanish explanation in the Citizen News distributed in April 2016. The article was in English and Spanish directing readers to the Housing and Community Development (HCD) website and a link to the survey. Citizen News is a quarterly newspaper-style publication that covers the news, events and issues in which Clackamas County is involved. Citizen News is distributed to 178,000 households in Clackamas County and is found online at www.Clackamas.us.

Housing Authority staff also developed a survey and distributed notices to all public housing residents and households with Housing Choice Vouchers (Section 8). HCD staff also contacted numerous community organizations (listed below) to solicit survey input and offer to meet with community groups.

The HACC Resident Advisory Board was provided a presentation of the AFH process and data on May 11, 2016 and encouraged to complete the Fair Housing surveys. The HACC Resident Advisory Board was also provided an AFH Executive Summary and provided an opportunity to comment on the AFH goals on Tuesday September 20th.

A Notice of Comment Period and a Notice of Public Hearing was published on August 17 and 18, 2016 in the newspapers of record. The combined notice provided the website address and the date of the Public Hearing as September 15, 2016. Email notices were sent to the Citizen Participation list and the homeless Continuum of Care list on August 24th. An additional Notice was published in newspapers of record to extend the comment period to 45-days with a new closing date of October 10th. The Draft AFH Plan was posted on the Community Development website on August 22, 2016.

A draft of the AFH was posted to the Housing Authority of Clackamas County website on September 15th and all residents were notified that the AFH draft plan had been posted on the same date.

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

HCD staff sent email solicitations to participate in the survey to the 75 member Citizen Participation list, the 100 member Continuum of Care list, the Housing Authority of Clackamas County residents, and to county and community Hispanic outreach workers. Paper surveys with postage paid return envelopes were also provided to Todos Juntos, Sandy Community Action, the Clackamas Service Center, National Alliance for Mental Illness (NAMI), and the Disability Resource Advisory Council.

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

Groups contacted include:

- Adventist Health
- Aging and Disability Resource Center (ARDC)
- Antfarm
- Folktime
- Wichita Family Resources Center
- Housing Authority of Clackamas County
- Continuum of Care
- Clackamas Service Center
- The Canby Center
- The City of Canby
- Clackamas Womens Services
- National Alliance for Mental Illness (NAMI)
- Oregon Department of Human Services
- Office of Children and Families (Hispanic outreach coordinator)
- North Clackamas School District
- Familias en Accion (Families in Action)
- Todos Juntos
- Casa Verde farmer worker housing in Canby
- Disability Services Advisory Council (DSAC)
- Sandy Helping Hands
- Sandy Community Action Center
- Oregon Food Bank
- OHSPP Oregon Head Start

Outreach to Housing Authority of Clackamas County public housing residents and Housing Choice Voucher households included a survey specific to public housing residents and a meeting with the Resident Advisory Board. 133 public housing residents responded to the PHA survey.

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

The AFH Community Survey resulted in 171 responses with the largest resident groups being living in Oregon City (17.5%), 17% living in Milwaukie area, 17% living outside of Clackamas County and 8.2% living in the unincorporated Clackamas area between Milwaukie and Happy Valley. The respondent households were 39.2% 2 person

households, 20% were in 1 person households, 17% had 3 persons in their households and 12.3% had 4 persons.

The Household income for 48% of respondents was below $50,000 per year, 36.4% made less than 30,000 per year and 22.8% made less than $15,000 per year. The racial makeup of respondents was 82.4% white, 3% Black, 2.4% Alaska Native/American Indian, 4.8% were more than 1 race and 5.5% identified as "Other". 13.9% of respondents were Hispanic, 23.9% had a disabled household member and Female head of households were 44.6% of respondents.

The Housing Authority of Clackamas County (HACC) also conducted an online PHA survey and distributed paper surveys between 5/1/16 and 6/30/16. The PHA survey was sent to all Public Housing Residents, Scattered site residents and Housing Choice Vouchers which resulted in 133 responses. Most respondents lived in Milwaukie (32.8%), Clackamas (12.2%), Oregon City (19.85%) and 10.7% lived outside of Clackamas County. 64% of the household family size was 1 or 2 people. 13.7% had 3 people in the households, 12.21% had 4 people. 9% of respondents had 5-7 people in their household. The family income for 86 households was less than $15,000 per year (65.6% of respondents). 36 households earned $15,000 to $29,000 per year (27.48%) and 7 households made 30 to 49,999 per year (5.34%).

The PHA survey respondent racial makeup was 81.6% white, 3.82% Black, 2.29% Asian, 1.53% Alaska Native/American Indian and, 9% listed their race as "more than 1" or other. 13.85% of respondents were Hispanic, 56.15% of households had a disabled family member and 81.68% were female-headed households.

10 Meetings attended in April and May:

April 7 – Sandy Connect Luncheon – 25 people
April 13 – HACC (PHA) Staff meeting – 30 people
April 21 – Clackamas Service Center – 12 people
May 10 – Adult Protective Services – 10 people
May 11 – HACC (PHA) Resident Advisory Board – 20 people
May 17 – Disability Services Advisory Council – 12 members
May 19 – Casa Verde community meeting in Canby, Oregon – 10 people
May 25 – Continuum of Care presentation – 40 members
May 26 – Information and Referral meeting presentation – 30 people
September 15 – Public Hearing

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

Most people participating in community meetings wanted to know how to access more affordable housing. Attendees at Fair Housing presentations commented on the

increasing demand for housing units and the overall lack of housing options for low-income and vulnerable populations. Most comments also encouraged the jurisdiction/County to build more affordable housing and more accessible housing.

Hispanic residents at Casa Verde in Canby which is located in an area of "High Concentration of ethnicity and low-income" households expressed satisfaction with their community and housing. Attendees stated that they had moved to the community for work and liked the safety of the community. Attendees said that their children were having success in school and wanted more community parks and activities for children.

Continuum of Care members commented that veterans should be included in any planning for new housing projects. Social services agency staff mentioned that many persons in affordable housing including Hispanic populations do not want to file complaints because they fear losing their housing.

During the May 11th meeting, Public Housing Resident Advisory Board (RAB) members expressed their desire for housing that is closer to services and good school services. Residents living in Oregon City expressed that more school services were available to them when they lived in a larger school district.

Providing an effective referral system for victims of housing discrimination or Fair Housing violations was the top ranked change requested by respondents of the Community AFH survey. Reducing discrimination in renting and/or purchasing a home was the second highest ranked suggested change. Reducing barriers to Fair Housing Choice due to zoning, land use ordinances, and other public policies was the third highest priority suggestion. Reducing concentrations of minorities and poverty by providing greater access to affordable housing for lower income persons, minorities throughout the County was 4th most important priority selected by respondents. Providing greater housing options by increasing the number, quality and location of housing that is affordable to low and very-low income households was the 5th most important change suggested.

Although the Spanish language survey had only 6 participants, comments included suggestions to build affordable housing throughout the county not just in low income neighborhoods.

The 45-day public comment period on the draft AFH and AFH goals ended on October 10, 2016. Only two comments were submitted and both were accepted. Legal Aid Services of Oregon provided public testimony at the September 15th public hearing in favor of the AFH process and the AFH Goals. Housing Land Advocates (www.housingLandAdvocates.org) provided written testimony expressing concern on the lack of housing opportunities for Hispanic households due to land use and zoning policies in some communities that have limited multifamily housing projects.

IV. Assessment of Past Goals, Actions and Strategies

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

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

Clackamas County's 2012 Analysis of Impediments (AI) to Fair Housing Choice identified five broad impediment areas. The impediment areas were identified based on analysis of existing data and broad public input. The impediment areas are also consistent with conclusions about areas of impediments to fair housing choice drawn in the Clackamas County 2005 AI and those identified in neighboring counties and cities.

The 2012 AI impediments and identification of goals reflect the complexity and the benefit of a regional approach to solutions.

6. Violations of fair housing laws in renting and purchasing property
7. Lack of knowledge of fair housing laws, including confusion about ADA and fair housing laws
8. Patterns of disadvantage for minorities and other protected classes – location, income, education
9. Lack of suitable affordable (including subsidized) housing in general, and lack of choice by quality, accessibility, location, type of units and access to opportunities
10. Land use and other public policies may be barriers to developing affordable housing

The Housing and Community Development Division (HCD) assembled a Fair Housing Partners group to identify goals and strategies to improve housing choices. HCD's Fair Housing local partners include; the cities, towns and hamlets in Clackamas County, Clackamas County Social Services Division (SSD), Housing Authority of Clackamas County (HACC), Clackamas County Department of Transportation and Development (DTD), the Fair Housing Council of Oregon (FHCO) and, Legal Aid Services of Oregon (LASO).

Six (6) fair housing goals were identified in preparation of the 2012 AI plan:

Goal I: Fair housing laws are enforced
Goal II: People and agencies/institutions know about fair housing
Goal III: Integrative patterns are promoted
Goal IV: Fair housing is attained regionally
Goal V: All rental housing is habitable
Goal VI: Actions are guided by local and regional data

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

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

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

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

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

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

This program has been effective in achieving Goals I and II of the 2012 Analysis of Impediments.

Integrative Patterns are promoted (Goal III)

Since 2012 some progress has been made with local governments/communities regarding the need for a range of housing options for persons and families with a range of income levels, however, this goal has not yet been achieved. The County Housing and Community Development Division (HCD) has limited staffing and resources to promote integrative housing patterns in the 16 cities and towns in the jurisdiction. The County will continue to work with partners to explain the need for a range of housing options particularly for elderly and disabled persons living on fixed incomes.

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

All rental housing is habitable (Goal V)

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

The potentially harmful unintended consequences for not attaining this goal has been the possibility of low-income and vulnerable populations living in substandard or unhealthy housing due to lack of housing availability and lack of resources to address rental unit habitability issues. This goal has been re-examined and added to the next 5 year plan.

REGIONAL EFFORTS (Goals 4 and 6)

Clackamas County meets quarterly with regional partners to coordinate fair housing efforts, data collection, training and events. Regional partners include: Multnomah County, Washington County, Clark County (WA), City of Portland, City of Gresham, and the City of Beaverton.

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

Some of the strategies suggested in the Clackamas County 2012 AI such as coordinating fair housing education and training efforts have been adopted by the Regional Fair Housing Partners group.

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

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

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

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

Some of the strategies suggested in the Clackamas County 2012 AI such as coordinating fair housing education and training efforts have been adopted by the Regional Fair Housing Partners group. Clackamas County will continue to coordinate with state and regional partners to strengthen fair housing education and enforcement efforts. The Fair Housing Council of Oregon (FHCO) will continue as a key organization in our regional fair housing education and enforcement efforts.

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

The Clackamas County jurisdiction has a continued need for fair housing information and training for tenants and landlords as the tenants and landlords transition in an out of residential properties. The jurisdiction and regional partners acknowledge that the Portland metro area is one housing market and that our efforts must be coordinated in order to be effective. Our regional fair housing organization is the Fair Housing Council of Oregon (FHCO). The organization continues to expand and improve on its training and services. A recent Oregon state law now forbidding discrimination by income source (Section 8) has provided a new opportunity for FHCO to promote fair housing and educate the area landlords and property managers.

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

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

The jurisdiction will also continue to work with regional partners to provide coordinated training and enforcement of fair housing laws. Regional partners will continue to support the Fair Housing Council of Oregon to collect and report on housing discrimination issues as well as conduct fair housing testing.

V. Fair Housing Analysis

A. Demographic Summary

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

A review of HUD Table 1 data indicates that Clackamas County's population demographics compared to the Portland metro region represented in the HUD Tables as the Census Bureau Statistical Area (CBSA) reveals that in 2010 Clackamas County was 8% more white than the region, about 3% less Hispanic, 2% less Black, 4% less foreign born and 2.7% less LEP than the Portland metro region.

As shown in Table 2, the population of less than 300,000 people in Clackamas County in 1990 was 95% White, less than 1% Black, 2.5% were Hispanic, 4% were foreign born and less than 2% were of Limited English Proficiency (LEP). About 62% of the 1990 population was between the ages of 18 and 64. The Portland metro region in 1990 was just over 1.5 million people 90% of which were white, 3.3% were Hispanic, 2.6% Black, 5.8% were foreign born and 3% were LEP. In 1990, Clackamas County's population was more white by 5%, with fewer foreign born (1.8% less) and fewer LEP (1% less) than the Portland metro region.

The 2010 census results show that in twenty years, Clackamas County has increased the overall population by 65,000 people. The County has become less white (85%), more Hispanic (from 2% to 7.7%), the percentage of foreign born persons has double from 4.1% to 8.4% and the percentage of LEP persons has more than doubled from 1.8% to 4.5%. The Black population has remained below 1% of Clackamas County since 1990. During the same 20-year period the Portland metro region has seen a population increase of 630,000 to a total of over 2.1 million people. The white population in the Portland metro region decreased from 90% to 76% while the Black population remained at 2.7%. The Portland CBSA regional Hispanic population increased by just under 200,000 people from 3.3% to 10.8% of the population. The foreign born population increased from 5.8% to 12.6% and the LEP population increased to over 160,000 people from 3% to 7.2% of the population in the Portland CBSA region.

Persons with disabilities are represented proportionally in Clackamas County in comparison to the Portland CBSA according to HUD Table 1. Persons with hearing difficulties are 4% of the County while represented regionally at 3.69%. Persons with vision difficulties are 1.6% of the County while regionally the percentage is 1.99. Persons with cognitive difficulty are 4.6% of the County while the region has 5.27% with cognitive difficulty. Persons with ambulatory difficulty in the County are 6.1% of the population while 5.99% of the region has ambulatory difficulty. Persons with self-care difficulty are 2.56% of the County and 2.47% of the region. Persons with independent living difficulty are 4.1% of the County and 4.35% of the region. The examination of the HUD Table 1 by disability type reveals that there is no significant difference between the County and the Portland CBSA region by any particular disability type.

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

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

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

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

A review of single and multi-family housing building permits from January 2006 to June 2016 reveals that 3,435 permits were issued for single family homes throughout the jurisdiction while 220 permits were issued for multi-family homes of duplexes, 3 or 4 family unit developments and developments with 5 or more units. 47.7% of the multi-family permits (105 permits) were issued in the Clackamas zip code which is an area South of Happy Valley, east of Hwy 205 and north of the Clackamas River. 11.4% of multi-family permits (25 permits) were issued in Molalla and another 11.4% (25 permits) were issued in Milwaukie.

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

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

B. General Issues

i. Segregation/Integration

1. Analysis

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

Table 3 Racial/Ethnic Dissimilarity Trends demonstrates that the segregation levels for all races and ethnicities in Clackamas County have remained low over the 20-year period between 1990 and 2010. Any dissimilarity level that is below 40 represents a low level of segregation. Dissimilarity levels between 40 and 54 represent a moderate level of segregation and levels over 55 indicate a high level of segregation. The highest level of segregation is between Asian or Pacific Islanders and Whites at 39.65. The second highest level of segregation is between Blacks and Whites at 35.35. The third highest level of segregation is between Hispanic and Whites at 31.03.

In the Portland metro region the Black population had a high level of segregation at 63.52 in 1990. All other races and ethnicities in the Portland metro region had low levels of segregation in 1990. Dissimilarity trends between 1990 and 2010 on Table 3 indicate that the segregation in Clackamas County has remained low for all ethnicities and races at levels less than 40. The highest level of segregation in 1990 was between Blacks and Whites at 29.56. This level of segregation has increased to 35.35 but has been surpassed by the segregation level between Asians or pacific Islanders and whites with a level of 39.65.

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

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

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

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

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

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

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

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

The Clackamas County jurisdiction has had low segregation levels since 1990 as indicated in HUD Table 3 and continues to have segregation levels that are considered low by the Table 3 Racial/Ethnic Dissimilarity Trends index.

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

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

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

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

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

2. Additional Information

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

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

The jurisdiction's Asian population is the most segregated based on HUD Table 3 with the Low Segregation rate of 39.65 (almost in the Moderate Segregation range of 40 to 54). It may be that the jurisdiction has a city that is attracting Asian home buyers. Census data examination of the City of Happy Valley has a total 2010 population estimate of 14,252 and a 2015 estimate of 18,493 people or a 29.8% increase. The Happy Valley median household income (in 2014 dollars), 2010-2014 is $100,438 which is well above the jurisdiction's area median income of $73,500.

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

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

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

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

The jurisdiction has no place based investments and mobility options for specific protected class groups other than for persons who live in public housing or have a Housing Choice Voucher who are trying to move. The jurisdiction does have the Clackamas County Development Agency that oversees 4 urban renewal areas in un-incorporated Clackamas County. The urban renewal area plans are designed to increase jobs, improve economic vitality and, improve opportunities for development and re-development. The 4 urban renewal areas are Government Camp, the Clackamas Industrial Area, the Clackamas Town Center Area and the North Clackamas Renewal Area. The Clackamas Town Center Area and the North Clackamas Renewal Area are located either within or adjacent to areas that are identified as ""High Concentrations" of ethnicity and low-mod income households.

3. Contributing Factors of Segregation

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

- Community Opposition
- **Displacement of residents due to economic pressures**

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

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

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

ii. <u>R/ECAPs</u>

1. Analysis

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

HUD data including Maps 1, 3, 4 and Table 4 for this AFH analysis has not identified any HUD-defined RE/CAP areas in the Clackamas County jurisdiction.

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

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

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

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

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

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

HUD Maps 1, 3, 4 and Table 4 indicate that Clackamas County has no HUD identified R/ECAP areas. In the region, 10,587 households live in RE/CAP areas. HUD Table 4 regional data reveals that Hispanic households are 53.64% of all households in regional RE/CAP areas, white-non-Hispanic households are 34.83%, Asian or Pacific Islander households are 4.36%, Black households are 3.69% and Native American and Other, Non-Hispanic households are less than 1%. In comparison with the jurisdiction of Clackamas County "High Concentration" areas, 70.30% are white, non-Hispanic households, 21.40% are Hispanic households and all others are less than 3% of the total "High Concentrations" households.

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

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

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

Clackamas County jurisdiction has had no HUD identified R/ECAPs in the past and has no R/ECAPs based on current HUD data.

2. Additional Information

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

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

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

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

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

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

A group of local business leaders, government officials and community members, the Clackamas Regional Center Working Group, was asked by the Board of County Commissioners to evaluate potential projects in the district and recommend which projects to implement. The Working Group developed a work program that prioritized projects and

presented it to the Commission for consideration including several transportation infrastructure projects to improve economic development and employment opportunities for area residents.

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

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

3. Contributing Factors of R/ECAPs

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

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

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

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

The City of Portland's plan has 7 action areas:

1. End Discrimination in Rental Housing
2. Create a Fair Housing Advocacy Committee
3. Strengthen Public Awareness of Fair Housing Laws
4. Improve Access to Housing Opportunity
5. Expand Fair Housing testing
6. Expand the Supply of Accessible, Affordable Homes
7. Mitigate the unintended Consequences of Gentrification.

iii. <u>Disparities in Access to Opportunity</u>

1. Analysis

a. Educational Opportunities

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

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

School proficiency measurements are based on test scores of 4th grade students. A review of HUD Table 12 reveals that the Clackamas County total population school proficiency index has all races above 55 with a high of 68.03 for Asian or Pacific Islanders and the Hispanic index at 55.62. Regionally the highest proficiency indicator is 52.61 for Asian or pacific Islanders with a low of 36.19 for the Black population and the Hispanic index at 40.13. All races have higher proficiency in Clackamas County than in the region.

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

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

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

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

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

b. Employment Opportunities

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

The Labor Market Engagement Index provides a measure of the unemployment rate, labor force participation rate and the percent of the population age 25 and above with at least a bachelor's degree, by neighborhood. The Labor Market Index in Table 12 for the total population demonstrates slightly better labor market engagement in the jurisdiction than in the region for all protected classes but not for white households. Black households have a jurisdictional index of 55.73 while in the region the index is 54.33. Hispanic households have a jurisdictional index of 49.99 while the regional index is 47.74. Asian or Pacific Islander households have a jurisdictional index of 66.21 and a regional index of 61.12. Native American, non-Hispanic households have a jurisdictional index of 50.62 and a regional index of 48.94. White, non-Hispanic households have a jurisdictional Labor Market Index of 55.61 and a regional index of 57.05.

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

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

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

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

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

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

The Table 12 Jobs Proximity Index jurisdictional scores reveal that in the total population, white, non-Hispanic persons have the lowest job proximity index of 48.74. Asian or Pacific Islander persons have the next lowest index of 48.99. Regionally, the job proximity index for white, non-Hispanic persons is lower at 47.93 and for Asian Pacific Islander persons the index is 45.61. Based on the Table 12 Jobs Proximity Index scores, it appears that all protected classes are able to access jobs at a higher rate in the jurisdiction than in the region, except for Asian or Pacific Islanders who score 48.99 in the jurisdiction but only 45.61 in the region. Interestingly, Asian or Pacific Islanders living below the federal poverty line have greater proximity to jobs regionally at 54.09 than the same class in the region at only 46.53. The opposite appears to be true for the Native American, non-Hispanic below poverty population that scores 52.10 on a regional basis but only 48.73 in the jurisdiction. It appears that the Native American population living below the poverty level score about the same as white, non-Hispanic in the total population of the jurisdiction at 48.74.

c. Transportation Opportunities

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The jurisdiction's Clackamas County Social Services Division operates several transportation programs, and, through a partnership called the Clackamas County

Transportation Consortium, provides coordination and funding for transportation needs at the ten senior and community centers operating in Clackamas County.

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

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

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

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

d. Low Poverty Exposure Opportunities

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

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

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

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

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

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

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

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

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

e. Environmentally Healthy Neighborhood Opportunities

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

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

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

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

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

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

f. Patterns in Disparities in Access to Opportunity

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

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

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

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

2. Additional Information

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

The Clackamas County jurisdiction has identified "Transportation Disadvantaged Populations" in the process of developing a Transportation System Plan Update 2035. One of the Transportation System Plan Update objectives was to identify existing gaps and deficiencies in the transportation system including missing connections in sidewalks, bicycle paths, roadway conditions and densely populated areas without transit service. Goal 5 of the Transportation System Plan Update is to provide an equitable transportation system.

Regionally, the Healthy Columbia Willamette Collaborative is a large public private collaborative comprised of 15 hospitals, four local public health departments, and two Coordinated Care Organizations in Clackamas, Multnomah, and Washington counties in Oregon and Clark County, Washington. It is one of the most complex collaborations in the country convened to conduct a community health needs assessment. It includes four counties in two states; three sectors--hospitals, public health departments, and Medicaid payers; large hospital systems and community hospitals; and urban and rural populations.

A regional community health needs assessment that was conducted in Summer 2013 informed by the following sources across Clark County, Washington, and Clackamas, Multnomah, and Washington counties in Oregon: 38,000 participants in community engagement projects conducted since 2009; 202 community members participating in 14 community listening sessions; 126 interviews and surveys with community health stakeholders; and more than 100 population-health indicators in each of the four counties. The second community health needs assessment will be completed in July 2016. This assessment will include the health indicators involved in the first assessment and will be expanded to examine social determinants of health, as well as hospital and Coordinated Care Organization data. Community engagement activities will be expanded to include a community survey in addition to community listening sessions and stakeholder interviews. Website: https://multco.us/healthy-columbia-willamette-collaborative/reports

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

The Clackamas County jurisdiction has identified "Transportation Disadvantaged Populations" in the process of developing a Transportation System Plan Update 2035. Transportation Disadvantaged Populations are defined as "groups of people who have historically had unmet transportation needs or have experienced disproportionate negative impacts from the transportation system such as the elderly, youth, low income, and low vehicle ownership populations, and those living within 500 feet of a freeway or highway."

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

3. Contributing Factors of Disparities in Access to Opportunity

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

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

The only Contributing Factors of Disparities in Access to Opportunity for protected classes may be the general lack of affordable housing for low income households in the jurisdiction and in the region. The Lack of Regional Cooperation on affordable

housing and the Land Use Zoning laws may be the contributing factor to the lack of affordable housing options thereby limiting access to opportunity. The rapid increase in housing demand in the private housing market will continue to gentrify some low income neighborhoods and push low-income families further from high opportunity areas.

A recent regional Metro Housing Equity 2016 Report detailed the lack of affordable housing units referenced as "missing middle" housing units. "There are currently approximately 30,000 income-restricted units of housing regulated to remain affordable to households making less than 60 percent of median income, and approximately 73,000 units of market-rate housing that are affordable at this level (although rising rents will cause this number to diminish) in the four-county metro region. With over 185,000 households making less than 60 percent of median income, that leaves a shortage of more than 80,000 units of affordable housing." *Metro Opportunities and challenges for equitable housing, January 2016* website: **oregonmetro.gov/equitablehousing.**

All these requirements of multifamily housing projects increase the initial cost and result in affordable housing that is expensive to build and maintain. The State of Oregon has a land use plan (Goal 10) that requires all communities to allocate land for multifamily developments however some communities are more compliant than others. State and regional housing advocates are beginning to challenge communities to meet the Goal 10 requirements to provide land for multi-family housing developments. In 2015 Housing Land Advocates joined the Coalition for Affordable and Safe Housing to repeal Oregon's ban on inclusionary zoning, and allow Oregon communities access to this important tool for creating affordable housing in areas of opportunity. The ban was lifted in 2016 with the passage of HB1533 which became effective June 2, 2016.

iv. <u>Disproportionate Housing Needs</u>

1. Analysis

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

An initial review of HUD Table 9 data when compared to similar data for neighboring jurisdictions of similar size and composition indicated that data for the Clackamas County jurisdiction was inaccurate or extremely low. HUD has since provided a revised HUD Table 9. The following analysis is based on the revised HUD Table 9 as of 9/21/16 and attached to this analysis.

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

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

Disproportionate Housing needs in the jurisdiction by household type and size are highest for family households with children (5+ people) at 51.28% or 7,020 of a total of 13,689 total households in this category. The second highest rate is for non-family households at 46.76%. Family households with less than 5 people had the lowest rate of 33.13% of households experiencing housing problems from a total of 87,884 households in this category.

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

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

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

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas,

or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

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

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

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

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

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

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

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

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

The jurisdiction has no current data on the rates of renter and owner occupied housing by race/ethnicity. The U.S. Census Bureau Quickfacts website has an Owner occupied (2010-

2014) housing unit rate of 68.5% for Clackamas County. The remainder of the households 31.5% (100%-68.5 = 31.5%) could be considered renter occupied households unless those households are living in institutions or elsewhere. According to HUD Table 5 there were a total of 157,887 housing units in the jurisdiction in 2010. 31.5% of the 157,887 housing units equals 49,734 housing units occupied by renters.

2. Additional Information

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

The State of Oregon Housing and Community Services (OHCS) published a housing needs Assessment in 2013 using various sources of data including American Community Survey data. The OHCS Housing Needs for Clackamas County identified that 44 housing units were needed for persons in need of drug and alcohol rehabilitation, 169 units were needed for persons who are chronically mentally ill, 85 units were needed for persons who have a developmental disability, 78 units for persons who are physically disabled, 891 units were needed for elderly persons, 248 units were needed for frail elderly persons, 8 units were needed for persons with HIV/AIDS and, 143 units were needed for farm workers. Source: www.oregon.gov/**OHCS/ISD/RA/**housing-profiles/counties/Clackamas

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

The PHA housing needs analysis is based on the Housing Authority of Clackamas County (HACC) public housing Waiting List data from the 2015 Annual Plan. 4,109 Households requested Housing Choice Vouchers and Public Housing. 86% of households (3,528 households) were extremely low income households with incomes of less than 30% of the Area Median Income. 28% of households on the wait list had a disabled family member. 28% of households on the wait list (754 households) were requesting a one-bedroom unit, 21% requested a two-bedroom unit, 862 households or 32% requested a three bedroom unit and, 20% requested a unit with at least 4 bed-rooms.

3. Contributing Factors of Disproportionate Housing Needs

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

- **The availability of affordable units in a range of sizes**
- **Displacement of residents due to economic pressures**
- Lack of private investments in specific neighborhoods

- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending Discrimination
- Other

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

A recent regional Metro Housing Equity 2016 Report detailed the lack of affordable housing units referenced as "missing middle" housing units. "There are currently approximately 30,000 income-restricted units of housing regulated to remain affordable to households making less than 60 percent of median income, and approximately 73,000 units of market-rate housing that are affordable at this level (although rising rents will cause this number to diminish) in the four-county metro region. With over 185,000 households making less than 60 percent of median income, that leaves a shortage of more than 80,000 units of affordable housing." *Metro Opportunities and challenges for equitable housing, January 2016* website: **oregonmetro.gov/equitablehousing.**

C. <u>Publicly Supported Housing Analysis</u>

1. Analysis

a. Publicly Supported Housing Demographics

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

A review of 2010 Census HUD Table 6 data indicated that the Black population residing in Public Housing (4.43%) and using the Housing Choice Voucher (3.71%) program at more than 4 times the Black percentage of the general population (0.74%). The Black population appears to be over represented in Public Housing and in the HCV programs yet under-represented in the Project Based Section 8 program (0.30%) and the Other Multifamily Programs (0.0%).

The Hispanic population in Public Housing (5.78%), Project-Based Section 8 (4.14%) and the HCV program (4.76%) is at least 2% below the current Hispanic population in the jurisdiction (7.73%). The Other Multifamily publicly supported housing has less

than 1% Hispanic participation. The Hispanic population appears to be under-represented in Publicly Supported Housing however this may be due to the rapid growth of this population from 2.54% in 1990 to 7.73% in 2010.

The Asian population in Clackamas County was 3.84% of the general population. Public Housing units are occupied by 1.16% Asians, Project-Based Section 8 have 2.66% and Other Multifamily and HCV program were less than 1% (0.96 and 0.63) Asian. This data reflects that the Asian population is underrepresented in Publicly Supported Housing.

Table 7 has no data on R/ECAP areas since no R/ECAPS have been identified in Clackamas County.

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

As stated above, the Black population appears to be over represented in Public Housing and in the HCV programs yet under-represented in the Project Based Section 8 program (0.30%) and the Other Multifamily Programs (0.0%). Table 6 has no income data in regarding the Black population.

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

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

b. Publicly Supported Housing Location and Occupancy

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

Clackamas County has no HUD identified R/ECAP areas and low segregation according to HUD Table 3. Maps 5 and 6 indicate that publicly supported housing in all categories is distributed throughout the populated areas of the county.

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

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

Clackamas County has no HUD identified R/ECAP areas and low segregation according to Table 3. Maps 5 and 6 indicate that publicly supported housing in all categories is distributed throughout the populated areas of the county jurisdiction and the region. The communities of Lake Oswego, West Linn and Happy Valley have been difficult for public housing residents to move to build affordable housing units in due to some community opposition to affordable housing. Another factor affecting the difficulty of moving to these communities has been the higher rent levels than other areas according to some the Public Housing residents, Section 8 voucher holders and affordable housing developers. However, Section 8 Housing Choice Voucher are currently renting units in these communities.

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

Table 7 has no data on R/ECAP areas since no R/ECAPS have been identified in Clackamas County.

Table 7 data on Non R/ECAP area Demographics indicates that all the data is equal to the data of the publically supported housing since no areas of the jurisdiction are R/ECAP.

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

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

A review of HUD Table 8 Public Housing Race/Ethnicity indicated that there are some differences among the composition of protected class households in public housing units.

The Housing Authority of Clackamas County (HACC) maintains five (5) Public Housing (PH) developments. One of the developments, Hillside Manor, has no children, 93% of the residents are white, 5% are Black, 2% Hispanic and no Asians. In the four (4) other HACC Public Housing developments the range of the white population is from 87 to 82%. The Hispanic population ranges from 11% to 2% with 2 developments having well above the jurisdictional Hispanic population of 7.73%. Oregon City View Manor has a Hispanic population of 9% and Clackamas County HA (scattered sites) has a population of 11% Hispanic. The Clackamas Heights PH has a Black population of 9% which is well above (10 times) the jurisdictional Black population of 0.74%.

The twelve (12) Project-Based Section 8 Developments in the jurisdiction have a White population range of 100 to 77%, a Hispanic population range of 0 to 15%, an Asian population range of 0 to 11% and only three developments have a Black population of 2 to 3%. The 28 one-bedroom units at Hollyfield Village for elderly and disabled persons has a 100% white population. The 31 family units at Seneca Terrace has an 11% Asian population. The Ridings Terrace I and II (34 family units) has a population of 11% and 15% Hispanic families.

The seven (7) Other Multi-family developments, have a white population range of 100% to 86%, no Black population, a Hispanic population range of 0 to 7% and an Asian population range of 0 to 5%. Two (2) developments Meadowlark and Creekside Woods have a 100% white population although these demographics may have changed in the 5 years since the census data was collected for 2010. However these units may have relatively low resident turnover since Meadowlark is housing for seriously mental ill persons and Creekside Woods is senior housing.

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

No additional relevant data.

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

Public Housing units are located in the Oregon City and in the City of Milwaukie and Housing Choice Voucher participants are located throughout the county. The race and ethnicity percentages for Housing Choice Vouchers match with the race/ethnicity percentages in the county. 82% of the voucher households have children. The data in HUD table 8 is rounded to the nearest whole number percentage which may have some effect on the following analysis.

When comparing the race/ethnicity data at the Oregon City View Manor public housing units to data in the census tract, there are fewer white persons by 7%, more Black persons by 4.5%, more Hispanic persons by 4.19% and fewer Asian persons by 0.19%. Families with children are 43% of all housings at the Oregon City View Manor.

Comparing the race/ethnicity data at Hillside Manor units to data in the census tract (in Milwaukie), there are more white persons by 6.85%, more Black persons by 2.95%, fewer Hispanic persons by 3.98% and fewer Asian persons by 1.61%. Hillside Manor has no households with children and no Asian households.

Hillside Park has 27% of households with children and is located next to Hillside Manor. Comparing the race/ethnicity data at Hillside Park to data in the census tract, there are more white persons by 0.85%, more Black persons by 2.95%, fewer Hispanic persons by 1.98% and fewer Asian persons by 0.61%.

The Clackamas Heights public housing units are located in Oregon City. Comparing the race/ethnicity data at Clackamas Heights to data in the census tract, there are fewer white persons by 3.98%, more Black persons by 8.51%, fewer Hispanic persons by 1.81% and fewer Asian persons by 0.19%.

There are 12 Project Based Section 8 developments listed in HUD Table 8. The Our Apartment development has no data listed which may be due to the Section8 contract expiring in 2012. Five of the Section 8 projects; Ikoi So, Carriage Court, 300 Main, Hollyfield Village and Cascade Meadows are senior housing units with no children. The remaining six are for low-income families.

Ridings Terrace I and II are in Molalla with 85% and 54% of households having children. Ridings Terrace I has 0.86% more white persons than the census tract, no black persons and only 0.36% in the census tract, 2.19% less Hispanic persons than in the census tract and no Asian persons and 0.73% in the census tract. Ridings Terrace II has 6.17% less white persons than the census tract, no Black persons and only 0.36% in the census tract, 1.81% more Hispanic persons than in the census tract and no Asian persons with 0.73% in the census tract.

Rosewood Terrace and Oregon City Terrace are both in Oregon City with 73% and 62% of households with children. Rosewood has 5.24% more white persons than in the census tract, no Black persons, no Asian persons and the same percentage of Hispanic persons as in the census tract (8% and 7.96%). Oregon City Terrace has 0.76% less white persons than the census tract, 1.64% more Black persons, 0.96% less Hispanic persons and 1.06% more Asian persons than the census tract.

The Willamalane apartments are in Milwaukie with 42% of households having children. Willamalane has 11.88% more white persons than the census tract, 1.72% more Black persons, 7.28% less Hispanic persons than the census tract and no Asian persons with 2.02% in the census tract.

Seneca Terrace is also in Milwaukie with 69% of households having children. Seneca has 10.78% more white persons than the census tract, no Black persons with 1.81% in the tract, 11.27& less Hispanic persons than in the tract and 7.89% more Asian persons than in the tract.

Only one of the seven (7) Other Multi-family housing developments listed in HUD Table 8 is for families: Charleston Apartments in Wilsonville. Three are for seniors only: Whispering Pines in Estacada, Oakridge Apartments in Lake Oswego and Creekside Woods in Wilsonville. The remaining three are for mentally ill and seriously mentally ill persons: Meadowlark Apartments and Oakridge Apartments in Oregon City and Renaissance Court in Wilsonville.

The Charleston Apartments have 14% of households with children and only white and Hispanic persons, no Black or Asian persons. The Charleston has 3.52% more white persons than in the census tract, 1.89% less Hispanic persons than in the tract, no Black persons with 0.68% in the tract and no Asian persons with 3.81% in the tract.

The data compared between the housing occupied and the census tracts is from the 2010 census data which at the time of this analysis is 5 years out of date. The actual demographics may be changed.

c. Disparities in Access to Opportunity

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

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

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

2. Additional Information

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

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

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

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

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

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

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

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

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

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

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

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

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- **Land use and zoning laws #1**
- **Community opposition #3**
- Impediments to mobility
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of regional cooperation
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- **Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs**
- **Source of income discrimination#2**
- Other

Clackamas County has no HUD identified RE/CAP areas and low segregation according to Table 3. Maps 5 and 6 indicate that publicly supported housing in all categories is distributed throughout the populated areas of the county. The County and the Portland

Metro region are currently experiencing a housing crisis due to high demands for housing units. The current high housing demand is increasing the cost of purchasing homes and increasing the cost of rental housing.

Fair Housing Issues and Contributing Factors:

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

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

3. Source of income discrimination, Segregation: Public housing residents report much difficulty in finding affordable rental units in general and in some communities in particular. 20% of all complaints filed with the Fair Housing Council of Oregon from July 1, 2014 to June 30, 2015 were in relation to Source of Income. The Fair Housing Council of Oregon continues process complaints regarding source of income discrimination. The Oregon State legislature recently passed legislation that landlords and property managers could not discriminate against persons with Section 8 or Housing Choice Vouchers as a source of rent, however, violations may still occur.

4. Community Opposition, segregation to specialized multifamily housing: some communities are resistant to change, particularly those communities that are primarily single family home communities with very few multifamily housing developments. More public relations and advocacy will need to occur in these communities to demonstrate the benefits of a range of housing choices for all residents in each community, particularly persons with disabilities, elderly persons and persons with

diverse ethnic backgrounds. Respondents to the AFH community survey continue to express opposition to "Section 8 housing" due to fears that affordable housing somehow degrades the value of neighborhoods.

The public housing in the jurisdiction and in the region is competing with private market housing for land and for tax base dollars to each community. So far private single family housing is winning because homeowners bring property tax revenue to each community. Multifamily housing that is affordable to low-income tenants is typically run by a non-profit does not create much tax revenue other than the initial cost of building permits and system development charges. The jurisdiction is also continuing to encourage siting multifamily developments in high opportunity areas encouraging density in areas such as the Clackamas Town Center and in North Clackamas.

D. Disability and Access Analysis

1. Population Profile

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

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

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

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

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

2. Housing Accessibility

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

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

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

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

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

Table 15 indicates that persons with disabilities are able to access publicly supported housing in the jurisdiction and in the region. In Public Housing 34.77% of residents in the jurisdiction have a disability while 34.55% of residents in the region for a minimal difference of 0.22%. Projected based Section 8 - 29.38/29.97% a difference of 0.59%. In other multi-family housing 32.71/34.86% a difference of 2.15%. In the Housing Choice Voucher (HVC) program 26.2/32.23% a 6.03% difference. In the region, Other Multi-family housing has 2.15% more persons with disabilities than the jurisdiction and in the HCV program the region has 6.03% more persons with disabilities participating. The region may have more people who transition in and out of publicly supported housing than in the jurisdiction which has a more stable population. The November 2014 wait list for HACC public housing units in the jurisdiction had over 6,000 households requesting access to housing. 29% or 1,796 households included someone with a disability.

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

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

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

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

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

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

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

The range of affordable housing options for persons with disabilities is limited based on the lack of availability of affordable housing units in general in the jurisdiction and the region. A recent regional Metro Housing Equity 2016 Report detailed the lack of affordable housing units referenced as "missing middle" housing units. "There are currently approximately 30,000 income-restricted units of housing regulated to remain affordable to households making less than 60 percent of median income, and approximately 73,000 units of market-rate housing that are affordable at this level (although rising rents will cause this number to diminish) in the four-county metro region. With over 185,000 households making less than 60 percent of median income, that leaves a shortage of more than 80,000 units of affordable housing." *Metro Opportunities and challenges for equitable housing, January 2016* website: **oregonmetro.gov/equitablehousing.**

4. Disparities in Access to Opportunity

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

i. Government services and facilities

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

iii. Transportation

iv. Proficient schools and educational programs

v. Jobs

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

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

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

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

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

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

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

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

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

5. Disproportionate Housing Needs

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

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

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

6. Additional Information

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

The Clackamas County Development Disabilities Program provides case management services, to 2,165 developmentally disabled persons in the jurisdiction. County staff guide persons with disabilities to resources and services that support the person, based on assessed needs and types of services requested. County staff may also assist persons with disabilities to enter into Foster Care or Group Home if needed. Some of the 2,165 people may receive their case management from one of the five Support Service Brokerages that operate in the jurisdiction.

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

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

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

7. Disability and Access Issues Contributing Factors

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

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

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

The greatest contributing factor for persons with disabilities and access to housing is the overall lack of affordable, accessible housing in range of unit sizes. As referenced earlier in this assessment, a housing equity report found that the housing availability shortfall was over 80,000 housing units in the region.

The second greatest contributing factor is a lack of access to publicly supported housing for persons with disabilities due to the lack of available units. This factor is detailed in the PHA November 2014 waiting list of over 6,000 households with 29% of households including a person with a disability.

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

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

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

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

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

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

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

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

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

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

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

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

The HRR program provides bilingual staff to offer fair housing services to Spanish speaking residents of Clackamas County including assisting clients with filing HUD discrimination complaint forms and information to landlords regarding their rights and obligations under the fair housing law. These services are also available to those speaking other languages with translation through the Language Line.

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

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

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

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

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

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

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

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

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

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

4. **Additional Information**

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

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

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

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

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

A third of LASO client requests for legal assistance is related to housing. LASO is unable to meet the need. A shortage of affordable housing in Clackamas County has an impact on all populations we serve, but is particularly acute in vulnerable populations such as limited English Proficient Population (LEP), communities of color, persons with disabilities and other protected groups. Tenants are fearful of requesting repairs due to the risk of losing their housing. As a result, severe habitability issues are left unchecked.

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

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

LASO PRO places an emphasis on litigating affirmative fair housing cases and/or habitability cases with larger landlords that prey on or whose practices have an effect on vulnerable populations. Civil legal services is an essential component to

fair housing enforcement the goals of affirmatively furthering fair housing. To increase the level of impact to larger populations, the ratio of intake and advice to full representation needs to shift so that LASO can litigate more priority cases to more effectively address housing problems in Clackamas County. Additional litigation requires increased attorney staff and other resources.

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

FHCO also is continuing to increase its capacity in providing technical assistance in the area of Affirmatively Furthering Fair Housing (AFFH). AFFH is a technical area of the federal Fair Housing Act that has the potential to positively impact systemic issues related to housing opportunities, such as land use decisions by local jurisdictions that may disparately impact members of protected classes.

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

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

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

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

reported. The Fair Housing Council of Oregon has no authority to enforce fair housing laws.

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

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

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

VI. Fair Housing Goals and Priorities

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

The Contributing Factors listed below are listed in order of priority with #1 being the highest priority and #11 being the lowest priority.

1. Lack of affordable, accessible housing in a range of unit sizes. The jurisdiction and the region is currently in a rapid population growth after an economic slow period. The rapid population growth is bringing an estimated 100,000 people per year to the region, which is increasing the demand for housing units to own or rent. Low income households and protected classes are directly impacted by the increased housing demand. The waiting list for public housing in the jurisdiction was more than 6000 households in 2014. A 2015 regional Housing Equity Report found that the region has a shortage of 80,000 units of

affordable housing. The majority of resident feedback during community meetings was that most people liked where they lived, however, many people including persons with disabilities felt that is was very difficult to find another affordable unit should they want to move. Though current state law provides a mechanism to ensure that a certain percentage of new development is reserved for low-income tenants (known as "inclusionary housing" or "inclusionary zoning"), this jurisdiction has not yet enacted or implemented this structure.

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

2. Availability of affordable units in a ranges of sizes: The wait list for public housing assistance was more than 6,000 households in 2014. The 2016 public housing wait list was more than 4,000 households requesting assistance. The current housing market has a vacancy rate of less than 2% which is causing rents to increase monthly in some cases. Apartment buildings are being purchased and remodeled to increase rent revenue while many people are being given "no cause" evictions. The largest city in the region, Portland, Oregon has proposed enacting a 3-month eviction/rent increase moratorium to provide renters time to find new units or adjust to the rent increase.

3. Displacement of residents due to economic pressures: The city of Portland declared a homeless housing emergency in October 2015 to increase efforts to find solutions to homelessness and the housing shortage crisis. The high demand for private market housing has increased rent levels by 300% in some cases. Under current law, private landlords can evict residents without a reason ("no-cause eviction") and this type of eviction frequently masks unlawful eviction that is retaliatory or discriminatory. There is no legal mechanism for stabilization of rents in Oregon. Evicted residents in urban areas close to jobs, schools and services are being pushed out to suburban areas to find affordable rental units, however, less than 5% of housing units are available to rent. Evicted residents in urban areas close to jobs, schools and services are being pushed out to suburban

areas to find affordable rental units, however, less than 2% of housing units are available to rent. The end result is a concentration of poverty and minority households outside areas of high public investments. In some instances, lower-income minority households are being displaced out of one jurisdiction and into specific areas of adjacent jurisdictions that lack the social and physical amenities of their prior homes.

4. Community opposition: Affordable housing projects when proposed often face community opposition to affordable "housing projects" that bring "poor people" into a neighborhood. Many homeowners are concerned that "Section 8" housing and other affordable housing units will degrade property values in expensive neighborhoods. Low-income and protected classes that currently live in these communities would directly benefit from new affordable housing units. Oftentimes, multi-family units may only be constructed where the land has been zoned as high or medium density residential. Community Opposition is institutionalized by smaller communities with city councils and land use planning boards that write zoning and land use ordinances which prohibit or allow new multi-family and affordable housing projects. These zoning and land use ordinances may further concentrate poverty or segregate low-income people out of communities.

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

Additional concern is the lack of reliable data on the minority households within the LIHTC housing. HUD provided data (Table 8) is 5 years out of date at the time of this report. As a result, it is very difficult to track whether or not minority households that qualify for LIHTC are actually adequately represented in the tenant population or if there are additional barriers in the housing application and screening process that may violate fair housing laws. Lastly, because of community opposition to "subsidized" housing, the majority of LIHTC that are

built restrict the tenant population to seniors. This type of housing is found most often in the higher income, predominantly white communities with the most social and physical amenities (transportation, access to good schools/grocery stores) while "subsidized" housing for minority families are often located outside of such areas of high opportunity.

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

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

Private discrimination may also occur when requests for repairs are ignored by property managers. Habitable housing is healthy housing free of leaks, mold and pests. Unhealthy rental housing is poorly maintained and generally occupied by low-income vulnerable populations. The critical shortage of affordable rental

housing units in the jurisdiction makes tenants fearful of requesting repairs due to risk losing their housing from retaliation and eviction.

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

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

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

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

conducting housing discrimination legal actions and is no longer recognized by HUD as equivalent to HUD for enforcement actions.

10. Land Use and Zoning Laws: Multi-family housing developments are typically restricted to areas that are zoned as high or medium density residential in each community and throughout the jurisdiction. Communities have many requirements for multifamily housing including: amenities such as onsite parking, fire access, buildings that "match" the character of the neighborhood and traffic impact studies, etc. All these requirements of multifamily housing projects increase the initial cost and result in affordable housing that is expensive to build and maintain. The State of Oregon has a land use plan (Goal 10) that requires all communities to allocate land for multifamily developments however some communities are more compliant than others. State and regional housing advocates are beginning to challenge communities to meet the Goal 10 requirements to provide land for multi-family housing developments. In 2015 Housing Land Advocates joined the Coalition for Affordable and Safe Housing to repeal Oregon's ban on inclusionary zoning, and allow Oregon communities access to this important tool for creating affordable housing in areas of opportunity. In 2015 the repeal was narrowly defeated in the legislature. (https://housinglandadvocates.org/resources/land-use-and-housing/inclusionary-zoning-in-oregon/)

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

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

Goal 1	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant(s)**
Develop new housing units with long-term affordability for a broad range of low-income households with an emphasis on dispersal of affordable housing.	Lack of affordable, accessible housing in a range of unit sizes. Community Opposition Displacement of residents due to economic pressures Land Use and Zoning Laws	Disproportionate housing needs. Disparities in Access to Opportunity	Construct 500 new units of affordable (rent restricted units) housing over the next 5 years in areas of high opportunity. By 2018 the jurisdiction will adopt a Strategic Housing Plan.	H3S and HACC (Jurisdiction and public housing agency)

Discussion: More affordable and accessible housing in our jurisdiction will directly benefit low-income households, vulnerable populations and protected classes. Affordable housing units once completed will include eligibility requirements for low income and disabled persons. Affordable housing development organizations will be required to reach out to protected classes and vulnerable low income populations in the jurisdiction.

A recent regional Metro Housing Equity 2016 Report detailed the lack of affordable housing units referenced as "missing middle" housing units. "There are currently approximately 30,000 income-restricted units of housing regulated to remain affordable to households making less than 60 percent of median income, and approximately 73,000 units of market-rate housing that are affordable at this level (although rising rents will cause this number to diminish) in the four-county metro region. With over 185,000 households making less than 60 percent of median income, that leaves a shortage of more than 80,000 units of affordable housing." …

The areas identified as having high concentrations of ethnicity and low income households are also areas that have high concentrations of multi-family housing rental units which are zoned for medium and high density residential uses. A Strategic Housing Plan will guide jurisdiction efforts to efficiently get more units built and occupied by low-income households and members of protected classes.

A jurisdiction Strategic Housing Plan will include:

- Conducting a study local zoning codes as to whether "up-zoning" in particular neighborhoods would affirmatively further fair housing as well as potential strategies to enact Inclusionary Zoning ordinances pursuant to Oregon HB1533 in 2016.

- A study of segregation in the jurisdiction using current census data including demographics by community and relationship to school quality will be included in the Strategic Housing Plan.

- An affordable housing dispersal plan to de-concentrate areas of high concentrations of ethnicity and poverty areas by developing new rent restricted housing units in communities that currently have less multi-family housing units. Any new rent restricted housing units will be build either in or close proximity to areas of opportunity.

- An exploration of possible tenant protections from "no cause" evictions due to economic pressures on private housing in unincorporated areas of the jurisdiction.

- Discussion on how to establish, allocate and fund a Housing Trust Fund to provide additional resources for affordable housing in the jurisdiction.

- An exploration of options to establish and fund a land trust to increase available land for affordable housing developments in the jurisdiction.

Goal 2	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant(s)**
Increase accessibility to affordable housing for persons with disabilities and single parent households.	Discrimination Availability of affordable units in a ranges of sizes Lack of available accessible units. Displacement of residents due to economic pressures	Disparities in access to housing Disproportionate housing needs.	By 2018 begin collecting data on persons with disabilities access to home ownership and rental units in the jurisdiction. Beginning in 2017 promote	H3S Housing Programs and HACC

			the availability of any new affordable housing units directly to persons with disabilities and female headed households.	

Discussion: Persons with disabilities feel they have limited housing choices, can't find affordable accessible units, housing market demands increasing rents, complaint data indicates that 46% of fair housing complaints in the jurisdiction are regarding reasonable accommodation requests for physical and mental illnesses.

Persons with Disparate Housing Needs will be assisted with the increase in availability of affordable housing units through marketing of any new affordable housing units directly to persons with disabilities and advocacy organizations.

The jurisdiction will direct efforts to familial status households with the greatest need for housing and services. Single parent familial status households struggle to find affordable 2 and 3 bedroom units. Female-headed households with children (Single mothers) are far more likely to live in poverty than other household types. 25.4% of Female Head of Household families have income at or below poverty according to a County 2014 Poverty Report.

Goal 3	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant(s)**
Improve access to housing and services for all protected classes with a focus on LEP populations.	Lack of affordable, accessible housing in a range of unit sizes. Lack of Assistance for housing accessibility modifications.	Disparities in access to housing. Disparities in access to opportunity Disproportionate housing needs.	By 2018, provide information to housing programs in 2 additional languages for the Housing Rehabilitation program. By 2019 establish	All (jurisdiction) County Departments HACC and H3S housing programs

			written policy on assisting persons with sensory impairments to access H3S housing programs and services. (hearing and vision) By 2020 the County will include a standard for the use of translation and interpretation services in the Title VI plan. By 2019 revise all public housing admissions criteria with respect to tenants with criminal records to align with HUD Guidance issued in April 2016. By 2018, provide jurisdictional support for state legislative policy changes to enact "banning the box" for all housing in Oregon.	

Discussion: Race and National Origin are protected classes. Both the Hispanic population and the LEP population (a subset of the National Origin protected class) is growing in the region and in the jurisdiction. The jurisdiction plans to provide more information about housing programs directly to LEP populations in additional languages including Russian and Chinese.

The Housing Authority of Clackamas County (HACC) currently has forms in both Spanish and Russian as well as an interpreter service and services for hearing impaired applicants for housing assistance.

The jurisdiction will identify persons in protected classes who have the greatest need for housing and services. Persons with disabilities in our jurisdiction have limited housing options due to the lack of affordable accessible housing units. The H3S Housing Rehabilitation program helps low-income persons with disabilities to remain in their homes and have and have more access to opportunities in their communities due to increased mobility in their homes. The H3S HOME program funds a limited number of affordable housing units that are generally part of larger housing developments. The H3S Social Services Division operates a number of homeless housing programs.

H3S housing programs are currently lacking materials and training to assist persons with sensory impairments (hearing and vision) who request access to housing programs. The 2016 Oregon State Impediments to Fair Housing Choice report Finding #1 was that Persons with Disabilities face widespread barriers to housing choice statewide.

Clackamas County intends to improve access to public housing and County services such as parks, water, social services, health care, mental health services and juvenile services. The County is currently developing a Title VI Plan to clarify language services for LEP populations.

Criminal history records frequently present a barrier to accessing housing. This discrimination is having a disparate impact on African American and Hispanic men and their families. Private discrimination for a criminal history is one of the collateral "downstream" impacts of the racial and ethnic disparities in our local criminal justice system. HUD has begun providing training to fair housing organizations and housing providers to consider additional screening criteria to prevent a disparate impact in these populations seeking access to housing in the region and the jurisdiction.

The jurisdiction will ensure that all public housing admissions criteria are updated to align with the 2016 HUD Guidance on criminal history records to be considered during the housing application process. The jurisdiction will also support state legislative initiatives to ensure that all housing admissions criteria does not automatically disqualify persons who have criminal history records from eligibility for both private and publically supported housing.

Goal 4	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Enforce Fair Housing laws and Increase public understanding of Fair Housing laws.	Private Discrimination Lack of local private fair housing enforcement Lack of local public fair housing enforcement Lack of resources for fair housing agencies and organizations Community Opposition	Source of Income discrimination Discrimination Segregation Disparities in access to housing.	Annually, at least 400 landlords and renters will receive information on fair housing laws and training on rights and responsibilities of tenants and landlords. (2000 people over 5 years.) The number of potential discrimination referrals to Legal Aid and Fair Housing Council by Housing Rights and Resources program will be compiled and reported to HUD in CAPER reports.	HACC Landlord training. Housing Rights and Resources sponsored fair training events. H3S RentWell tenant education program. Fair Housing Council of Oregon. Legal Aid Services of Oregon.
Discussion: Private discrimination in access to housing continues to occur in the jurisdiction and the region. Clackamas County has the Housing Rights and Resources (HRR) Program to increase public awareness about fair housing and to provide tenants and landlords information about their rights and responsibilities in fair housing. When staff determine that a potential housing discrimination has occurred a referral is made to Legal Aid or to Fair Housing Council for further exploration. Between July 1, 2015 and June 30, 2016, more than 2000 people called this program for housing information. More than 800 callers were assisted with rights and responsibilities information. 80 of the callers were calling with a specific discrimination issue which was clarified by HRR staff and as appropriate, callers were referred to Legal Aid Services of Oregon. The				

HRR program serves a vital function to screen appropriate cases to Legal Aid services. The jurisdiction will explore funding and partnership options to expand these services.

The H3S RentWell program provides tenant education to help clients accept responsibility for rental histories, build skills needed to become good renters, and build skills to overcome individual barriers to permanent housing. RentWell services also include a rental assistance fund to assist landlords with eligible damages and to help clients with application fees, security deposits, cleaning deposits, moving expenses and other expenses to access rental housing.

The Housing Authority of Clackamas County (HACC) works with landlords to understand the Housing Choice Voucher program and to encourage landlords to accept Housing Choice Vouchers.

The jurisdiction's Fair Housing Council of Oregon (FHCO) complaint data collected from July 1, 2014 to June 30, 2015 resulted in 92 discrimination complaints. 46% of complaints were about accommodations for persons with either a mental or physical disability. 20% of households believed they had been discriminated against due to their family status. 11% of the complaint households believed they were discriminated against due to their national origin. 9% of households listed their source of income as a basis for discrimination and 5% believed they were discriminated against due to their race. Other complaints filed were in relation to discrimination due to domestic violence, marital status, sex and, sexual orientation.

The state Civil Rights Division, part of Oregon's Bureau of Labor and Industries (BOLI), is tasked with defending the rights of all Oregonians to equal opportunity in employment, housing, public accommodations and career schools. However, a year ago a legislative change made Oregon state fair housing laws no longer substantially equivalent to federal fair housing laws. As a result HUD terminated its contract/partnership with BOLI as of April 3, 2016 and now all federal claims of fair housing violations will have to be filed directly with HUD. This change in how complaints are filed presents a potential barrier to a reasonable length of time for the resolution of complaints, and therefore justice for complainants.

The 2016 Oregon State Impediments to Fair Housing Choice report Finding #2 was that Discrimination against protected classes persists statewide.

Goal 5	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant(s)**

Coordinate Fair Housing Advocacy and Enforcement Efforts among regional partners	Private discrimination Lack of local private fair housing enforcement Lack of resources for fair housing agencies and organizations Discrimination Lack of affordable, accessible housing in a range of unit sizes.	Segregation Disparities in access to housing Disparities in Access to Opportunity	By 2019 each jurisdiction in the region will have at least 1 shared goal. By 2020 produce a bi-annual regional fair housing report. By 2020 distribute the regional fair housing report to all regional governments and housing authorities.	H3S and HACC staff Fair Housing Council of Oregon

Discussion: The Clackamas County jurisdiction is located in the south east corner of the Portland Vancouver Metropolitan Statistical area also known as the U.S. Census Bureau Core-based Statistical Area. Region partners continue to coordinate efforts to promote and expand fair housing laws and improve housing choice for all protected classes. Regional partners are coordinating efforts with the Fair Housing Council of Oregon to collect discrimination complaint data for examination and dissemination to local jurisdictions. Improve data collection will boost efforts to make the public more aware of the persistent discrimination that occurs in the private rental housing market.

The jurisdiction does participate with regional partners to coordinate fair housing training events and advocacy efforts on an informal basis. Regional partners are supporting efforts by the Fair Housing Council of Oregon to expand resources, strengthen advocacy efforts and promote the benefits of fair housing for all communities. The housing market in the Portland Metro region also contains part of southwest Washington state including the City of Vancouver and Clark County. Part of the coordination effort includes data collection and dissemination of housing discrimination data.

As listed in the 2012 Analysis of Impediments to Fair Housing (Goal VI) local and regional data must guide planning efforts by; 1. Maintaining County data on violations and potential violations of fair housing laws and use to promote fair housing and to conduct fair housing training/education; 2. Coordinating with Housing Authority of Clackamas County to include annual reporting of wait list and housing recipients and; 3. Working with regional partners to identify and integrate additional available data in local and regional fair housing planning

Goal 6	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and**	**Responsible Program Participant(s)**

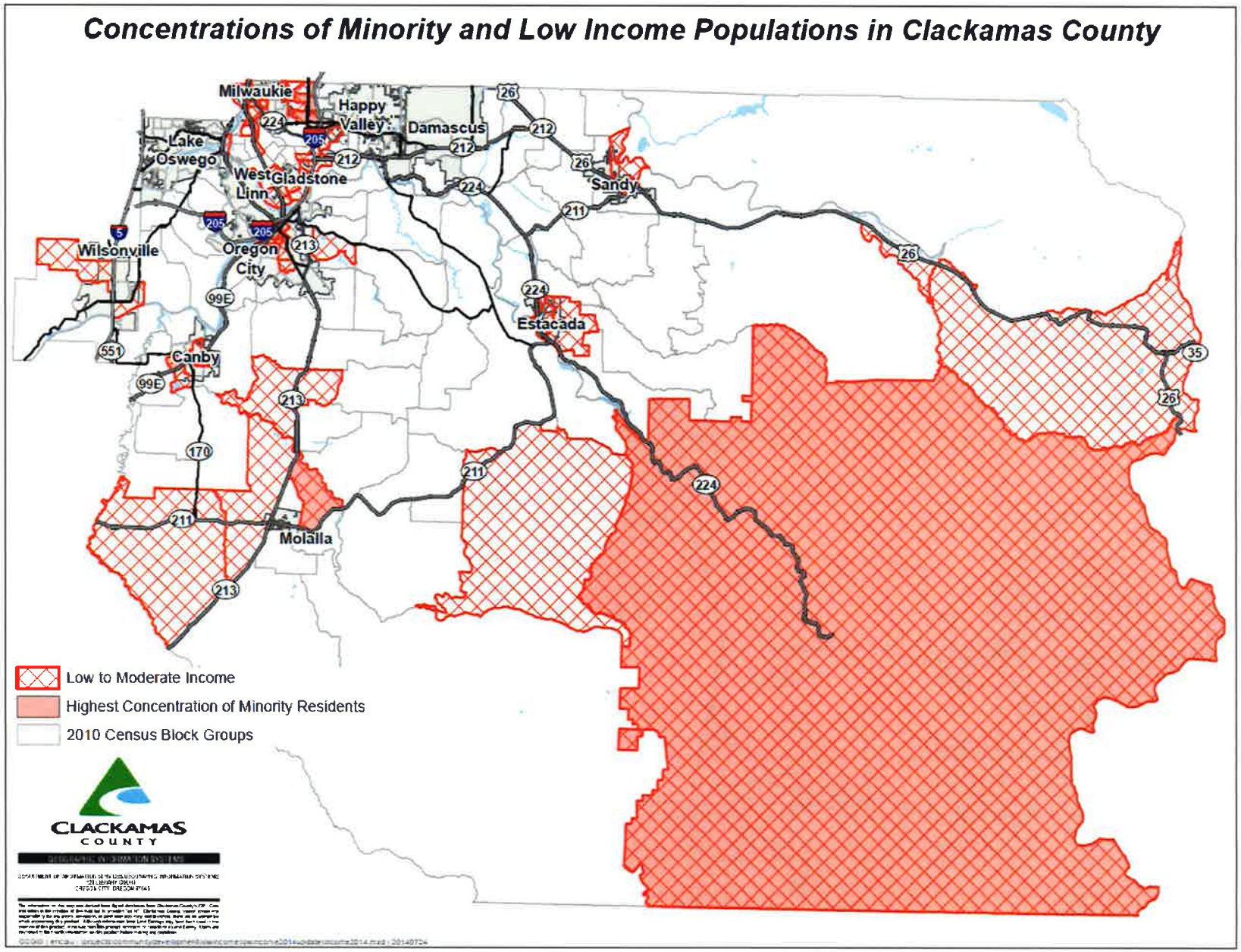
			Timeframe for Achievement	
Ensure that all housing in Clackamas County is healthy and habitable.	Lack of affordable, accessible housing in a range of unit sizes. Availability of affordable units in a ranges of sizes.	Segregation Disparities in access to housing	Jurisdiction/County Adoption of a Habitability building code by 2020.	H3S Housing Staff and HACC

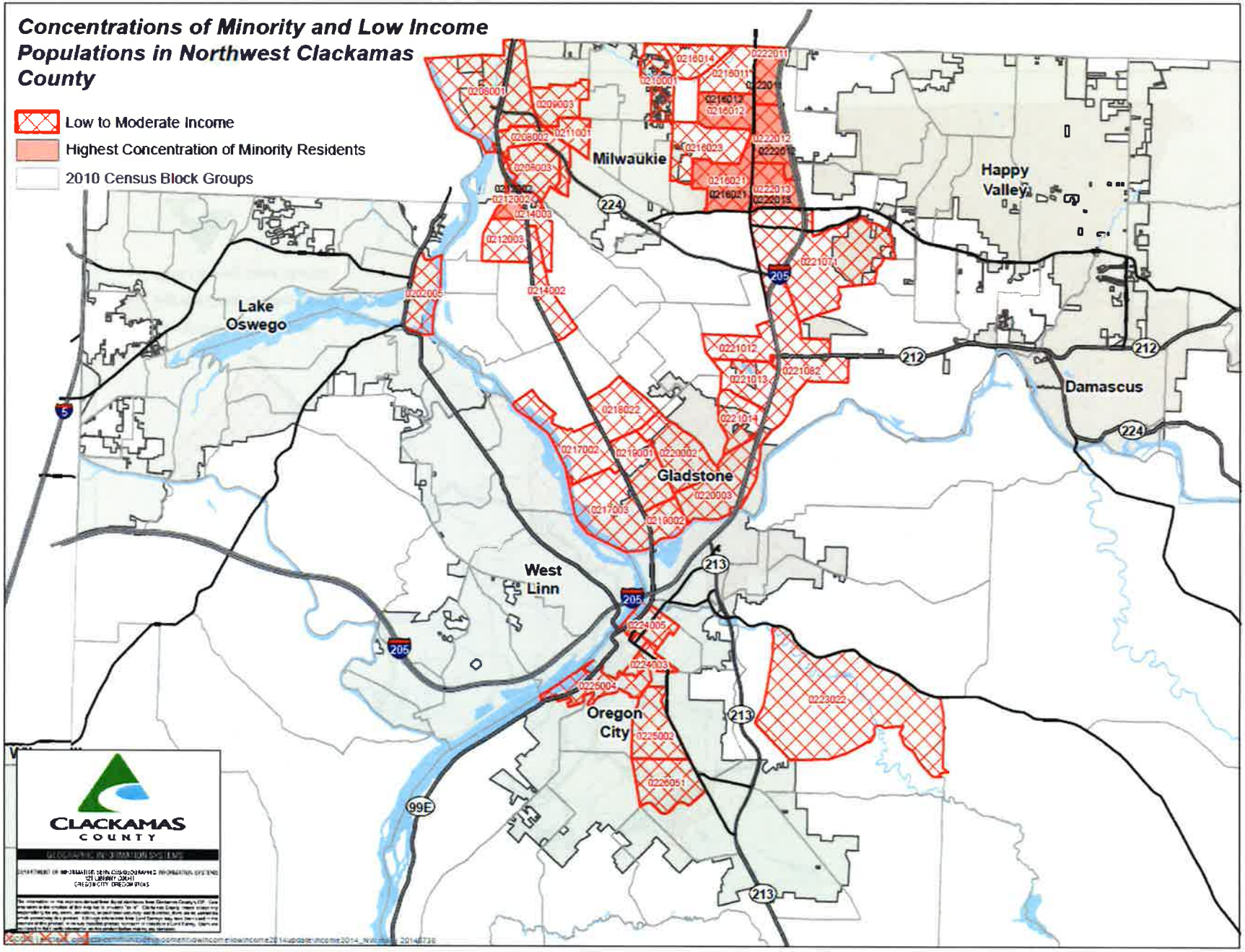
Discussion: The critical shortage of affordable rental housing units in the jurisdiction and the region, as well as the existence legal "no cause" evictions, makes tenants fearful of requesting repairs due to the risk of losing their housing from retaliation and eviction. Housing survey respondents and comments during community meetings exposed that vulnerable populations including fair-housing protected groups such as people of color, families with children and persons with disability are forced to live in unhealthy conditions including unaddressed vermin infestations and leaky roofs or leaky plumbing which causes mold and mildew in their rented homes because they cannot afford better housing. These sub-standard housing units further burden low-income and vulnerable populations with potentially chronic health conditions that may limit their access to opportunity in school and at work.

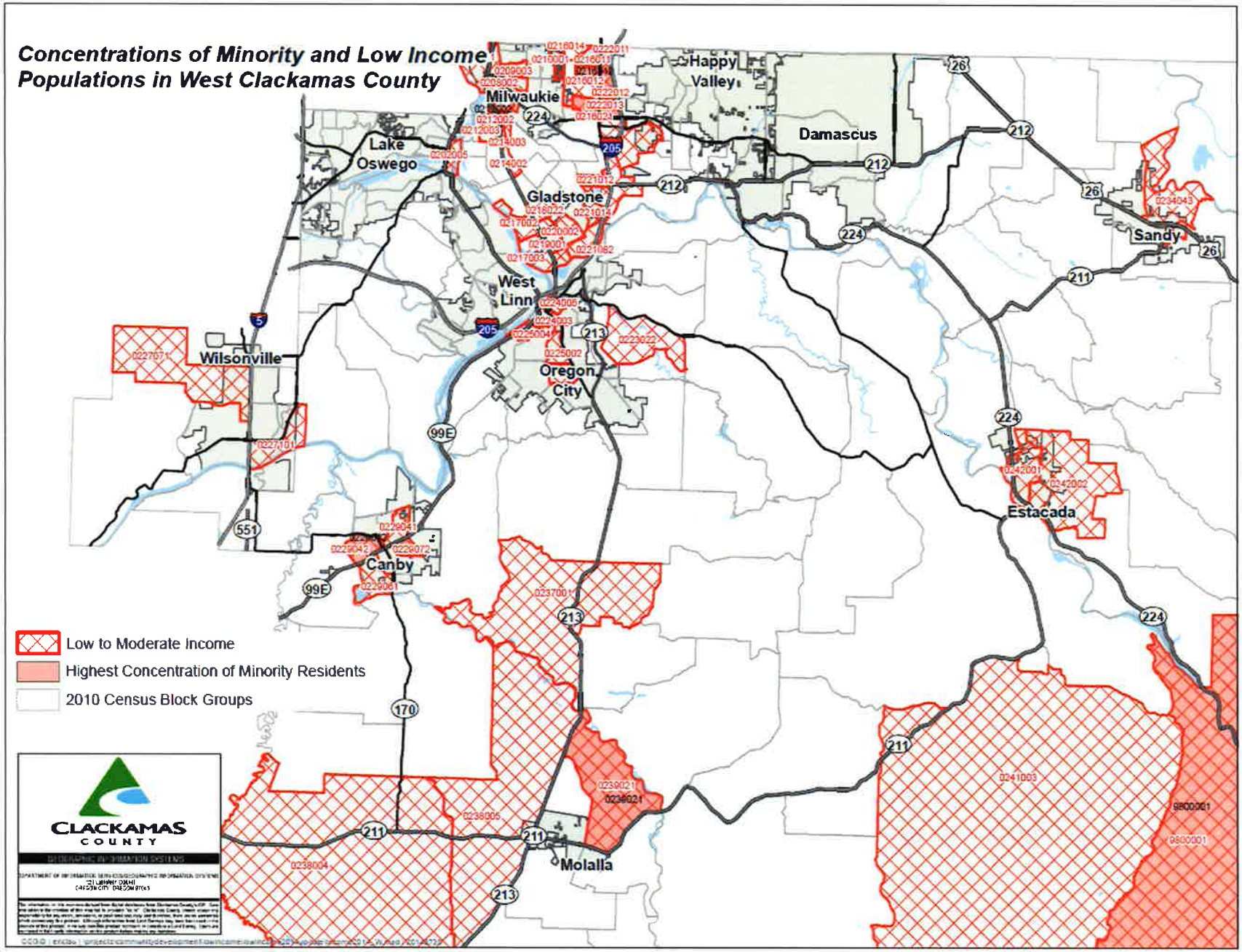
An enforceable residential rental maintenance standard would provide one mechanism to assure rental housing quality by requiring landlords timely to repair rental units. The state of Oregon's residential rental habitability statute, ORS 90.320, requires landlords to maintain premises in a habitable condition but the state law relies entirely upon private enforcement in court and low-income residents have very little access to legal representation to enforce their rights. Thus, the adoption of a housing inspection program to enforce residential rental maintenance standards would both alleviate potentially severe public health problems and affirmatively further fair housing.

The neighboring jurisdictions of Portland and Gresham have adopted similar residential property maintenance codes to assure rental housing is healthy and safe for low-income renters.

APPENDIX A - MAPS



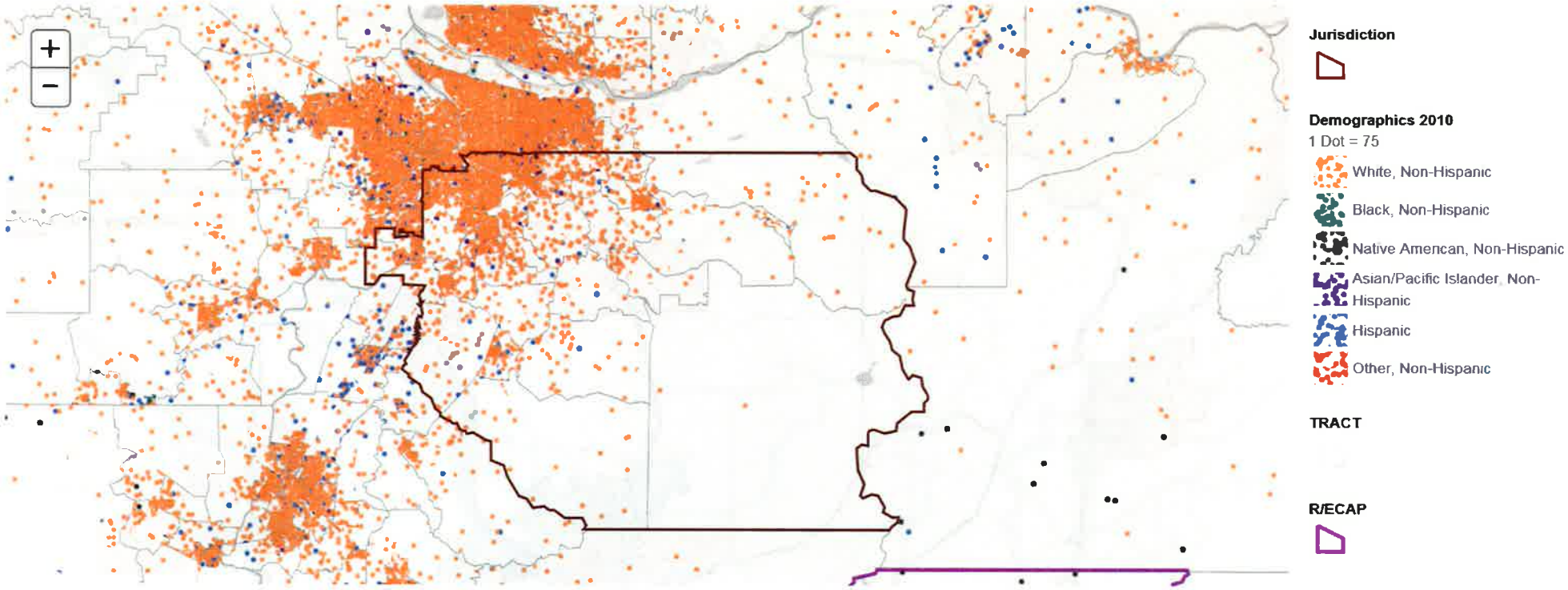

Concentrations of Minority and Low Income Populations in Northwest Clackamas County
Low to Moderate Income
Highest Concentration of Minority Residents
2010 Census Block Groups
Milwaukie
Happy Valley
Lake Oswego
Damascus
Gladstone
West Linn
Oregon City
CLACKAMAS COUNTY


Concentrations of Minority and Low Income Populations in West Clackamas County
Happy Valley
Milwaukie
Damascus
Lake Oswego
Gladstone
Sandy
West Linn
Wilsonville
Oregon City
Estacada
Canby
Molalla
Low to Moderate Income
Highest Concentration of Minority Residents
2010 Census Block Groups
CLACKAMAS COUNTY

Map 1 - Race/Ethnicity (Race/Ethnicity)

Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

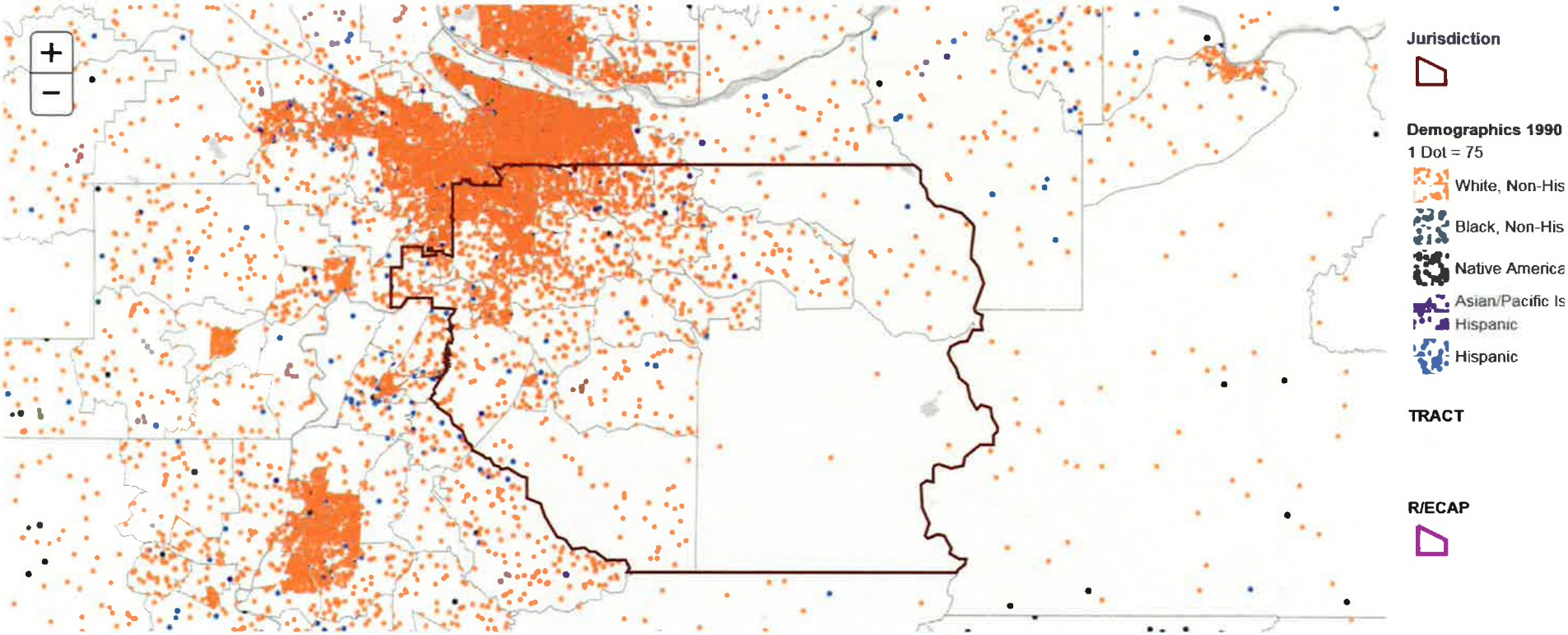
Clackamas County, OR (419005) Jurisidiction



Map 2 - Race/Ethnicity Trends (Race/Ethnicity Trends, 1990)

Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

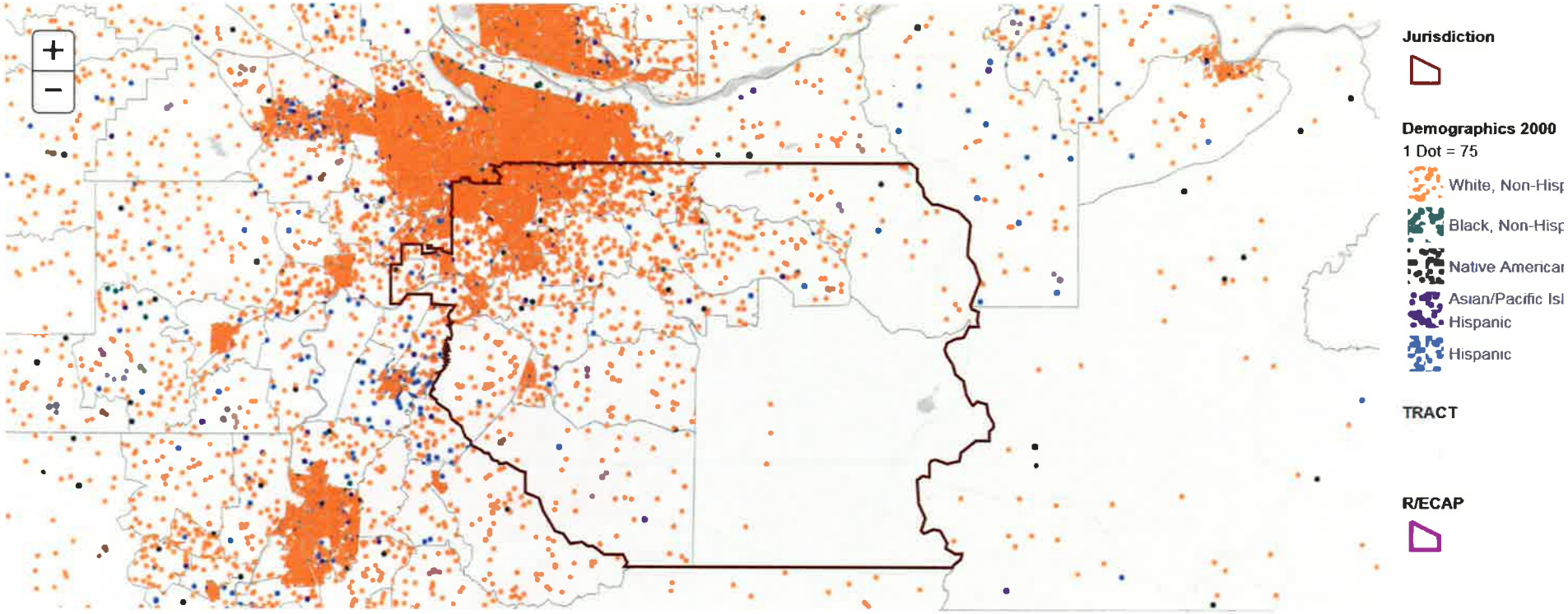
Clackamas County, OR (419005) Jurisidiction



Map 2 - Race/Ethnicity Trends (Race/Ethnicity Trends, 2000)

Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

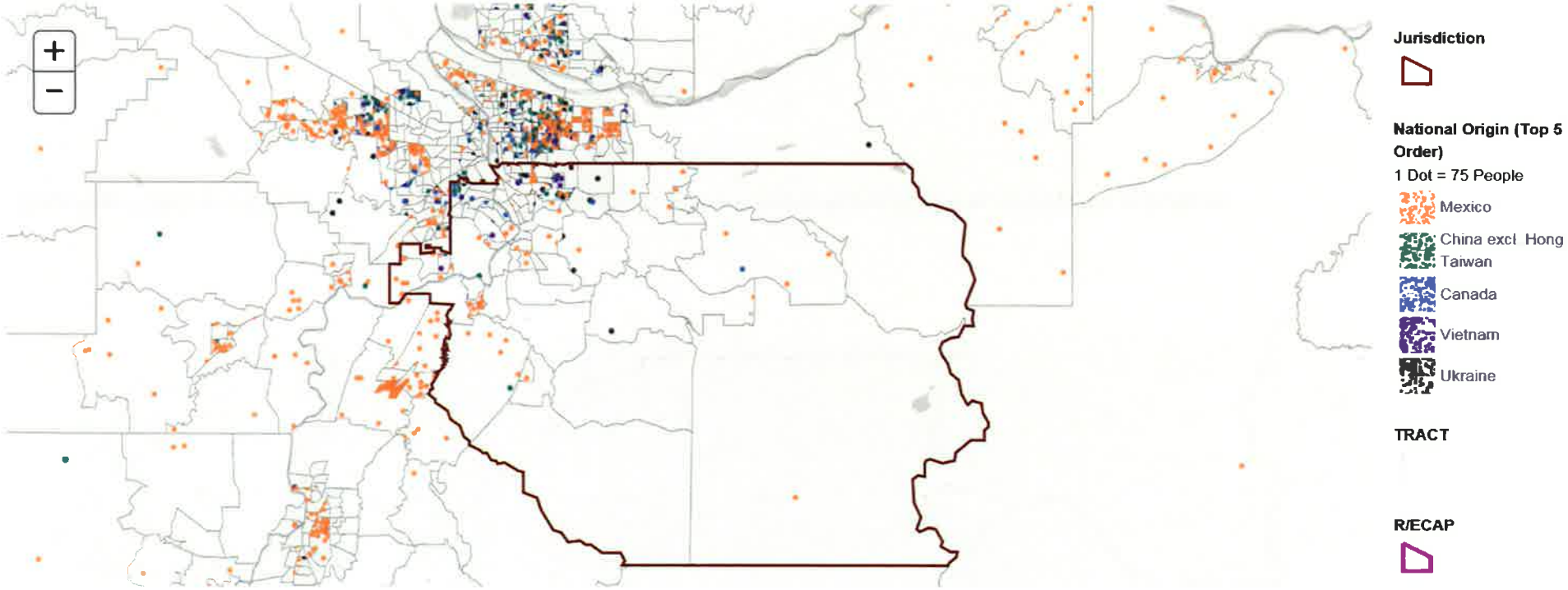
Clackamas County, OR (419005) Jurisidiction



Map 3 - National Origin (National Origin)

Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Clackamas County, OR (419005) Jurisidiction



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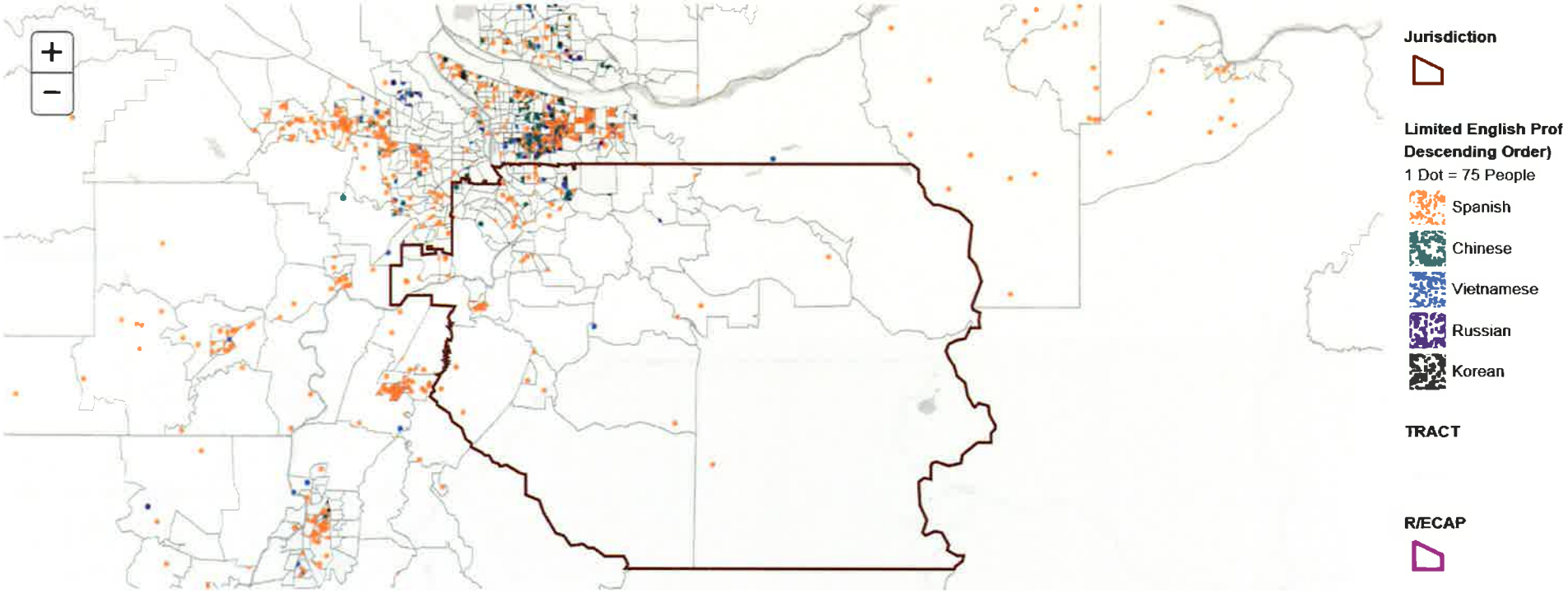
Map 4 - LEP (Limited English Proficiency)

LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Clackamas County, OR (419005) Jurisidiction

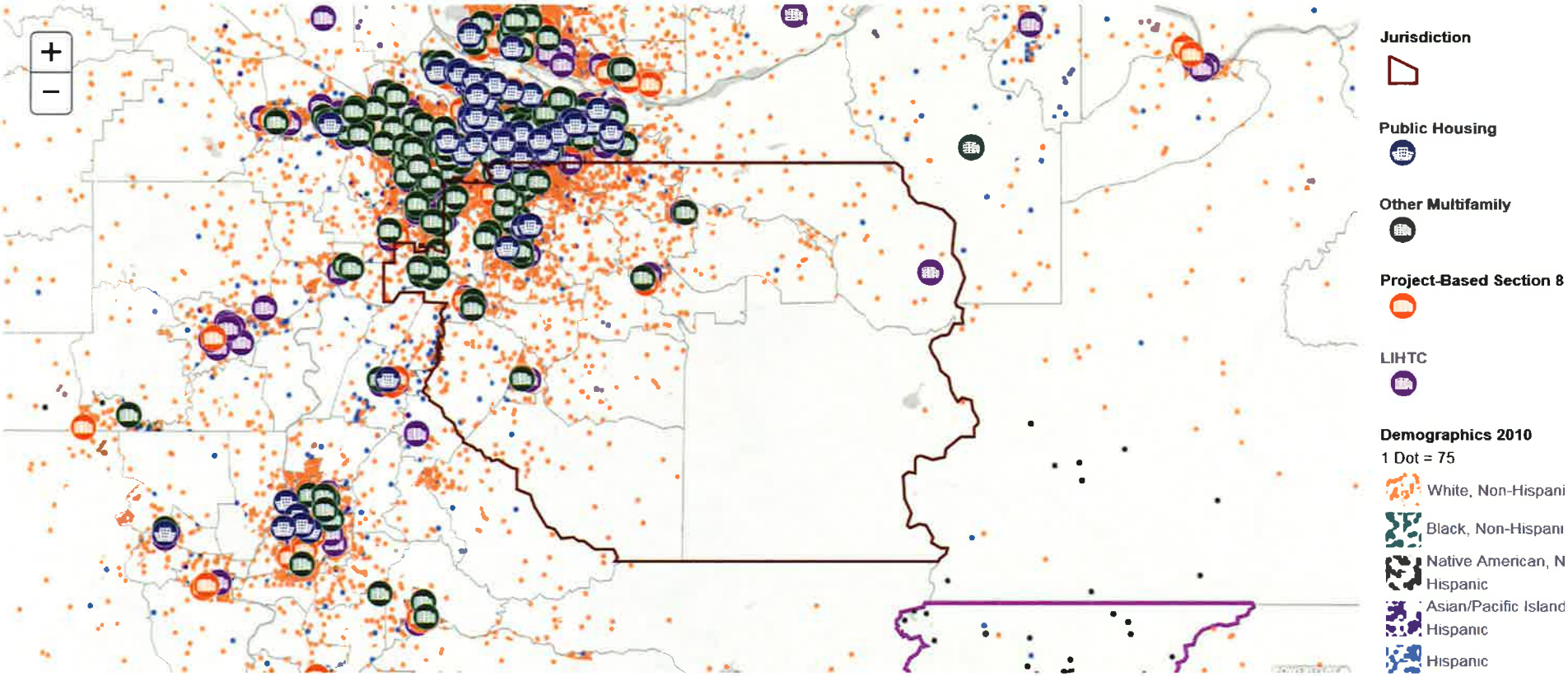


In Clackamas County in 2010 LEP is 4.54% of the population, LEP the Metro Portland Region (CBSA) is 7.23% of the population.

Map 5 - Publicly Supported Housing and Race/Ethnicity (Publicly Supported Housing and Race/Eth

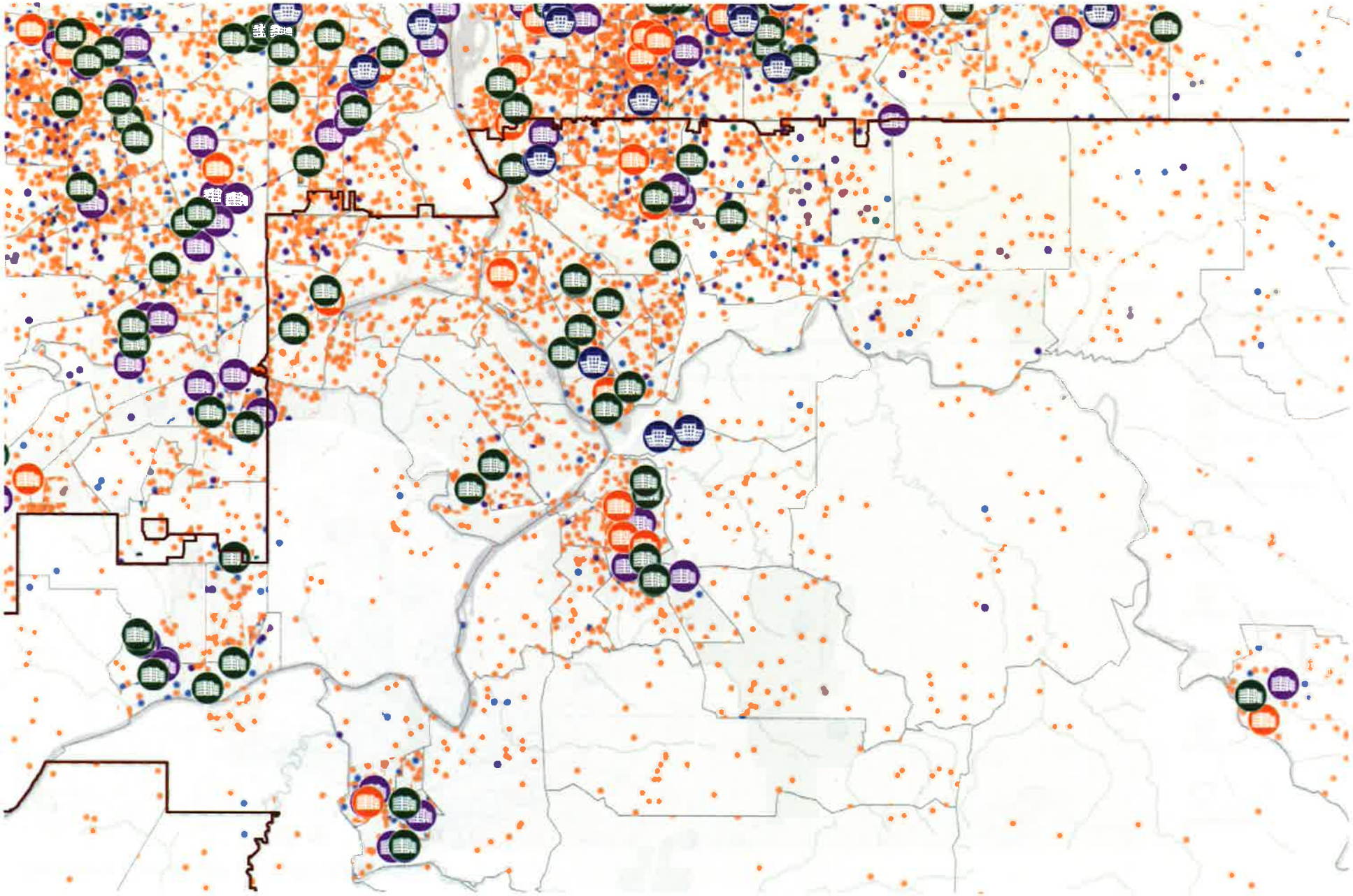
Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported h

Clackamas County, OR (419005) Jurisidiction



Locations of publically supported housing throughout the region.

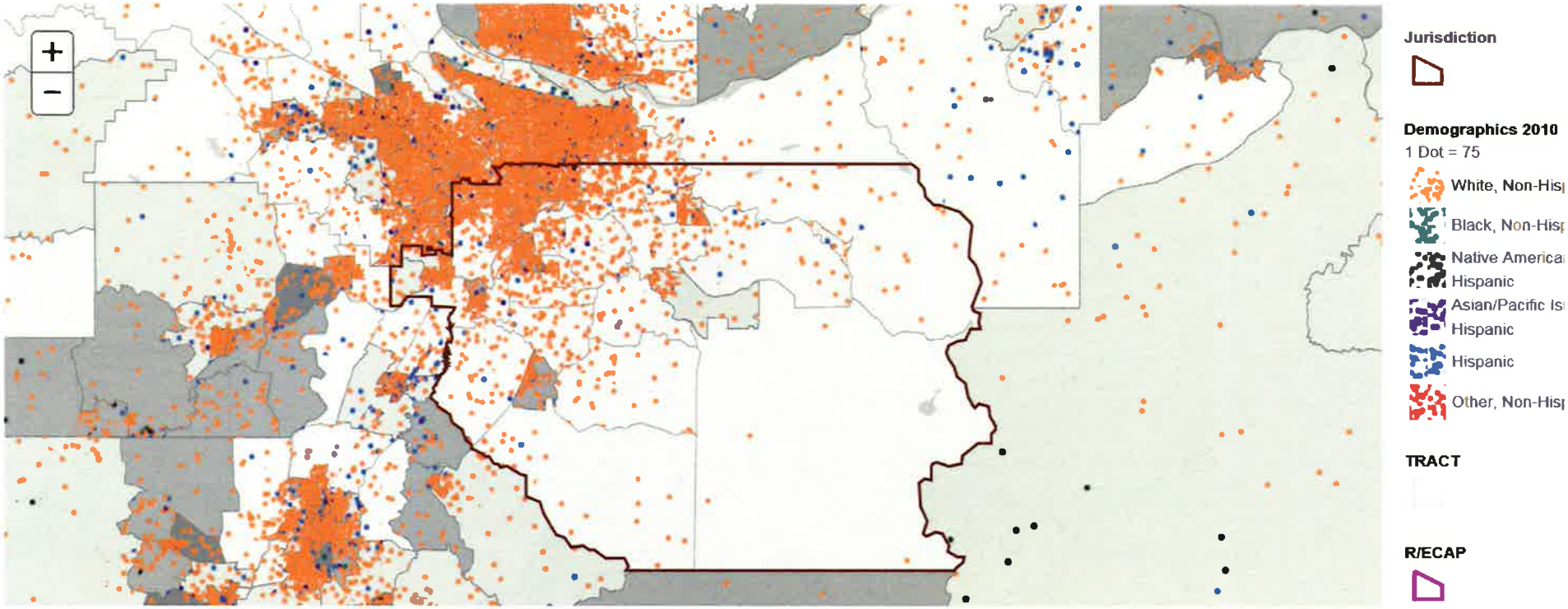
MAP 5 Zoom – Clackamas County - Northwest County



Map 6 - Housing Choice Vouchers and Race/Ethnicity (Housing Choice Vouchers and Race/Ethn

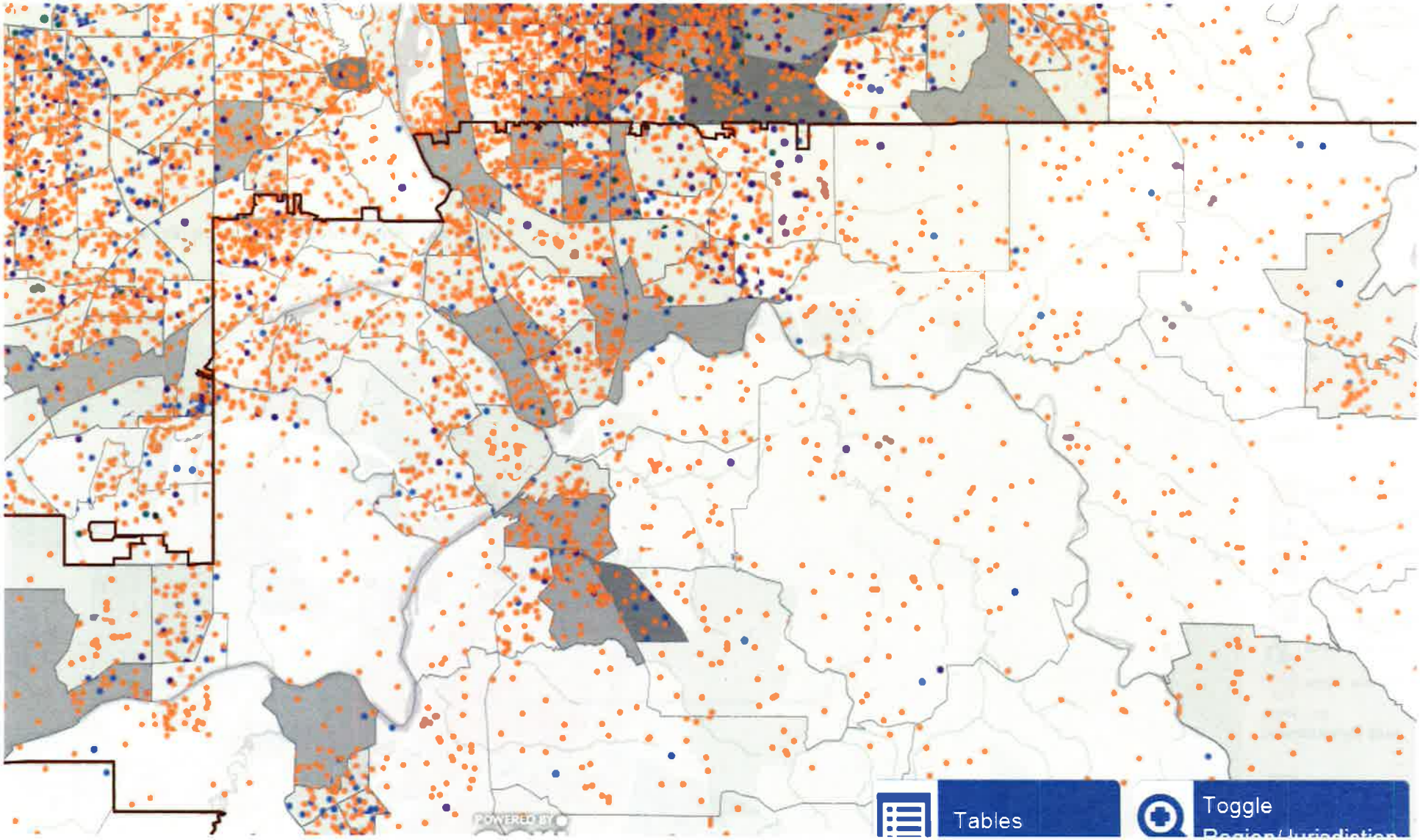
Housing Choice Voucher map with race/ethnicity dot density map and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Darker areas have higher concentrations of Voucher Units

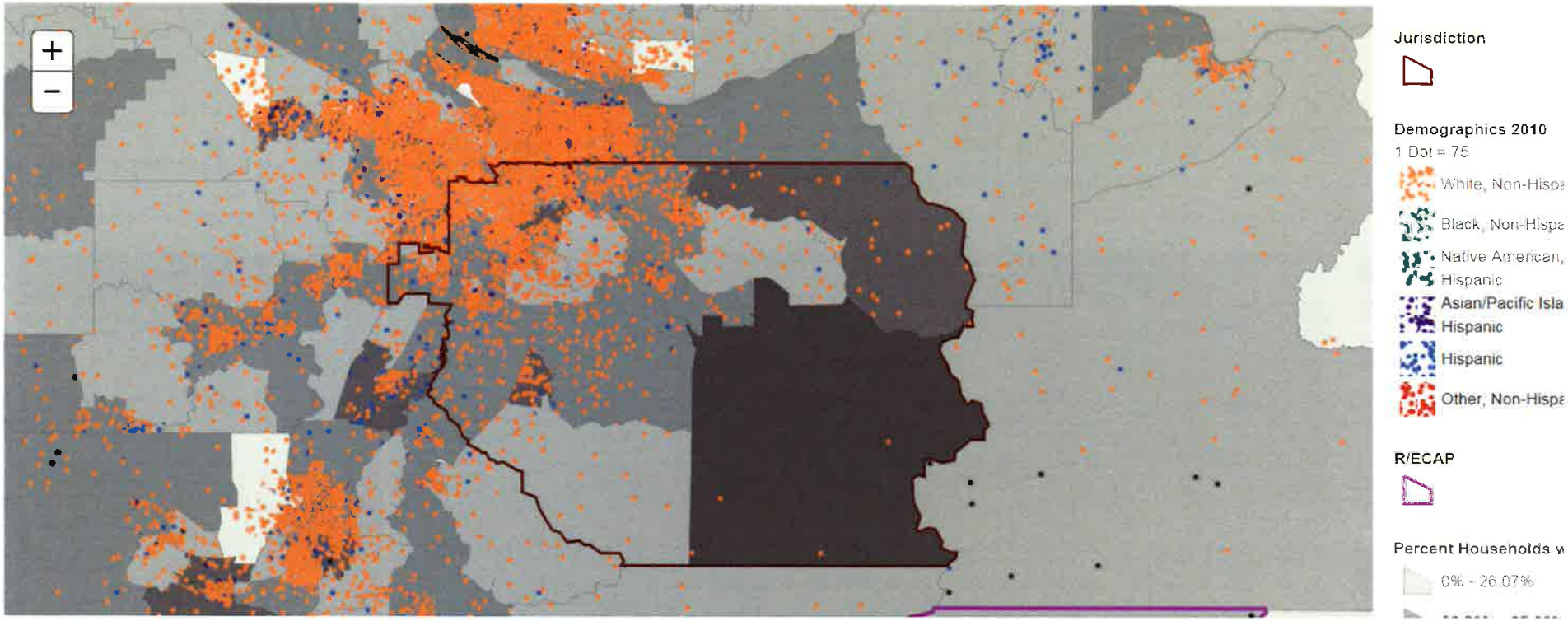
Map 6 ZOOM – Clackamas County Northwest County



Map 7 - Housing Burden and Race/Ethnicity (Housing Burden and Race/Ethnicity)

Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

Clackamas County, OR (419005) Jurisidiction



Darker shaded areas have higher percentages of households with housing burdens.

Lighter areas have less housing burdens

Map 8 - Housing Burden and National Origin (Housing Burden and National Origin)

Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

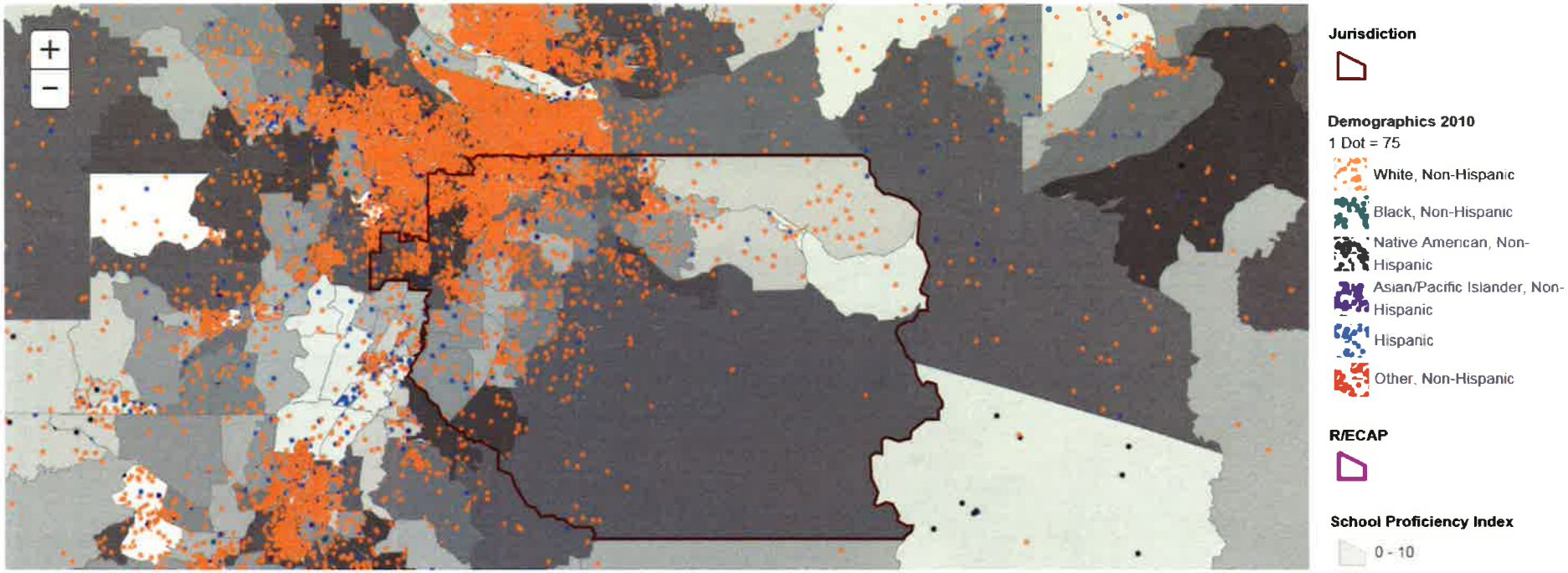
Clackamas County, OR (419005) Jurisidiction

The darker shaded areas have higher housing burdens

Map 9 - Demographics and School Proficiency (School Proficiency and Race/Ethnicity)

School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Darker areas have higher school proficiency

School proficiency is based on testing of 4th grade students

Map 9 - Demographics and School Proficiency (School Proficiency and National Origin)

School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

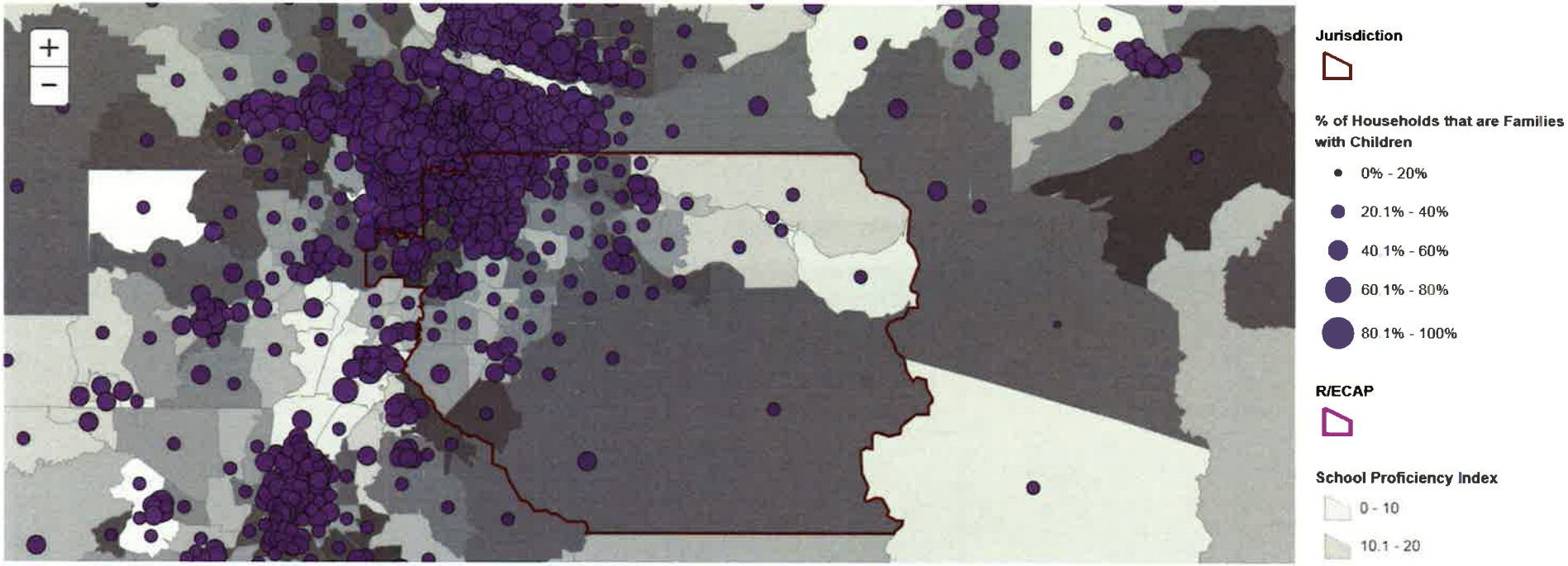
Darker areas have more proficient schools. Lighter areas have less proficient schools.

School proficiency is based on testing of 4th grade students

Map 9 - Demographics and School Proficiency (School Proficiency and Family Status)

School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



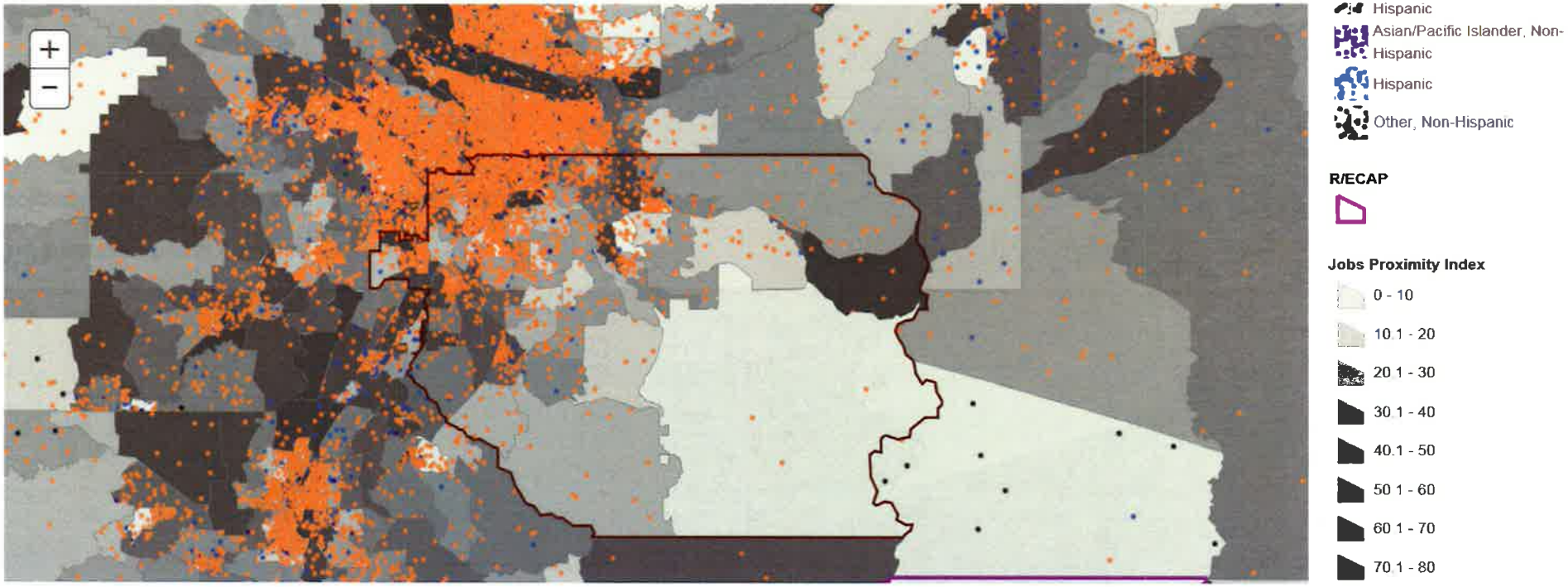
Darker areas have better school proficiency

School proficiency is based on testing of 4th grade students

Map 10 - Demographics and Job Proximity (Job Proximity and Race/Ethnicity)

Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



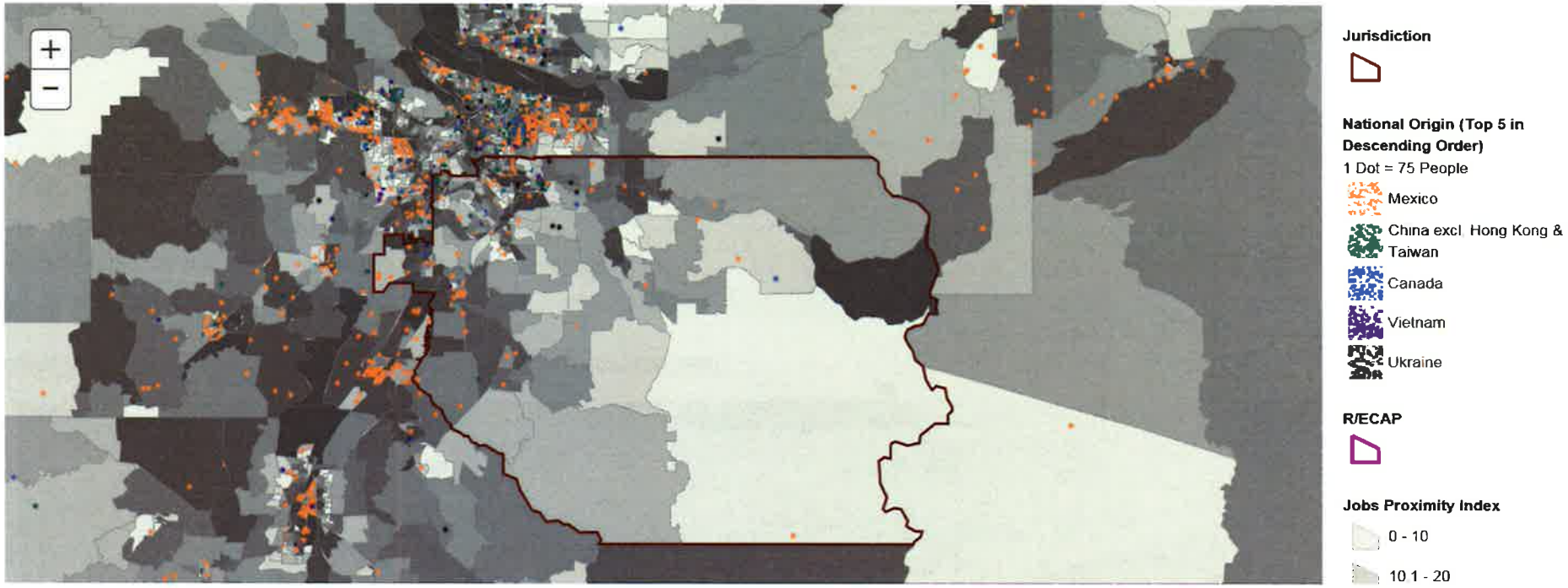
Darker areas have greater market engagement (closer proximity to jobs). Lighter areas have lower market engagement.

Market engagement is proximity to all job locations in the CBSA

Map 10 - Demographics and Job Proximity (Job Proximity and National Origin)

Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Darker areas have greater market engagement (closer proximity to jobs).

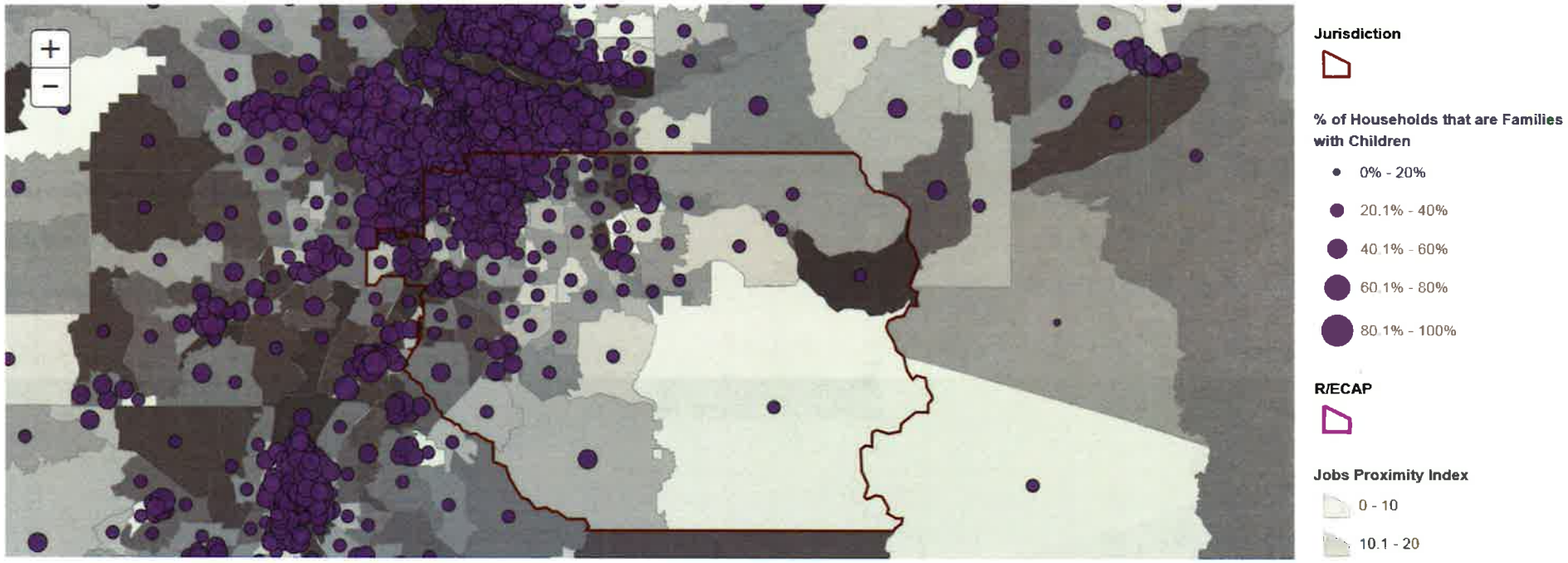
Lighter areas have lower market engagement.

Market engagement is proximity to all job locations in the CBSA

Map 10 - Demographics and Job Proximity (Job Proximity and Family Status)

Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Darker areas have greater market engagement (closer proximity to jobs).

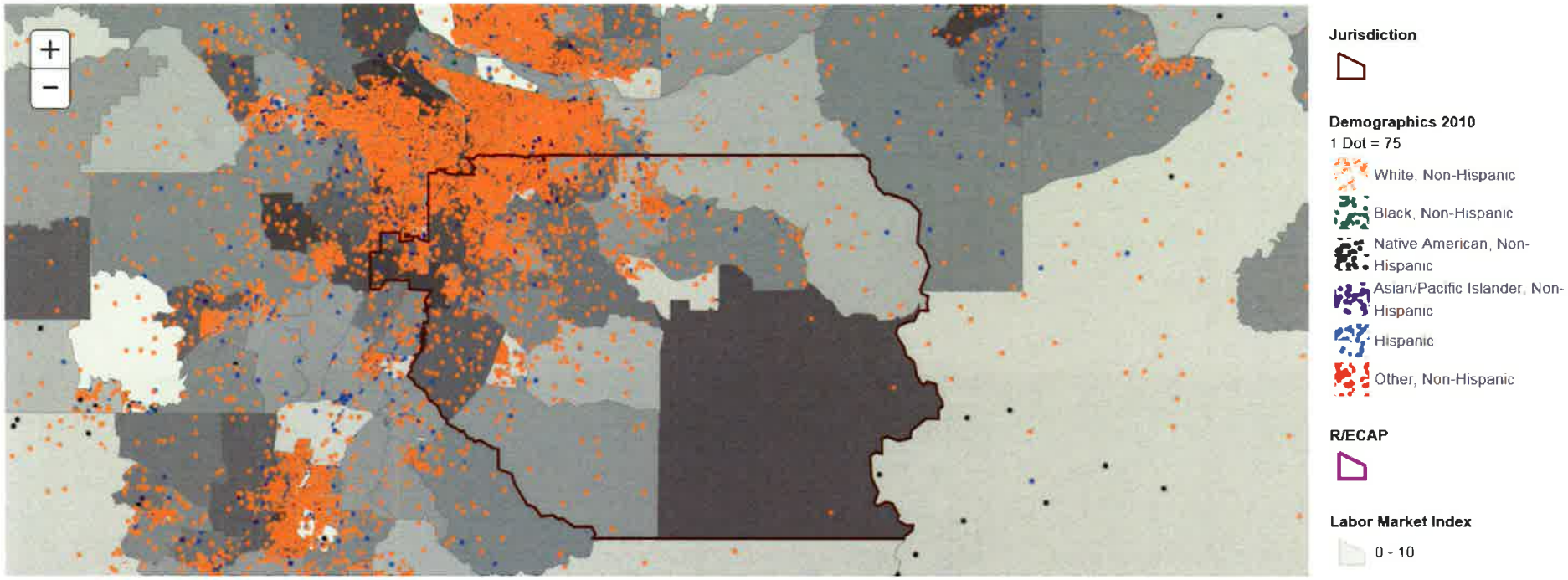
Lighter areas have lower market engagement.

Market engagement is proximity to all job locations in the CBSA

Map 11 - Demographics and Labor Market (Labor Market and Race/Ethnicity)

Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

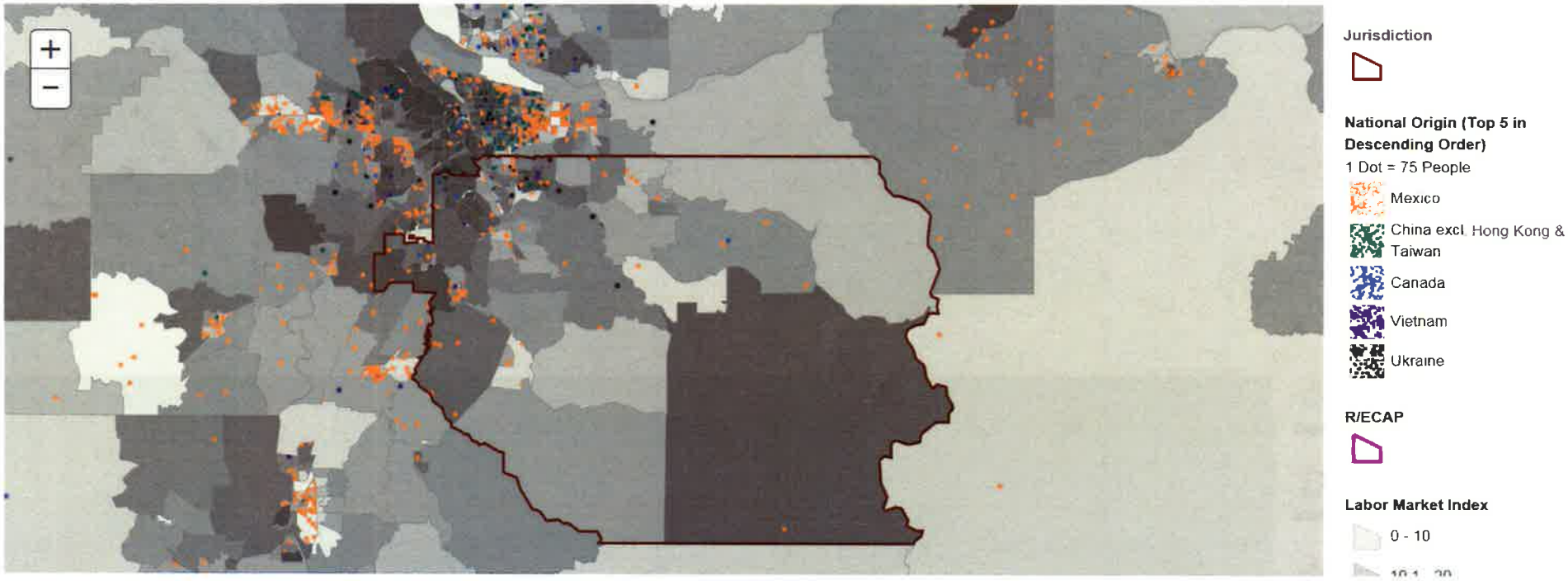
Clackamas County, OR (419005) Jurisidiction



Map 11 - Demographics and Labor Market (Labor Market and National Origin)

Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

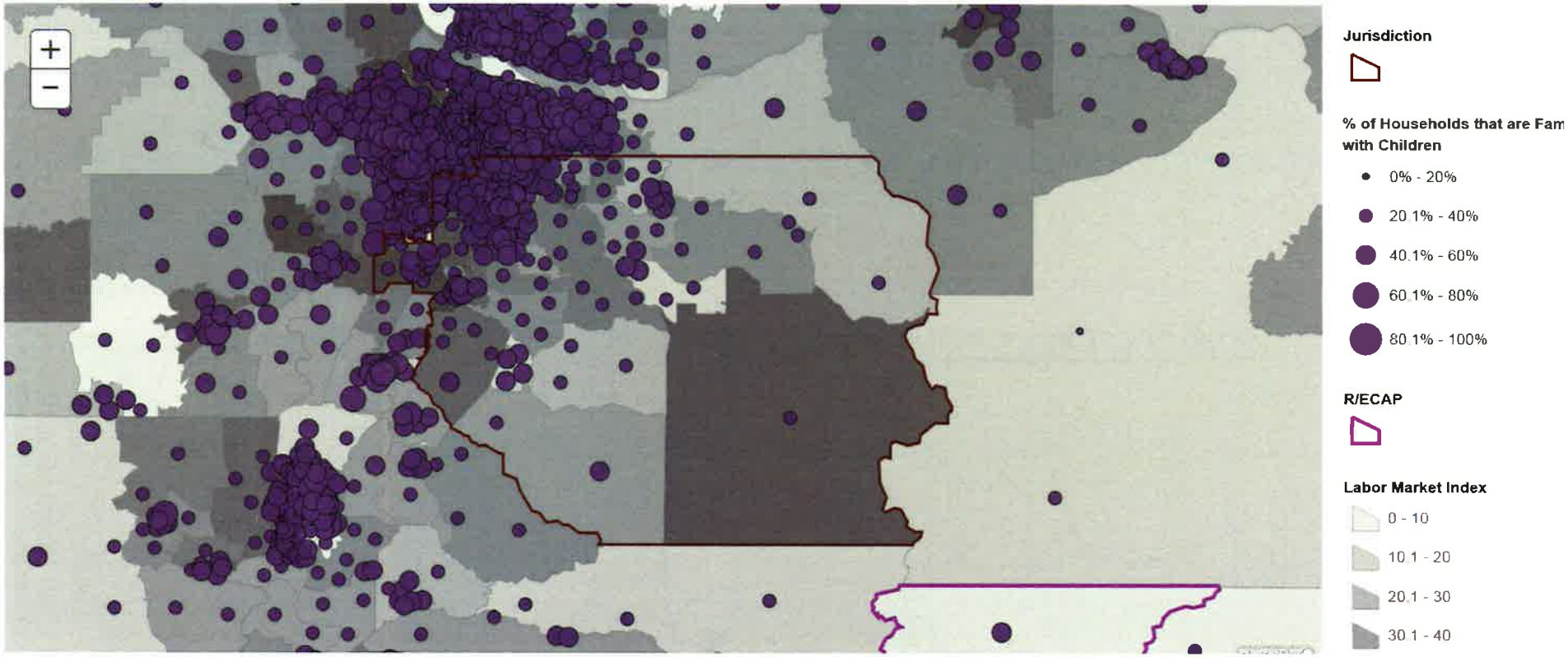
Clackamas County, OR (419005) Jurisidiction



Map 11 - Demographics and Labor Market (Labor Market and Family Status)

Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

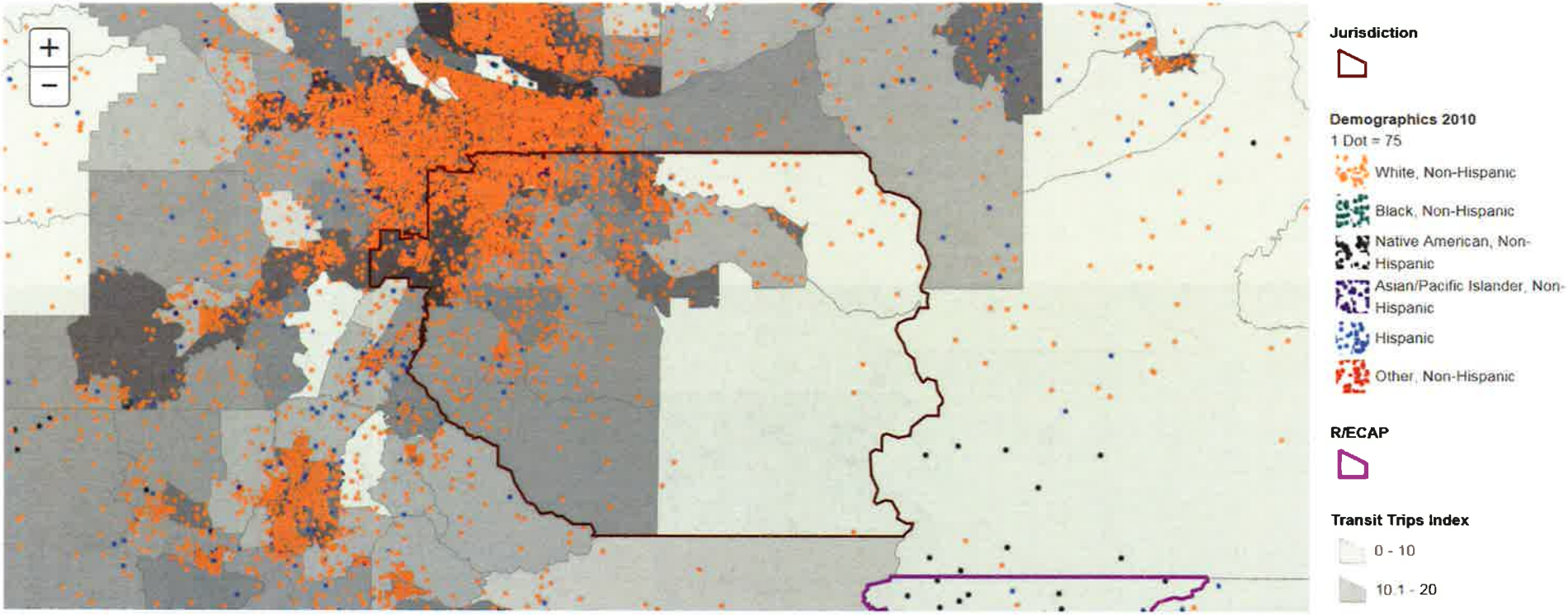
Clackamas County, OR (419005) Jurisidiction



Map 12 - Demographics and Transit Trips (Transit Trips and Race/Ethnicity)

Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

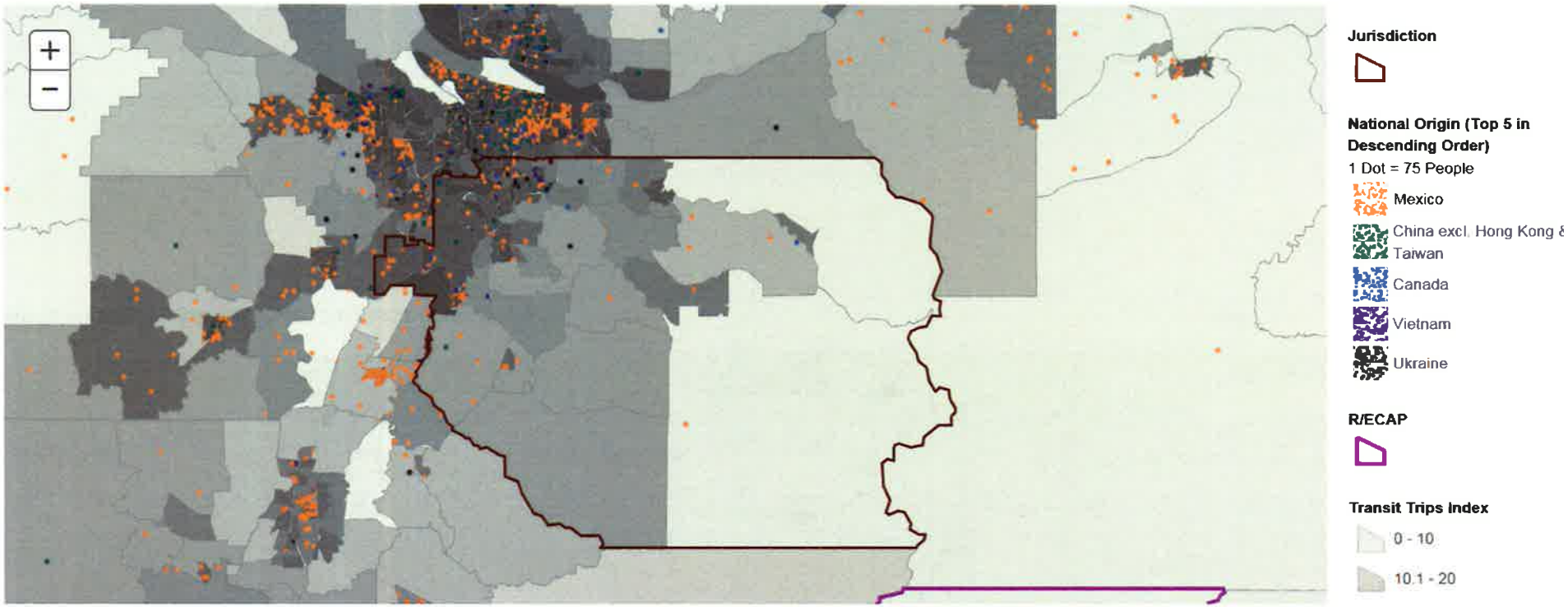


Darker areas have greater access to transit

Map 12 - Demographics and Transit Trips (Transit Trips and National Origin)

Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

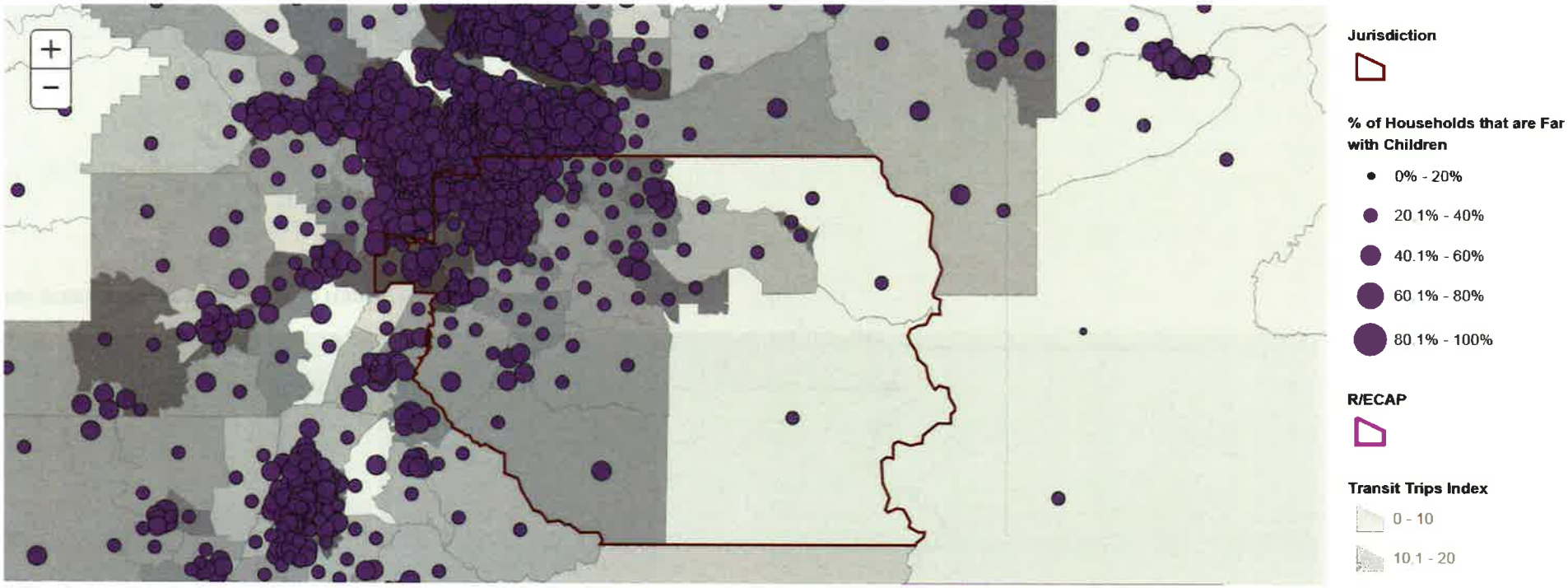


Darker areas have greater access to transit

Map 12 - Demographics and Transit Trips (Transit Trips and Family Status)

Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

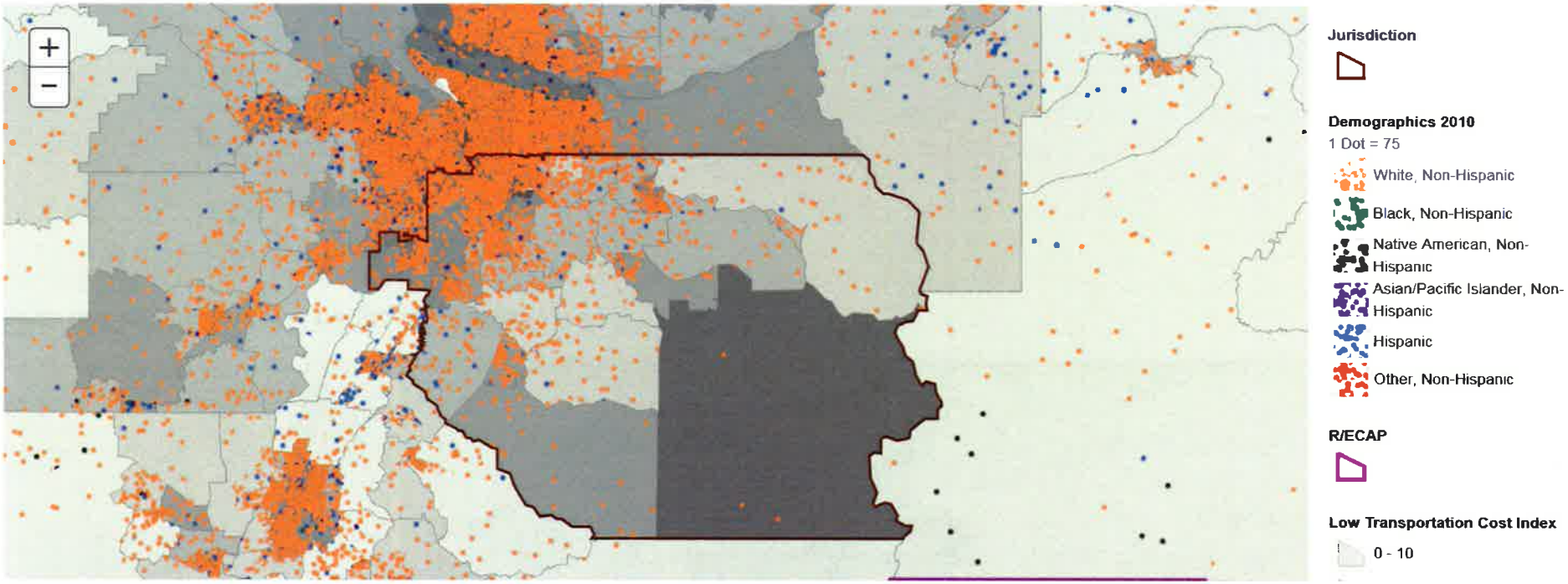


Darker areas have greater access to transit opportunities

Map 13 - Demographics and Low Transportation Cost (Low Transportation Cost and Race/Ethnicity)

Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

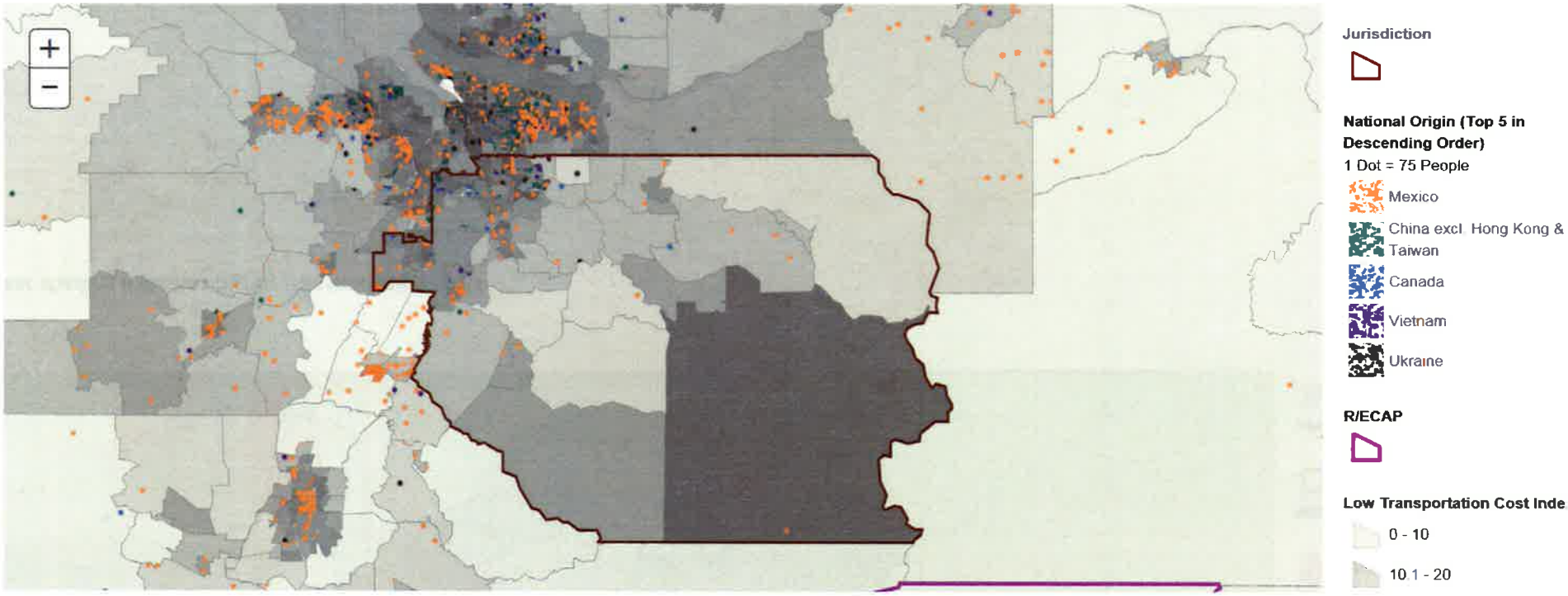


Darker shading indicates higher transportation costs

Map 13 - Demographics and Low Transportation Cost (Low Transportation Cost and National Origin)

Low Transportation Cost with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Darker shading indicates higher transportation costs

Map 13 - Demographics and Low Transportation Cost (Low Transportation Cost and Family Status)

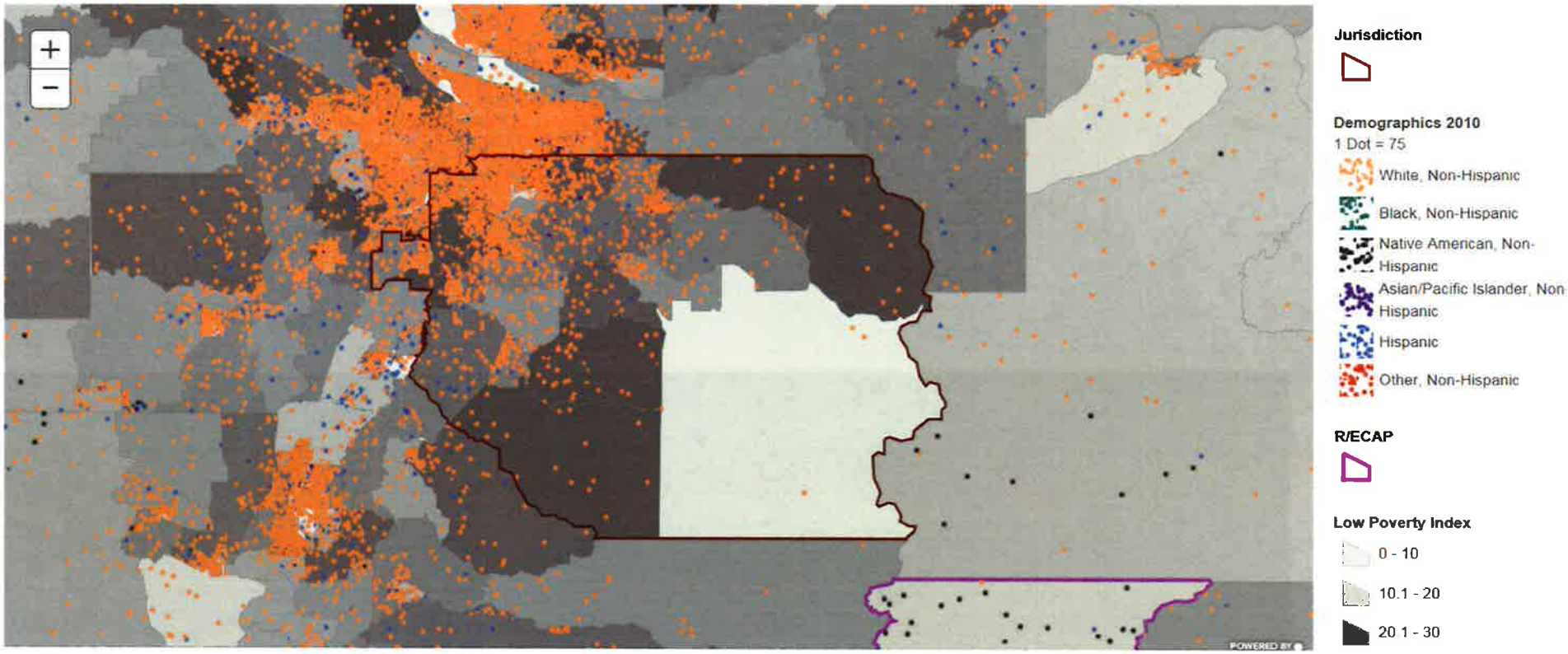
Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

Map 14 - Demographics and Poverty (Poverty and Race/Ethnicity)

Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

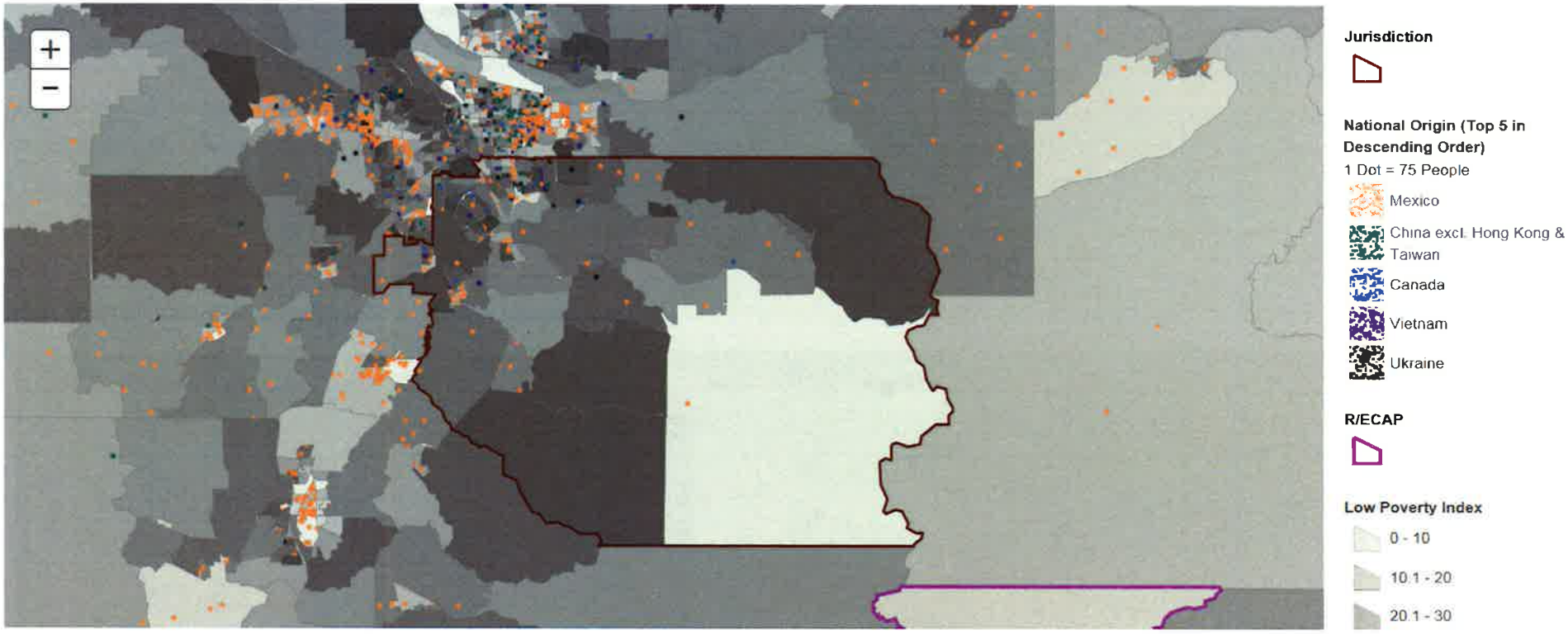


Darker areas indicate a higher likelihood of living in poverty

Map 14 - Demographics and Poverty (Poverty and National Origin)

Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction

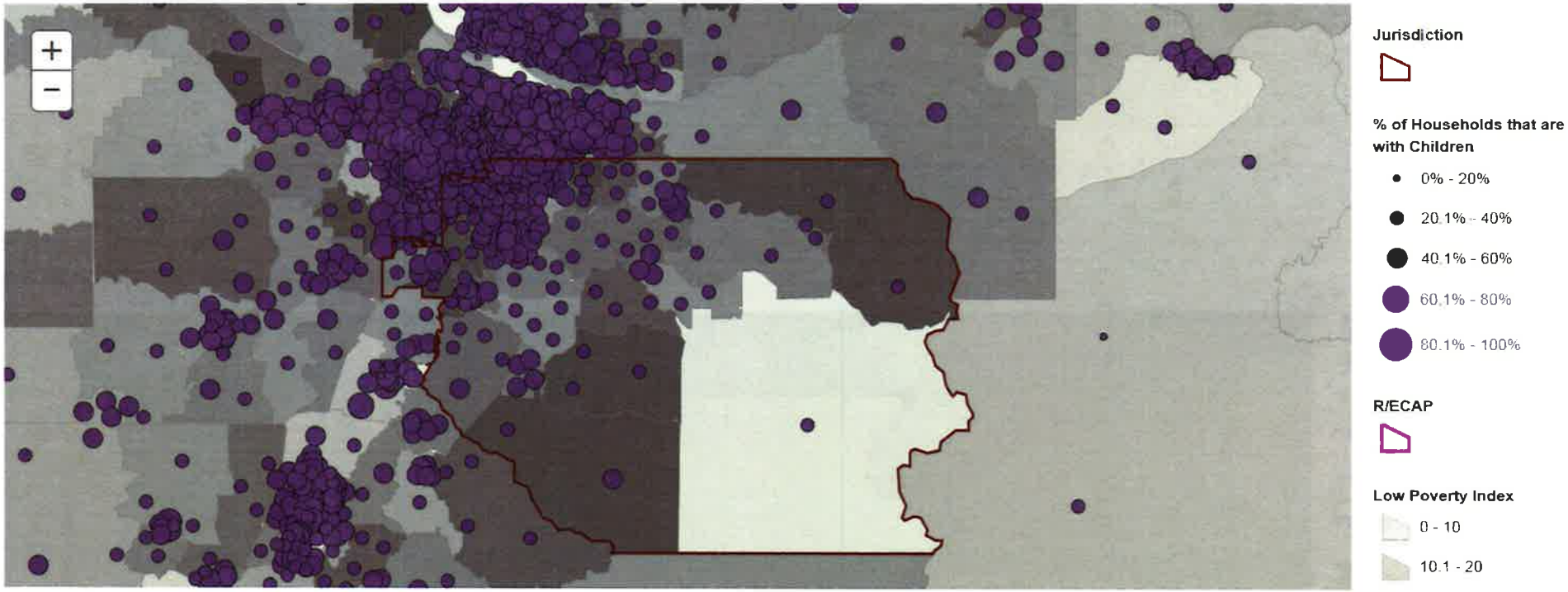


Darker areas indicate a higher likelihood of living in poverty

Map 14 - Demographics and Poverty (Poverty and Family Status)

Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Darker areas indicate a higher likelihood of living in poverty

Map 15 - Demographics and Environmental Health (Environmental Health and Race/Ethnicity)

Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

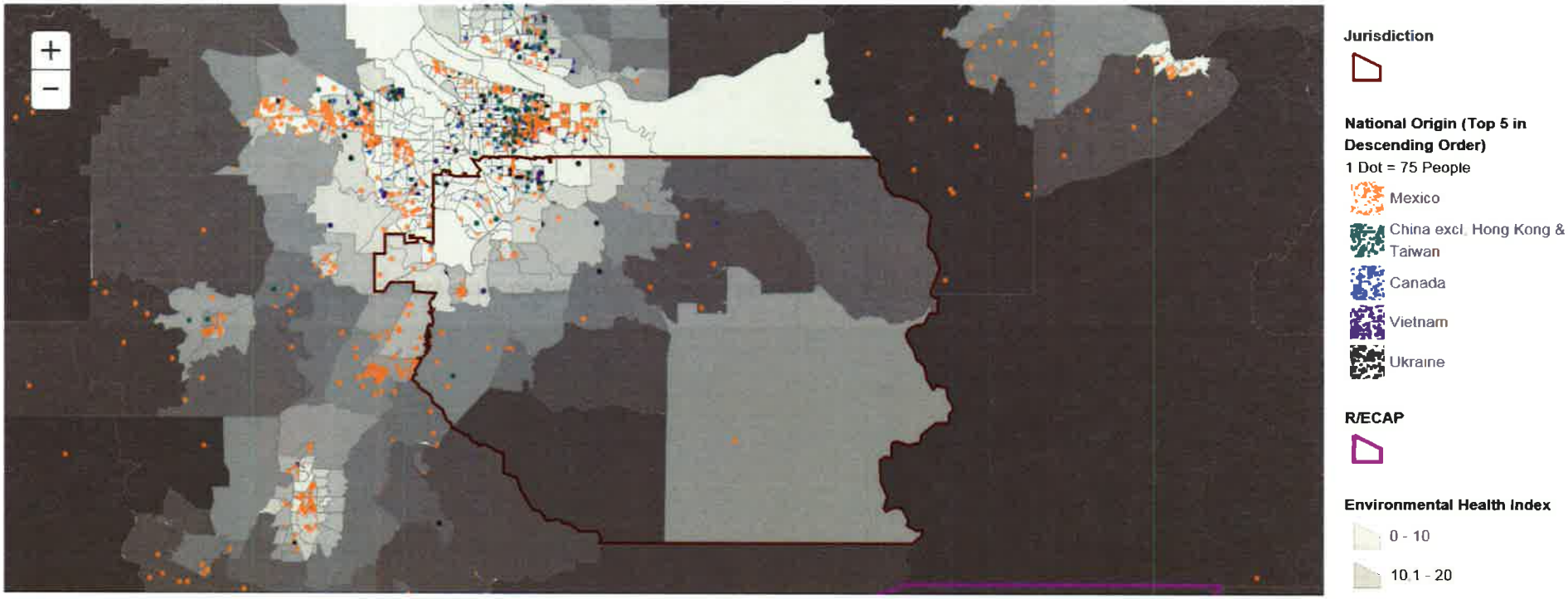
Clackamas County, OR (419005) Jurisidiction

Environmental Health index based on air quality only. Darker areas have less exposure to air pollution.

Map 15 - Demographics and Environmental Health (Environmental Health and National Origin)

Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Environmental Health index based on air quality only. Darker areas have less exposure to air pollution.

Map 15 - Demographics and Environmental Health (Environmental Health and Family Status)

Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

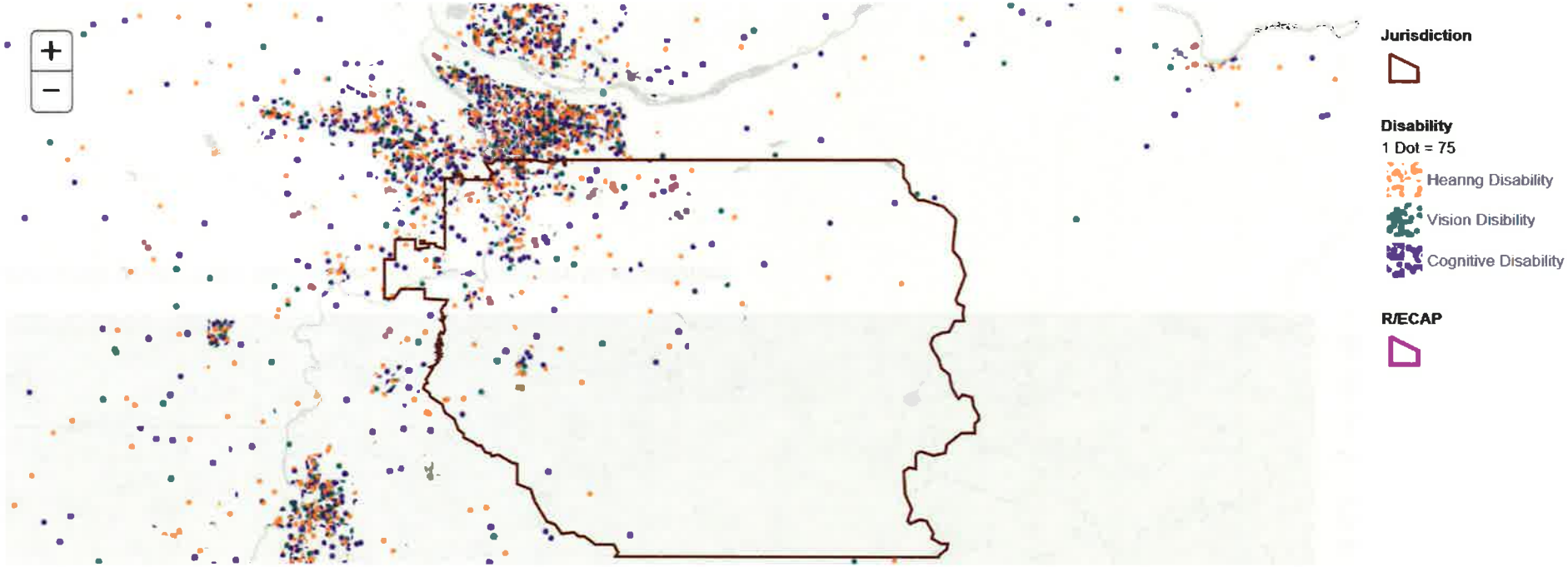
Clackamas County, OR (419005) Jurisidiction

Environmental Health Index: Darker areas have less exposure to air pollution.

Map 16 - Disability by Type (Hearing, Vision and Cognitive Disability)

Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction

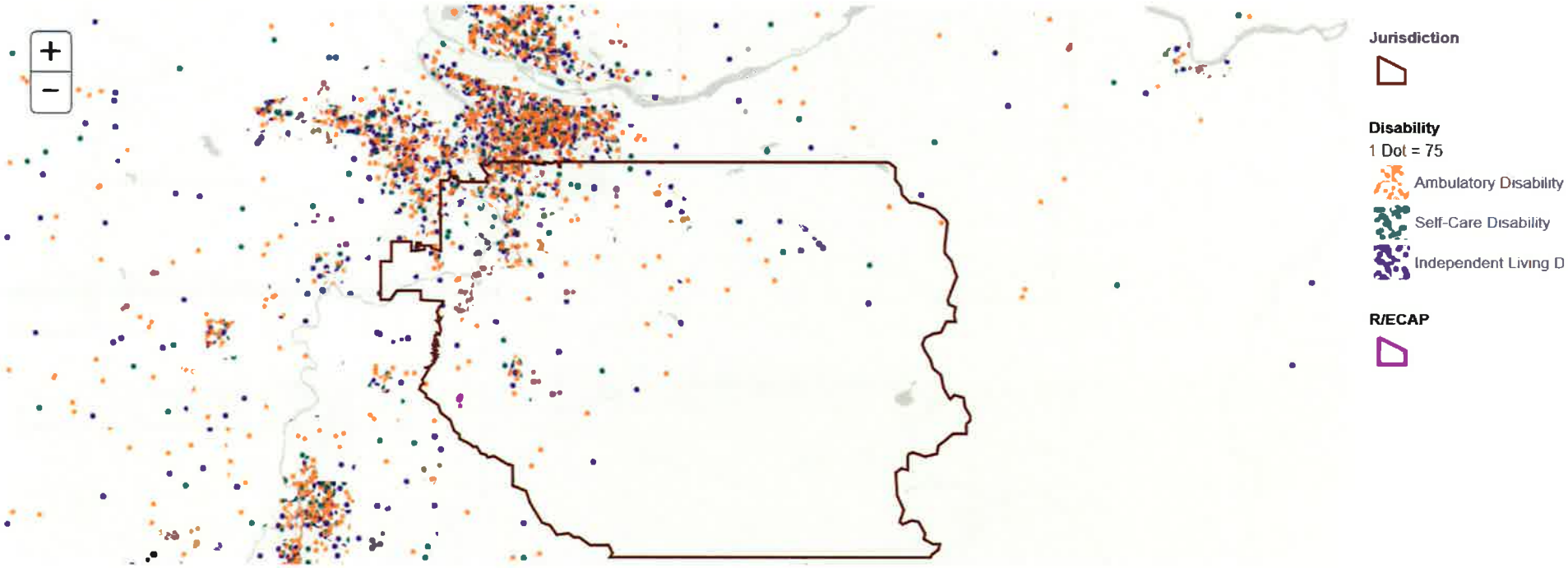
Clackamas County, OR (419005) Jurisidiction



Map 16 - Disability by Type (Ambulatory, Self-Care and Independent Living Disability)

Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction

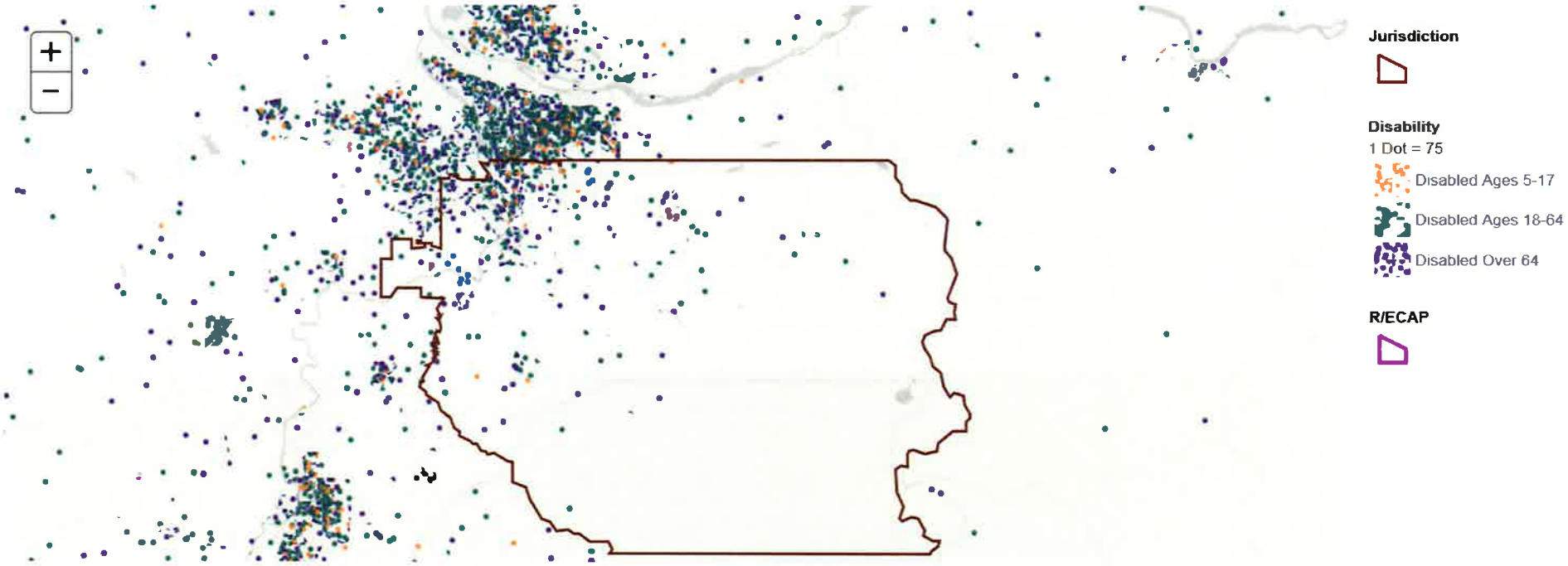
Clackamas County, OR (419005) Jurisidiction



Map 17 - Disability by Age Group (Disability by Age Group)

All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Clackamas County, OR (419005) Jurisidiction



Green dots represent disabled persons age 18 to 64

Table 1 - Demographics

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction			(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region		
Race/Ethnicity		#	%		#	%
White, Non-Hispanic		319,048	84.48		1,698,126	76.29
Black, Non-Hispanic		2,790	0.74		60,589	2.72
Hispanic		29,197	7.73		241,844	10.86
Asian or Pacific Islander, Non-Hispanic		14,485	3.84		135,485	6.09
Native American, Non-Hispanic		2,347	0.62		15,408	0.69
Other, Non-Hispanic		446	0.12		3,730	0.17
National Origin	**Country**			**Country**		
#1 country of origin	Mexico	9,232	2.57	Mexico	81,996	3.68
#2 country of origin	China excl. Hong Kong & Taiwan	1,704	0.48	Vietnam	22,576	1.01
#3 country of origin	Canada	1,493	0.42	Ukraine	14,261	0.64
#4 country of origin	Vietnam	1,449	0.40	China excl. Hong Kong & Taiw	12,828	0.58
#5 country of origin	Ukraine	1,361	0.38	Canada	10,400	0.47
#6 country of origin	Korea	1,156	0.32	India	10,150	0.46
#7 country of origin	Philippines	1,044	0.29	Korea	9,743	0.44
#8 country of origin	Russia	978	0.27	Philippines	9,286	0.42
#9 country of origin	Germany	950	0.26	Russia	8,811	0.40
#10 country of origin	India	601	0.17	Germany	5,855	0.26
Limited English Proficiency (LEP) Language	**Language**			**Language**		
#1 LEP Language	Spanish	8,408	2.45	Spanish	78,496	3.53
#2 LEP Language	Chinese	1,282	0.37	Vietnamese	17,009	0.76
#3 LEP Language	Vietnamese	1,102	0.32	Russian	12,474	0.56
#4 LEP Language	Russian	820	0.24	Chinese	11,762	0.53
#5 LEP Language	Korean	624	0.18	Other Slavic langua	5,243	0.24
#6 LEP Language	Other Slavic Language	502	0.15	Korean	4,689	0.21
#7 LEP Language	Arabic	380	0.11	Africanlang	3,191	0.14
#8 LEP Language	French	263	0.08	Other Indo-European	3,189	0.14
#9 LEP Language	Persian	233	0.07	Other Asian languag	2,919	0.13
#10 LEP Language	German	176	0.05	Japanese	2,780	0.12
Disability Type						
Hearing difficulty		14,405	4.00		77,629	3.69
Vision difficulty		5,906	1.64		41,906	1.99
Cognitive difficulty		16,721	4.64		110,762	5.27
Ambulatory difficulty		21,985	6.10		125,867	5.99

Self-care difficulty	9,217	2.56	51,875	2.47
Independent living difficulty	14,826	4.11	91,404	4.35
Sex				
Male	185,692	49.17	1,099,122	49.38
Female	191,952	50.83	1,126,887	50.62
Age				
Under 18	89,436	23.68	527,233	23.69
18-64	236,665	62.67	1,446,558	64.98
65+	51,543	13.65	252,218	11.33
Family Type				
Families with children	43,819	43.24	256,004	46.46

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 2 - Demographic Trends

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction						(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region					
	1990		2000		2010		1990		2000		2010	
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	266,495	94.61	303,615	89.07	319,048	84.48	1,366,608	89.68	1,573,518	81.61	1,698,126	76.29
Black, Non-Hispanic	1,093	0.39	3,222	0.95	2,790	0.74	40,508	2.66	61,331	3.18	60,589	2.72
Hispanic	7,148	2.54	16,840	4.94	29,197	7.73	50,495	3.31	142,752	7.40	241,844	10.86
Asian or Pacific Islander, Non-Hispanic	4,782	1.70	11,334	3.32	14,485	3.84	50,832	3.34	110,788	5.75	135,485	6.09
Native American, Non-Hispanic	1,789	0.64	4,473	1.31	2,347	0.62	12,813	0.84	28,874	1.50	15,408	0.69
National Origin												
Foreign-born	11,611	4.12	24,378	7.15	31,984	8.42	88,168	5.79	208,423	10.81	281,081	12.63
LEP												
Limited English Proficiency	5,104	1.81	13,148	3.86	17,239	4.54	46,263	3.04	128,392	6.66	161,051	7.23
Sex												
Male	138,285	49.10	168,701	49.50	185,692	49.17	746,461	48.99	956,567	49.62	1,099,122	49.38
Female	143,343	50.90	172,134	50.50	191,952	50.83	777,175	51.01	971,314	50.38	1,126,887	50.62
Age												
Under 18	75,243	26.72	91,429	26.83	89,436	23.68	392,607	25.77	503,722	26.13	527,233	23.69
18-64	174,256	61.87	211,712	62.12	236,665	62.67	948,677	62.26	1,224,312	63.51	1,446,558	64.98
65+	32,129	11.41	37,694	11.06	51,543	13.65	182,352	11.97	199,847	10.37	252,218	11.33
Family Type												
Families with children	36,228	46.31	34,894	47.19	43,819	43.24	187,192	46.80	202,898	49.34	256,004	46.46

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 3 - Racial/Ethnic Dissimilarity Trends

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction			(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region		
Racial/Ethnic Dissimilarity Index	**1990**	**2000**	**2010**	**1990**	**2000**	**2010**
Non-White/White	13.49	18.96	26.23	28.76	27.82	31.79
Black/White	29.56	25.50	35.35	63.52	47.49	48.59
Hispanic/White	18.82	27.34	31.03	25.72	34.24	37.13
Asian or Pacific Islander/White	25.16	28.65	39.65	31.31	31.87	38.00

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Dissimilarity index: range from 0 to 100

Values	Description
<40	Low Segregation
40-54	Moderate Segregation
>55	High Segregation

Table 4 - R/ECAP Demographics

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction - HC Census TRACTS only				(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region		
R/ECAP Race/Ethnicity		#	%			#	%
Total Population in R/ECAPs		0	0.00			10,587	-
White, Non-Hispanic		0	0.00			3,687	34.83
Black, Non-Hispanic		0	0.00			391	3.69
Hispanic		0	0.00			5,679	53.64
Asian or Pacific Islander, Non-Hispanic		0	0.00			462	4.36
Native American, Non-Hispanic		0	0.00			69	0.65
Other, Non-Hispanic		0	0.00			25	0.24
R/ECAP Family Type							
Total Families in R/ECAPs		0	0.00			2,259	-
Families with children		0	0.00			1,422	62.95
R/ECAP National Origin	**Country**				**Country**		
Total Population in R/ECAPs		0	-			10,587	-
#1 country of origin	Null	0	0.00		Mexico	2,770	26.16
#2 country of origin	Null	0	0.00		Guatemala	259	2.45
#3 country of origin	Null	0	0.00		Ukraine	200	1.89
#4 country of origin	Null	0	0.00		Laos	116	1.1
#5 country of origin	Null	0	0.00		Vietnam	105	0.99
#6 country of origin	Null	0	0.00		Russia	100	0.94
#7 country of origin	Null	0	0.00		Other Eastern Europe	56	0.53
#8 country of origin	Null	0	0.00		Romania	49	0.46
#9 country of origin	Null	0	0.00		Ecuador	41	0.39
#10 country of origin	Null	0	0.00		Thailand	41	0.39

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 4 Minority/LMI Demographics

	Clackamas County Jurisdiction		Milwaukie		North Clackamas		North Clackamas		North Clackamas	
Clackamas County 2010 Data				Census Tract 212	Census Tract 216.01		Census Tract 216.02		Census Tract 222.01	
Minority/LMI Census Tract Race/Ethnicity	#	%	#	%	#	%	#	%	#	%
Total Population in Minority/LMI Census T	-	-	3,859	100.00	5,951	100.00	4,924	100.00	4,779	100.00
White, Non-Hispanic	319,048	84.48	3,249	84.20	4,331	72.80	3,704	75.20	2,821	59.00
Black, Non-Hispanic	2,790	0.74	55	1.40	110	1.80	89	1.80	168	3.50
Hispanic	29,197	7.73	360	9.30	1,013	17.00	752	15.30	1,338	28.00
Asian or Pacific Islander, Non-Hispanic	14,485	3.84	68	1.80	225	3.80	164	3.30	268	5.60
Native American, Non-Hispanic	2,347	0.62	31	0.80	63	1.10	30	0.60	35	0.70
Other, Non-Hispanic	446	0.12	96	2.50	209	3.50	185	3.80	149	3.10
Minority/LMI Census Tract Family Type										
Total Families in Minority/LMI Census Tract	-	-	879	46.50	1,346	57.60	1,284	67.80	990	44.40
Families with children	43,819	43.24	325	17.20	683	29.20	577	30.40	488	21.90

	Clackamas County Jurisdiction		Canby		Canby		East Clackamas				
				Census Tract 229.04	Census Tract 229.07		Census Tract 9800		Minority/LMI Census Tract Total		Census
Minority/LMI Census Tract Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	Tracts
Total Population in Minority/LMI Census T	-	-	3,611	100.00	4,227	100.00	297	100.00	27,648	100.00	Not
White, Non-Hispanic	319,048	84.48	2,677	74.10	2,459	58.20	197	66.30	19,438	70.30	Block Groups
Black, Non-Hispanic	2,790	0.74	9	0.20	11	0.30	21	7.10	463	1.60	
Hispanic	29,197	7.73	766	21.20	1,646	38.90	32	10.80	5,907	21.40	
Asian or Pacific Islander, Non-Hispanic	14,485	3.84	49	1.40	21	0.50	18	6.10	813	3.00	
Native American, Non-Hispanic	2,347	0.62	34	0.90	20	0.50	10	3.40	223	0.80	
Other, Non-Hispanic	446	0.12	76	2.10	70	1.70	19	6.40	804	3.00	
Minority/LMI Census Tract Family Type											
Total Families in Minority/LMI Census Tract	-	-	892	69.90	1,063	77.70	14	38.90	6,468	100.00	
Families with children	43,819	43.24	511	40.00	610	44.60	5	13.90	3,199	49.46	

Table 5 - Publicly Supported Housing Units by Program Category

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	
Housing Units	**#**	**%**
Total housing units	157,887	-
Public Housing	548	0.35
Project-based Section 8	390	0.25
Other Multifamily	222	0.14
HCV Program	1,627	1.03

Note 1: Data Sources: Decennial Census; APSH

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Table 6 - Publicly Supported Housing Residents by Race/Ethnicity

	Race/Ethnicity							
(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	456	87.86	23	4.43	30	5.78	6	1.16
Project-Based Section 8	312	92.31	1	0.30	14	4.14	9	2.66
Other Multifamily	204	98.08	0	0.00	2	0.96	2	0.96
HCV Program	1,268	88.80	53	3.71	68	4.76	9	0.63
0-30% of AMI	95	73.08	0	0.00	25	19.23	0	0.00
0-50% of AMI	220	72.13	0	0.00	25	8.20	10	3.28
0-80% of AMI	395	75.24	0	0.00	50	9.52	25	4.76
(Clackamas County, OR CDBG, HOM	319,048	84.48	2,790	0.74	29,197	7.73	14,485	3.84

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

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Table 6 - Publicly Supported Housing Residents by Race/Ethnicity

	Race/Ethnicity								
(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander		
Housing Type	#	%	#	%	#	%	#	%	
Public Housing	477	90.34	31	5.87	34	6.44	29	5.49	1 other & 2 declined
Project-Based Section 8	312	92.31	1	0.30	14	4.14	9	2.66	
Other Multifamily	204	98.08	0	0.00	2	0.96	2	0.96	
HCV Program	1,313	90.93	87	6.02	96	6.65	61	4.22	1 Other & 5 declined
0-30% of AMI	95	73.08	0	0.00	25	19.23	0	0.00	
0-50% of AMI	220	72.13	0	0.00	25	8.20	10	3.28	
0-80% of AMI	395	75.24	0	0.00	50	9.52	25	4.76	
(Clackamas County, OR CDBG, HOM	319,048	84.48	2,790	0.74	29,197	7.73	14,485	3.84	

Note 1: Data Sources: Decennial Census; APSH; CHAS
Note 2: #s presented are numbers of households not individuals.
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

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Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
Public Housing								
R/ECAP tracts								
Non R/ECAP tracts	530	22.18	34.77	87.86	4.43	5.78	1.16	41.73
Project-based Section 8								
R/ECAP tracts								
Non R/ECAP tracts	361	38.98	29.38	92.31	0.30	4.14	2.66	31.36
Other HUD Multifamily								
R/ECAP tracts								
Non R/ECAP tracts	218	72.43	32.71	98.08	0.00	0.96	0.96	
HCV Program								
R/ECAP tracts								
Non R/ECAP tracts	1,534	22.13	26.13	88.81	3.71	4.76	0.63	39.07

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

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Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
Public Housing								
R/ECAP tracts								
Non R/ECAP tracts	528	23.67	50.38	90.34	5.87	6.44	2.65	40.91
Project-based Section 8								
R/ECAP tracts								
Non R/ECAP tracts	361	38.98	29.38	92.31	0.30	4.14	2.66	31.36
Other HUD Multifamily								
R/ECAP tracts								
Non R/ECAP tracts	218	72.43	32.71	98.08	0.00	0.96	0.96	
HCV Program								
R/ECAP tracts								
Non R/ECAP tracts	1,444	28.25	46.47	90.93	6.02	6.65	1.66	41.69

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all
Note 2: Data Sources: APSH
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

2016 UPDATED DEMOGRAPHICS BY HACC

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Public Housing

(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	Public Housing Race/Ethnicity (%)		Public Housing Households with Children (%)				
Developments				HUD Provided Data		Census Tract Data	Difference
Hillside Manor	White	93	1	93	0	86.15%	6.85
DATA UPDATED BY HACC	Black	4		5		2.05%	2.95
	Hispanic	4		2		5.98%	3.98
	Asian	0		0		1.61%	
Scattered Sites	White	92.0	72.5	82	82	82.96%	
Clackamas County	Black	2.2		1		0.68%	
	Hispanic	11.6		11		11.07%	
	Asian	5.1		4		1.39%	
Oregon City View Manor	White	92.9	44.9	83	43	89.97%	
	Black	5.1		5		0.49%	
	Hispanic	7.1		9		4.81%	
	Asian	3.1		1		1.19%	
Clackamas Heights	White	85.3	46.3	86	42	89.97%	3.97
	Black	11.6		9		0.49%	8.51
	Hispanic	3.2		3		4.81%	1.81
	Asian	3.2		1		1.19%	
Hillside Park	White	87.6	27.8	87	27	86.15%	0.85
	Black	8.2		6		2.05%	3.95
	Hispanic	4.1		4		5.98%	1.98
	Asian	1.0		1		1.61%	

Project-Based Section 8

(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	Project-Based Race/Ethnicity (%)		Project-Based Households with Children (%)	Census Tract Data		
Developments						
Ikoi So Terrace	White	94	0	84.32%	Seniors	
Oak Grove	Black	0		0.83%		
	Hispanic	0		9.21%		
	Asian	6		1.84%		
Ridings Terrace I	White	84	85	83.14%	Families	
Molalla	Black	0		0.36%		
	Hispanic	11		13.19%		
	Asian	0		0.73%		
Rosewood Terrace	White	92	73	86.76%	Families	5.24
Oregon City	Black	0		0.36%		
	Hispanic	8		7.96%		
	Asian	0		0.94%		
Oregon City Terrace	White	86	62	86.76%	Families	0.76
Oregon City	Black	2		0.36%		1.64
	Hispanic	7		7.96%		0.96
	Asian	2		0.94%		1.06
Ridings Terrace II	White	77	54	83.14%	Families	6.17
Molalla	Black	0		0.36%		
	Hispanic	15		13.19%		1.81
	Asian	0		0.73%		
Carriage Court	White	97	0	74.13%	Seniors	
Canby	Black	0		0.25%		
	Hispanic	3		21.21%		
	Asian	0		1.08%		
Willamalane	White	90	42	78.12%	Families	11.9
Milwaukie	Black	3		1.28%		1.72
	Hispanic	7		14.28%		
	Asian	0		2.02%		
300 Main	White	96	0	90.61%	Seniors	
Estacada	Black	0		0.42%		
	Hispanic	4		5.43%		

	Asian	0		0.92%		
Seneca Terrace	White	86	69	75.22%	Families	10.8
Milwaukie	Black	0		1.81%		
	Hispanic	4		15.27%		11.3
	Asian	11		3.11%		7.89
Hollyfield Village	White	100	0	89.92%	Disabled Seniors	
Lake Oswego	Black	0		0.39%		
	Hispanic	0		3.70%		
	Asian	0		3.49%		
Our Apartment	White	0	0	86.76%	Section 8 contract expired 2012	
Oregon City "Otter Lane"	Black	0		0.36%		
	Hispanic	0		7.96%		
	Asian	0		0.94%		
Cascade Meadows	White	85	0	72.78%	Seniors	
Milwaukie	Black	3		1.85%		
	Hispanic	3		17.02%		
	Asian	7		3.33%		

Other HUD Multifamily Assisted Housing

(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	Other Multifamily Race/Ethnicity (%)		Other Multifamily Households with Children (%)		
Developments				Census Tract Data	
Charleston Apartments	White	86	14	82.48%	MultiFam
Wilsonville	Black	0		0.68%	
	Hispanic	7		8.89%	
	Asian	0		3.81%	
Whispering Pines	White	97	0	90.61%	Seniors
Estacada	Black	0		0.42%	
	Hispanic	2		5.43%	
	Asian	2		0.92%	
Oakridge Park Apartments	White	95	0	82.93%	Seniors
Lake Oswego	Black	0		0.95%	

	Hispanic	0		5.57%	
	Asian	2		6.52%	
Meadowlark Apartments	White	100	0	86.88%	SMI housing
Oregon City	Black	0		0.76%	
	Hispanic	0		7.28%	
	Asian	0		1.89%	
Fisher Ridge Apartments	White	94	0	89.57%	MI housing 811
Oregon City	Black	0		0.40%	
	Hispanic	6		5.27%	
	Asian	0		0.93%	
Renaissance Court	White	95	0	82.48%	SMI housing
Wilsonville	Black	0		0.68%	
	Hispanic	0		8.89%	
	Asian	5		3.81%	
Creekside Woods	White	100	0	75.53%	Seniors
Wilsonville	Black	0		0.86%	
	Hispanic	0		13.74%	
	Asian	0		6.34%	

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 9 - Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction			(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region		
Households experiencing any of 4 housing problems*	**# with problems**	**# households**	**% with problems**	**# with problems**	**# households**	**% with problems**
Race/Ethnicity						
White, Non-Hispanic	49,570	131,065	37.82%	268,029	715,194	37.48
Black, Non-Hispanic	410	834	49.16%	12,342	22,301	55.34
Hispanic	3,860	6,890	56.02%	34,699	59,059	58.75
Asian or Pacific Islander, Non-Hispanic	1,900	4,353	43.65%	19,085	44,019	43.36
Native American, Non-Hispanic	360	673	53.49%	2,271	4,911	46.24
Other, Non-Hispanic	1,129	2,838	39.78%	8,479	19,078	44.44
Total	*57,230*	*146,665*	*39.02%*	*344,890*	*864,545*	*39.89*
Household Type and Size						
Family households, <5 people	29,120	87,884	33.13%	156,520	473,864	33.03
Family households, 5+ people	7,020	13,689	51.28%	41,790	77,100	54.20
Non-family households	21,090	45,105	46.76%	146,600	313,590	46.75
Households experiencing any of 4 Severe Housing Problems**	**# with severe problems**	**# households**	**% with severe problems**	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity						
White, Non-Hispanic	23,580	131,065	17.99%	125,408	715,194	17.53
Black, Non-Hispanic	215	834	25.78%	7,594	22,301	34.05
Hispanic	2,345	6,890	34.03%	21,449	59,059	36.32
Asian or Pacific Islander, Non-Hispanic	890	4,353	20.45%	9,940	44,019	22.58
Native American, Non-Hispanic	190	673	28.23%	1,185	4,911	24.13
Other, Non-Hispanic	699	2,838	24.63%	4,435	19,078	23.25
Total	*27,905*	*146,665*	*19.03%*	*169,990*	*864,545*	*19.66*

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The **four severe housing problems** are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and **cost burden greater than 50%**.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 10 - Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden*	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction			(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	20,800	131,065	15.87%	110,900	715,194	15.51
Black, Non-Hispanic	150	834	17.99%	6,685	22,301	29.98
Hispanic	1,395	6,890	20.25%	13,605	59,059	23.04
Asian or Pacific Islander, Non-Hispanic	735	4,353	16.88%	7,613	44,019	17.29
Native American, Non-Hispanic	180	673	26.75%	1,044	4,911	21.26
Other, Non-Hispanic	550	2,838	19.38%	3,844	19,078	20.15
Total	*23,810*	*146,665*	*16.23%*	*143,691*	*864,545*	*16.62*
Household Type and Size						
Family households, <5 people	10,945	87,884	12.45%	60,868	473,864	12.85
Family households, 5+ people	1,860	13,689	13.59%	10,314	77,100	13.38
Non-family households	10,995	45,105	24.38%	72,519	313,590	23.13

Note 1: Severe housing cost burden is defined as **greater than 50% of income.**

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details (www.hudexchange.info).

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	180	33.83	158	29.70	189	35.53	222	41.73
Project-Based Section 8	195	55.08	122	34.46	29	8.19	111	31.36
Other Multifamily	214	100.00	0	0.00	0	0.00	1	0.47
HCV Program	367	24.47	664	44.27	406	27.07	586	39.07

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	64.60	60.93	55.61	68.07	46.26	48.74	17.82
Black, Non-Hispanic	60.97	62.08	55.73	74.04	54.44	55.81	9.99
Hispanic	55.29	55.62	49.99	72.38	51.40	55.44	16.89
Asian or Pacific Islander, Non-Hispanic	70.65	68.03	66.21	72.49	50.19	48.99	9.69
Native American, Non-Hispanic	59.63	56.15	49.58	67.55	47.01	50.93	19.39
Population below federal poverty line							
White, Non-Hispanic	57.09	57.93	50.63	69.83	49.88	50.61	16.49
Black, Non-Hispanic	54.78	48.08	54.33	71.03	53.10	57.87	19.26
Hispanic	44.08	56.42	46.40	76.49	56.79	55.48	14.42
Asian or Pacific Islander, Non-Hispanic	63.98	65.66	60.89	74.16	54.28	54.09	11.16
Native American, Non-Hispanic	40.51	53.39	50.52	71.19	55.89	48.73	15.12
(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region	**Low Poverty Index**	**School Proficiency Index**	**Labor Market Index**	**Transit Index**	**Low Transportation Cost Index**	**Jobs Proximity Index**	**Environmental Health Index**
Total Population							
White, Non-Hispanic	56.42	51.77	57.05	74.73	53.63	47.93	15.25
Black, Non-Hispanic	41.25	36.91	54.12	83.02	64.05	51.50	4.53
Hispanic	43.14	40.13	47.74	79.51	58.43	51.38	10.20
Asian or Pacific Islander, Non-Hispanic	56.13	52.61	61.12	80.66	58.51	45.61	7.06
Native American, Non-Hispanic	47.91	44.43	48.94	74.39	54.56	50.21	17.87
Population below federal poverty line							
White, Non-Hispanic	45.52	46.99	50.65	78.41	59.18	52.10	12.64
Black, Non-Hispanic	33.43	32.04	51.55	85.01	67.10	52.17	2.27
Hispanic	33.76	36.30	41.76	81.92	61.67	52.89	8.76
Asian or Pacific Islander, Non-Hispanic	43.73	45.84	54.70	82.37	62.68	46.53	3.55
Native American, Non-Hispanic	32.63	33.79	43.02	83.22	64.12	52.10	7.78

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Low Poverty Index: The higher the score, the less exposure to poverty in a neighborhood.

School Proficiency Index: The higher the score, the higher the school system quality is in a neighborhood.

Labor Market Engagement Index: The higher the score, the higher the labor force participation and human capital in a neighborhood.

Low Transportation Cost Index: The higher the index, the lower the cost of transportation in that neighborhood.

Transit Trips Index: The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.

Environmental Health index: The higher the index value, the less exposure to (air pollution) toxins harmful to human health.

Protected Classes Index: values documenting the extent to which members of different racial or ethnic groups have access to particular opportunity indicators. The Tool provides a weighted average for a given characteristic.

Table 13 - Disability by Type

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction		(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing difficulty	14,405	4.00	77,629	3.69
Vision difficulty	5,906	1.64	41,906	1.99
Cognitive difficulty	16,721	4.64	110,762	5.27
Ambulatory difficulty	21,985	6.10	125,867	5.99
Self-care difficulty	9,217	2.56	51,875	2.47
Independent living difficulty	14,826	4.11	91,404	4.35

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 14 - Disability by Age Group

	(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction		(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region	
Age of People with Disabilities	**#**	**%**	**#**	**%**
age 5-17 with Disabilities	3,478	0.97	19,655	0.94
age 18-64 with Disabilities	21,334	5.92	143,543	6.83
age 65+ with Disabilities	18,738	5.20	96,754	4.61

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 15 - Disability by Publicly Supported Housing Program Category

(Clackamas County, OR CDBG, HOME, ESG) Jurisdiction	People with a Disability*	
	#	%
Public Housing	185	34.77
Project-Based Section 8	104	29.38
Other Multifamily	70	32.71
HCV Program	393	26.20
(Portland-Vancouver-Hillsboro, OR-WA CBSA) Region		
Public Housing	1,010	34.35
Project-Based Section 8	1,482	29.97
Other Multifamily	418	34.86
HCV Program	5,557	32.23

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.
Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

APPENDIX C

AFH LOCAL Data Sources

REPORT	LOCATION
Clackamas County 2012 Analysis of Impediments To Housing Choice	http://www.clackamas.us/communitydevelopment/documents/aifh_fullreport.pdf
Clackamas Opportunity Maps 2011	http://www.clackamas.us/housingauthority/opportunitymaps.html
2015 Poverty Report – Clackamas County Social Services Division	www.clackamasworkforce.org/media/uploads/2014PovertyReport.pdf
DHS County Quick facts 2015	https://www.oregon.gov/DHS/ABOUTDHS/.../County-QuickFacts-2015.pdf
State of Oregon 2016-2020 Analysis of Impediments to Fair Housing Choice	https://www.oregon.gov/.../2016-2020-Oregon-Analysis-of-Impediments- Fair-Housing-Choice-Report.pdf
City of Portland 2012 Fair Housing Plan	http://www.portlandoregon.gov/phb/article/426567
Opportunities and Challenges for Equitable Housing 2016 Metro	http://www.oregonmetro.gov/tools-partners/guides-and-tools/guide-equitable-housing http://www.oregonmetro.gov/sites/default/files/EquitableHousingReport-20160122.pdf
Fair Housing Council of Oregon	www.fhco.org
Clackamas County Development Agency Annual Report 2014-2015	https://hrapp.clackamas.us/development/documents/annualreport.pdf

APPENDIX D

PUBLIC COMMENTS

Legal Aid Services of Oregon

Portland Regional Office • Serving Clackamas, Hood River, Multnomah, Sherman, and Wasco Counties
520 SW Sixth Avenue, Suite 700 • Portland, Oregon 97204 • **(503) 224-4086; (800) 228-6958** • Fax: (503) 295-9496

September 15, 2016

Chuck Robbins, Director
Housing and Community Development Division
2051 Kaen Road #245
Oregon City, OR 97045

Re: Assessment of Fair Housing 2017 - 2021

Dear Chuck:

Thank you for inviting Legal Aid to participate in the current Assessment of Fair Housing. It has been a privilege to work with you and your staff in this important work. I am impressed by the work you have done in investigation, research and review of relevant data and in gaining the input of community members, the Fair Housing Council, Oregon Law Center and Legal Aid and I write on behalf of Legal Aid's clients to support the Assessment of Fair Housing.

Since 2006 when the County established the Housing Rights and Resources partnership between Community Development, Social Services, the Fair Housing Council of Oregon and Legal Aid, I have been the primary attorney providing services under the contract.

The Housing Rights and Resources program has been uniquely successful in partnering the County's resources, including information and referral, with the fair housing expertise of the Fair Housing Council and the legal expertise of Legal Aid. And many low-income residents have been helped indirectly by education and outreach and directly through information, referral, assistance, advice and representation. Some of these Clackamas residents have been in dire circumstances.

Unfortunately, discrimination in housing is common in Clackamas and other areas of Oregon. In my own practice here in Clackamas I have successfully represented clients in state and federal court in a variety of discrimination cases including a young single mother and disabled child denied housing due to the child's disability; a disabled teenage child denied use of a ramp to get his wheelchair into and out of the family's apartment and unable to attend school as a result; an elder polio survivor denied a wheelchair access ramp to his apartment who had to crawl through the mud when his wheelchair got stuck in the lawn; a single mother of two young children who were refused repairs to prevent rats from gnawing into their apartment and cabinets; a young African-American couple of school employees denied housing due to their race; an elder African-American woman denied mold remediation in her apartment that forced her to move out because she couldn't breathe while in the apartment.

The need for further work arises daily, particularly in regard to substandard housing that many fair housing-protected class members must endure for reasons that you have identified in the Assessment as contributing factors.

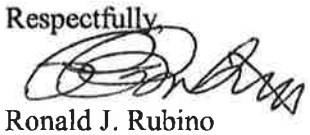
The importance of improved availability, access and quality of housing is obvious: the quality of housing equates to the quality of human life and also predicts children's well-being. A 2014 study in the *Journal of Developmental Psychology* confirmed that the relationship between housing characteristics and the well-being of low income children shows housing quality was the most consistent and strongest predictor of a child's well-being.

Specifically, children living in poorer quality homes exhibited greater emotional and behavioral problems than those who lived in higher quality housing, and their problems increased as housing problems worsened over time. *Brief on Relations between Housing Characteristics and the Well-Being of Low-Income Children and Adolescents;* MacArthur Foundation's webpage at: http://bit.ly/1auSd4x

Fair housing and race equity are furthered by enforcing housing laws because vulnerable populations suffer more. Correspondingly, morbidity and mortality rates from housing-related injuries and illnesses are disproportionately higher among these groups (National Center Healthy Housing, 2009). For example, African American children are twice as likely to die from residential injuries as white children. (Nagaraja et al., 2005). www.nchh.org/Policy/National-Safe-and-Healthy-Housing-Coalition.aspx

On behalf of Legal Aid's clients I support your work and the adoption of the Assessment of Fair Housing and implementation of the Goals with the support of as many resources as the County can muster.

Respectfully,



Ronald J. Rubino
Attorney at Law

Housing Land Advocates

September 20, 2016

Via First Class Mail and E-Mail:
Mark Sirious at marksir@clackamas.us

Mark Sirious
2051 Kaen Road
Oregon City, Oregon 97045

Re: Housing Land Advocates Comments on Clackamas County's AFH: Segregated housing and lack of affordable housing in local jurisdictions and throughout Clackamas County.

Dear Mr. Sirious:

This letter is submitted by Housing Land Advocates (HLA), a non-profit organization that advocates for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians. Please include these comments in the record for the above-referenced AFH.

Of great concern to HLA is the failure of the AFH to acknowledge the extent by which local land use policies contribute to the disparity of housing opportunities for Hispanic households compared to the majority white population. See Tables 1-4 attached to this letter. There is a direct correlation between the presence within the Metro area of affordable housing and the presence of protected class households. Historically and at present, Clackamas County and the local jurisdictions within it have had very limited availability of affordable housing and as a result, have relatively low percentages of residents of color.[1] For instance, research recently conducted by the County and compiled in the draft 2017-2021 Assessment of Fair Housing Report found that the County is 8% more white than the Portland Metropolitan region as a whole.[2] Also, of the recipients of subsidized housing in the County more are likely to be white than recipients in Multnomah and Washington counties.[3] Further, one of Oregon's five

[1] *See, e.g.*, Brad Schmidt, *Failure to Support Fair Housing Act Leads to Subsidized Segregation: Locked Out, Part 1*, Oregonian, June 2, 2012, available at: http://www.oregonlive.com/portland/index.ssf/2012/06/subsidizing_segregation_locked.html ("Lake Oswego and West Linn have so few affordable options, just 0.1 percent of the three-county total by one tally, that they have nearly five times more million-dollar homes as affordable rentals").

[2] HOUSING AUTHORITY OF CLACKAMAS COUNTY, 2017 – 2021 ASSESSMENT OF FAIR HOUSING REPORT – DRAFT, 14 (2016) *available at*: http://www.clackamas.us/housingauthority/plansandreports.html.

[3] *See* OREGON HOUSING AND COMMUNITY SERVICES, 2016-2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE, Figure I-22, Sec. I, p. 32 (2016) *available at*: https://www.oregon.gov/ohcs/DO/docs/2016-2020-Oregon-Analysis-of-Impediments-Fair-Housing-Choice-Report.pdf (13% of 2,793 subsidized housing beneficiaries in Clackamas County are minorities compared with 43% of 14,473 in Multnomah County and 33% of 3,816 in Washington County).

racially/ethnically concentrated areas of poverty is located in the County.[4] Local jurisdictions within the County contribute to the above problems. For example, Lake Oswego enacted policies to limit residential development and discourage population growth, which causes a lack of diversity and affordable housing options in Lake Oswego.[5]

Oregon Department of Human Services defines a Poverty Hotspot as a census tract with 20% or more of its population at or below poverty measured in at least two consecutive measurements.[6] Two of the poverty hotspots are notable in that the population is significantly Hispanic and very low income compared to Clackamas County and the metropolitan area as a whole. See Table 1-4 in Appendix 1 attached hereto. Overall, Clackamas County is underperforming when compared to its neighbors at providing affordable housing and, as a result, failing to address existing and growing segregation in housing.

Land use policies and ordinances are responsible for much of the disparities between housing opportunities for white households and Hispanic households in the County. For example, recently a local land use planner evaluated the land use policies and growth and residential housing patterns of two cities, Tigard and Lake Oswego. See G. Winterowd's presentations attached hereto as Attachments 1 and 2. It is clear that over the past twenty years Lake Oswego has chosen land use policies that restrict growth and therefore housing opportunities, especially multifamily housing, for protected class households. Similar patterns of residential development can be seen in other wealthy, white majority cities within the County.

The problems of too little affordable housing and segregation in the housing market in the County are only being worsened by recent decisions of local jurisdictions. In 2016 alone, HLA has commented on multiple proposed post-acknowledgment plan amendments from local jurisdictions in the County that lacked proper Statewide Planning Goal 10 findings. Goal 10 requires municipalities to demonstrate that their actions do not leave them with less than adequate residential land supplies in the types, locations, and affordability ranges for their populations.[7] The lack of consideration of Goal 10 shows that the issues of affordable housing and segregation in housing are not on the minds of local decision-makers when planning the futures of their communities. Given the present situation in the County, detailed above, County and local leaders must begin to consider the implications of their actions on segregation in housing and affordable housing.

---

[4] *Id.* at Sec. I, p. 25.

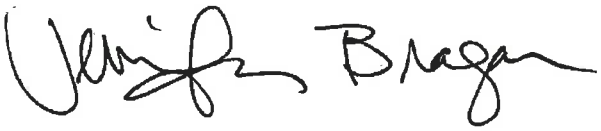
[5] *See* G. Winterowd , THE THIRD PILLAR OF SUSTAINABILITY, 22-25, presented at 2010 Housing Land Advocates Conference (2010) (From 2000 to 2007 the population of Lake Oswego increased at half the rate of the Portland MSA and the average home value increased by about $200,000; Latino population growth in 2007 was more than five times less than the Portland MSA). *See* Attachment 1.

[6] Available at: http://www.oregon.gov/dhs/business-services/ofra/Documents/High%20Poverty %20Hotspots %20Clackamas.pdf

[7] *Mulford v. Town of Lakeview*, 36 Or LUBA 715, 731 (1999) (rezoning residential land for industrial uses); *Gresham v. Fairview*, 3 Or LUBA 219 (same); see also, *Home Builders Assn. of Lane County v. City of Eugene*, 41 Or LUBA 370, 422 (2002) (subjecting Goal 10 inventories to tree and waterway protection zones of indefinite quantities and locations).

HLA urges the Commission to take affirmative action to correct the problems of segregation in residential housing patterns and a lack of affordable housing in the County. HLA is interested in working in a collaborative manner with Clackamas County and in offering technical assistance. Thank you for your consideration. Please provide written notice of your decision to HLA, c/o Jennifer Bragar at 121 SW Morrison Street, 11th Floor, Portland, OR 97204.

Sincerely,



Jennifer Bragar
President
Housing Land Advocates

cc: Gordon Howard, DLCD - gordon.howard@state.or.us
Louise Dix, FHCO - ldix@fhco.org
Tom Hughes, Metro - tom.hughes@oregonmetro.gov
Roger Alfred, Metro - roger.alfred@oregonmetro.gov
Elissa Gertler, Metro - elissa.gertler@oregonmetro.gov
Kevin Ko, Clackamas County - KKo@clackamas.us

Appendix I - Tables

Table 1

Canby Hotspot Neighborhood Characteristics v Clackamas County

- ACS Poverty Rate 27% v 10%
- % Renter Occupied ***1% v 29%***
- % SFHH 9% v 10%
- % Married w/Children 58% v 55%
- % White 52% v 84%
- % Latino ***47% v 8%***
- %with less than HS degree ***24% v 8%***
- Among all Oregon hotspots, Canby area clients had the fifth lowest percentage of English-language preference with 42 percent of clients preferring another language. Virtually all of those clients preferred Spanish.

Table 2

Clackamas Area Neighborhood Characteristics v Clackamas County

- Poverty Rate ***29% v 10%***
- % Renter Occupied ***52% v 29%***
- % SFHH 11% v 10%
- % Married w/Children 44% v 55%
- % White 69% v 84%
- % Latino 28% v 8%
- % w/less than HS degree ***24% v 8%***

Table 3

Racial-Ethic Dissimilarity Trends from 1990 to 2010

Clackamas METRO Region

- NonWhite/White ***13.49 - 26.23 - 28.76-31.79***
- Black/White ***29.56-35.35 - 63.52-48.59***
- Hispanic/White 18.82-31.03 - 25.72-37.13
- API/White 25.16-39.65 - 31.31-38

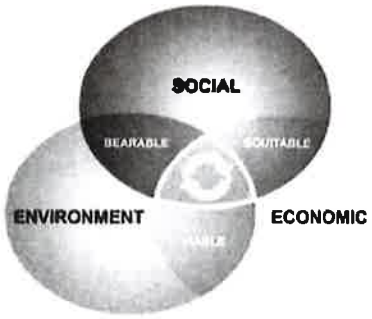
Both Clackamas and the Metro region are slowly increasing in white segregation—more so in Clackamas than the wider region. However, the METRO area is experiencing a decreasing trend in Black/White segregation but Clackamas is not. This argues for a greater diversity of housing

types with an emphasis on the housing type most affordable to the income level that represents the median income for one or more of the protected classes.

Table 4

	Clackamas	METRO
Disproportionate Housing Needs: % of HH with any of the 4 housing problems		
• White	***42.56***	***37.48***
• Black	0	55.34
• Hispanic	***76.92***	***58.75***
• API	38.10	43.36

The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room and cost burden greater than 30%. This Chart shows % as representing a share of the total population within the jurisdiction or region.



Greg Winterowd, Winterbrook Planning ... Setting the Framework for the Future (11AM-12:30PM)

THE THIRD PILLAR OF SUSTAINABILITY

The Road Home: The Intersection of Transportation and Affordable Housing
2010 Housing Land Advocates Conference
October 7, 2010

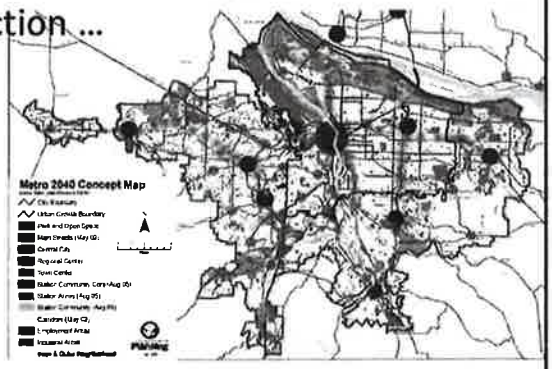
Federal Livability and Sustainable Communities Initiative – Welcome and Long Overdue

Livable communities have coordinated transportation, housing, and commercial development investments

- "increase choices for transportation users, provide affordable connections from residences to employment centers and other key amenities" and
- "enhance economic opportunities and environmental sustainability."

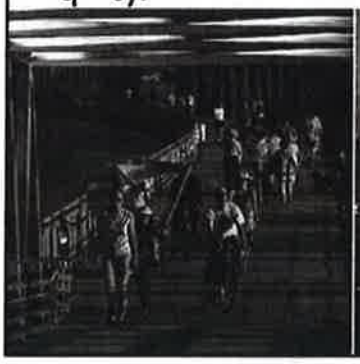
Provided by the Obama Administration

Oregon's 37 years of experience with effective state and regional growth management and recent "scenario planning" initiatives are clearly headed in the right direction …



Sustainability in Portland

In 2008, Portland was recognized as the nation's most sustainable city … yet it ranked low (31of 50) in housing costs – the primary measure of social equity.



The Third Pillar of Sustainability Social Equity

Sustainable communities must also: Promote equitable, affordable housing. Expand location- and energy-efficient housing choices for people of all ages, incomes, races and ethnicities to increase mobility and lower the combined cost of housing and transportation.

Affordable Housing Project in Downtown Portland

Housing & Transportation Study

To help moderate-income working families reduce their overall housing-transportation burden:

- Build affordable housing near existing and planned transit hubs
- Target public transportation improvements on areas with large numbers of moderate-income working families
- Redevelop older suburban neighborhoods with good transportation access to job centers

CENTER FOR HOUSING POLICY
October 2006

State and Federal Housing Law

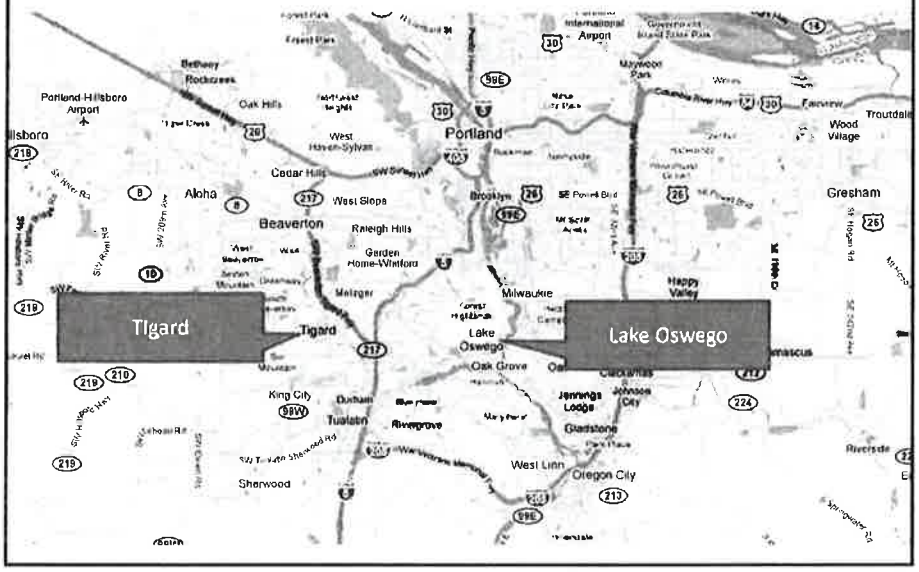
- Federal housing law works with Statewide Planning Goal 10 to require cities and counties in Oregon to provide for their regional fair share of housing opportunities.

Statewide Planning Goal 10 - Housing

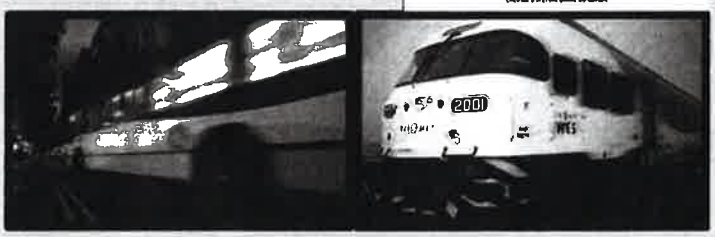
Sets minimum housing mix and density standards for the Portland region, and requires that approval standards for needed housing be clear and objective.

Michael Allen will address the Civil Rights Act, the Fair Housing Act, Executive Order 12898, and DOT orders in the afternoon session ...

A Tale of Two (Inner Suburban) Cities



Both cities have transit access to major employment centers – Goal 10 requires that both cities plan for 10 dwelling units per acre



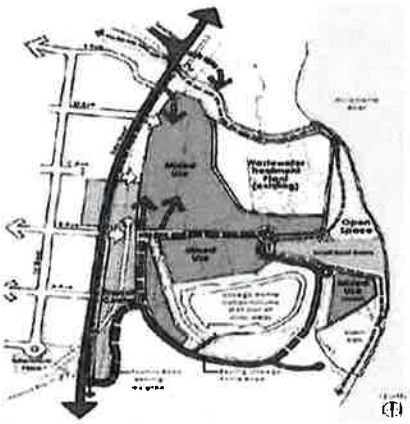
At first glance, Tigard is appears to lag behind Lake Oswego on the sustainability scale.

Lake Oswego is Justifiably Proud of Its Sustainability Plan

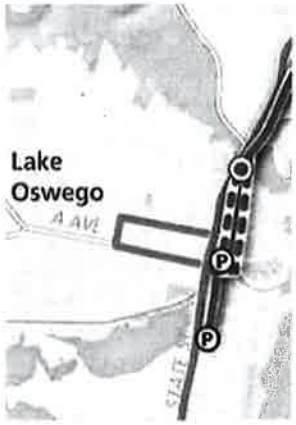
- "A sustainable Lake Oswego is a community that meets the vital human needs of the present without compromising our ability to meet future needs. This requires consideration of both long-term and short-term effects on ecological, economic, and community systems. Operating sustainably means that we are leaving a legacy for the community of Lake Oswego and the planet."
(City of Lake Oswego Sustainable City Vision and Guiding Principles)

Lake Oswego's Downtown Attractive and Walkable

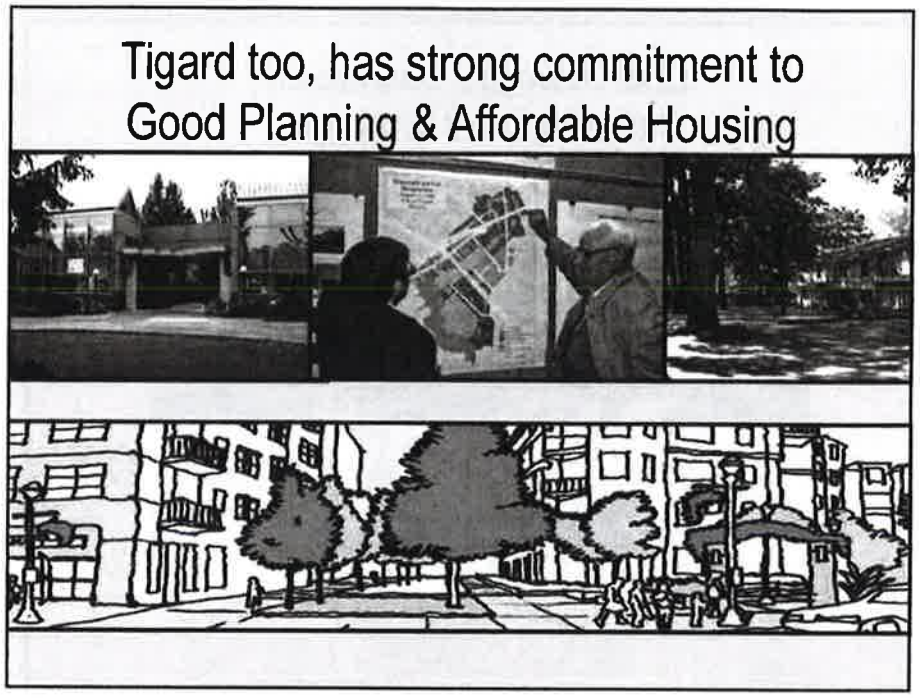
Lake Oswego is Planning for Intensive Redevelopment in the Foothills Area



Foothills Redevelopment Plan



Proposed Street Car Line


Tigard too, has strong commitment to
Good Planning & Affordable Housing

Don

1978 Letter from Tigard to Lake Oswego

Responding to Lake Oswego's policy to limit population growth within its urban service boundary to 49,000 through the Year 2000:

"a successful growth suppression policy in Lake Oswego is almost certain to cause a corresponding increasing in the growth rate of close 'substitute' communities ... including Tigard."

1000 Friends v. Lake Oswego (1981)

Confirmed the Goal 10 principle that each metropolitan city must accept its regional fair share of housing and population growth ... and zone enough land for needed housing under clear and objective approval standards

Before the Land Conservation and Development Commission
of the State of Oregon

1000 FRIENDS OF OREGON, an Oregon nonprofit corporation, et al, *Petitioner,*

vs.

CITY OF LAKE OSWEGO, *Respondent*

[LCDC No. 78-024]

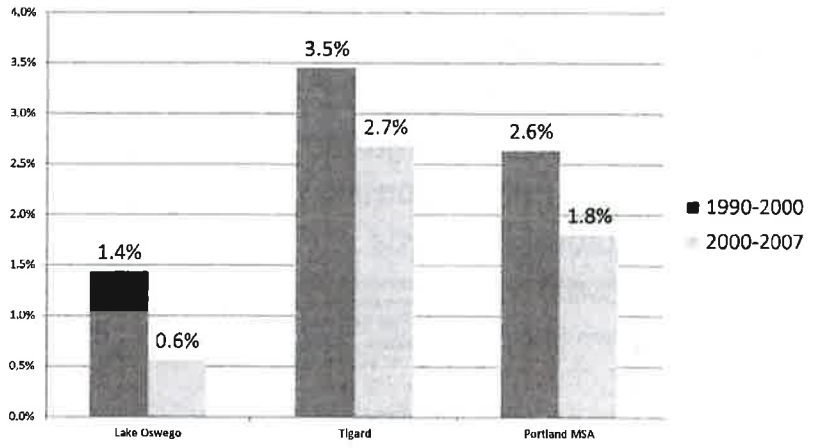
Revised January 8, 1981

1979 and 1984 LO Comp Plan

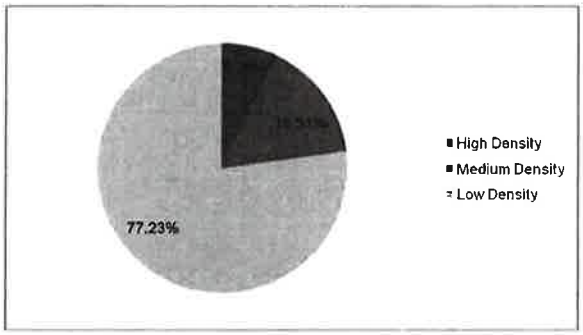
- In 1979, the plan projected that there would be 54,000 people living in the USB by the Year 2000
- In 1984, the plan estimated that the USB would accommodate about 50,000 by the Year 2000

In 2008, there were an estimated 43,412 people within the Lake Oswego USB.

Comparative Population Growth Rates

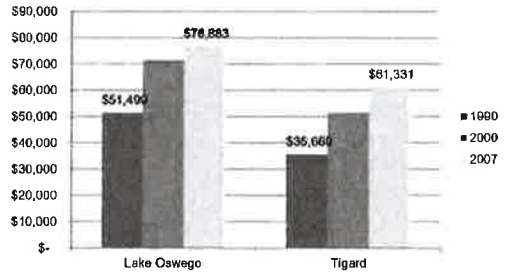


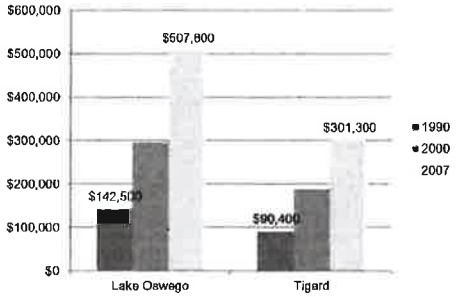
Housing Capacity In Lake Oswego USB Depends Primarily On Low-Density Infill



Lake Oswego has 3.1 vacant buildable acres remaining in its R-0, R-3, R-2 and R-2.5 zones

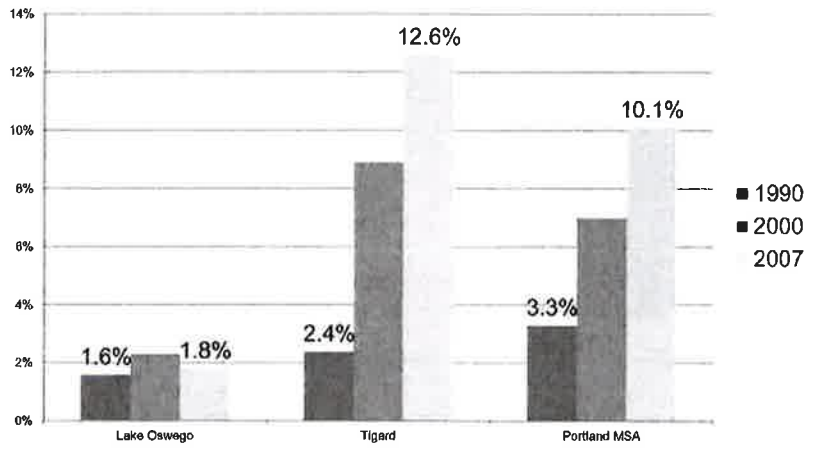
Over 75% of Lake Oswego's dwelling unit capacity is on lands zoned R-7.5, R-10, or R-15. The capacity is primarily based on infill: **nearly 80% of identified dwelling unit capacity (and 93% of the identified "buildable" land supply) in Lake Oswego is located on land with existing residential development. Mixed use areas lack clear and objective standards.**



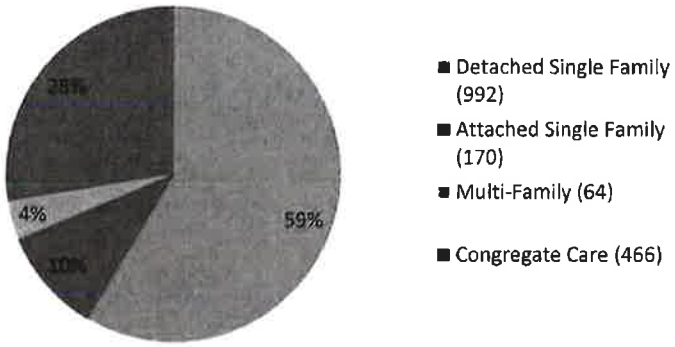


Income Growth v. Housing Value

Latino Population Growth



Recent Building Permits, Lake Oswego 1998-2008



Multi-family includes 6 accessory dwellings (SDUs) and 4 duplex units.

Metro's Role (OAR 660-007-0050)

(1) At each periodic review of the Metro UGB, Metro shall ... determine whether the buildable land within the UGB satisfies housing needs by type and density for the region's long-range population and housing projections.
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Infill is an Uncertain Process in Lake Oswego

On buildable residential land where housing is permitted under clear and objective standards, the maximum permitted density within the Lake Oswego USB is 5.5 dwelling units per net buildable acre – well below the Goal 10 standard or 10 du / nba.

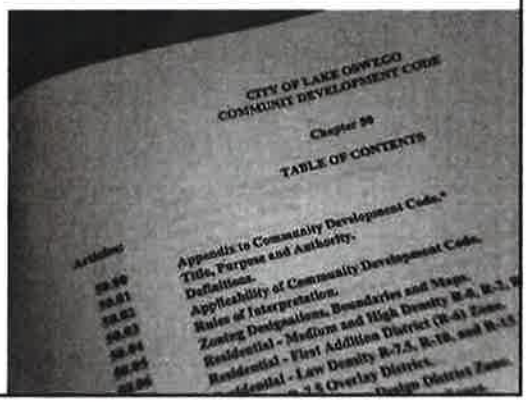
Metro does not review for clear and objective standards in local zoning ... which makes a difference when it comes to providing certainty for affordable housing.

Lake Forest R-7.5 Infill Opportunities
Vacant Land
Re-developable Land

BirdsHill R-10 Infill Opportunities
Vacant Land
Re-developable Land

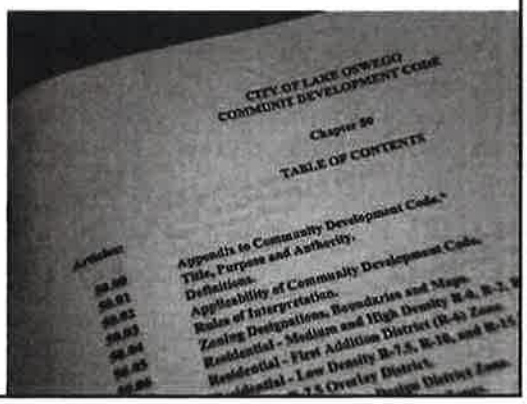
DLCD: No Comprehensive Review Since Acknowledgment 1994

Lake Oswego has made substantial amendments to the Community Development Code, neighborhood plans, and Sensitive Lands regulations ... many of which are not clear and objective.



2009 Lake Oswego Review

"Ideally, Lake Oswego would have a full range of owner-occupied and rental housing units ... subject to a clear, predictable review processes ... Lake Oswego prides itself on being a sustainable community. Clearly, **removing regulatory barriers to housing choices is an important part of being a sustainable community**." Scott Siegel, *Lake Oswego Review,* 10/29/09



Downtown Case Study:
555 2nd Street Site

Original affordable apartment building (33 units)

Proposed ALF project delayed in 2002 (City purchased site) (71units)

High-End Condos built in 2008 (30 units)

Lake Oswego Needs to Add a Third Leg – Affordable Housing – to Its Sustainability

To meet its regional housing obligations under Goal 10, Lake Oswego should:

- Adopt clear and objective standards for higher density redevelopment in Downtown, Town Centers and
- Ensure that affordable housing is built inFoothills
- Upzone Lower Density infill areas to encourage more affordable attached and small lot detached single family housing along transit corridors and near town centers for moderate-income workers

Guatemalan farmworkers just out side the LO UGB

Thank You

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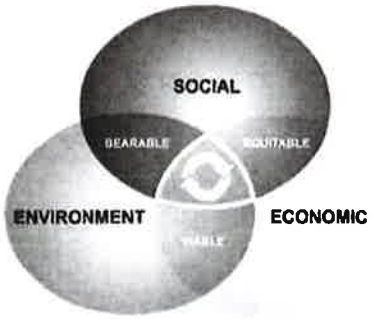


Greg Winterowd, Winterbrook Planning

The Other Side of the River: Using Land Use Planning to Create a Regional Fair Share of Housing

THE THIRD PILLAR OF SUSTAINABILITY

Cascadia Collaborative: Bridging to the Future
Joint Conference of the Oregon & Washington Chapters of the American Planning Association
Portland, Oregon / October 20, 2011

The Third Pillar of Sustainability
Social Equity

Sustainable communities must also: Promote equitable, affordable housing. Expand location- and energy-efficient housing choices for people of all ages, incomes, races and ethnicities to increase mobility and lower the combined cost of housing and transportation.

Affordable Housing Project in Downtown Portland

Statewide Planning Goal 10 - Housing

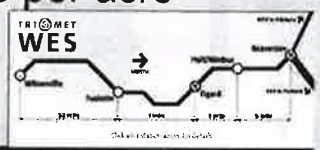
Sets minimum housing mix and density standards for the Portland region, and requires that approval standards for needed housing be clear and objective.

State and Federal Housing Law

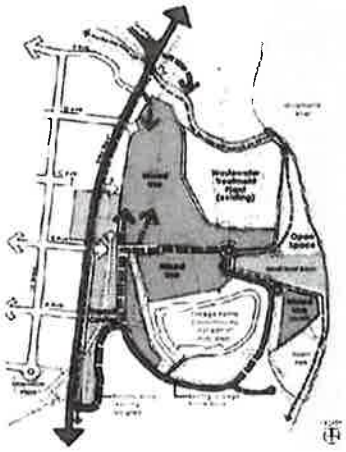
Federal housing law works with Statewide Planning Goal 10 to require cities and counties in Oregon to provide for their regional fair share of housing opportunities.

A Tale of Two (Inner Suburban) Cities

Both cities have transit access to major employment centers –
Both cities required by Goal 10 Housing to plan for 10 units per acre



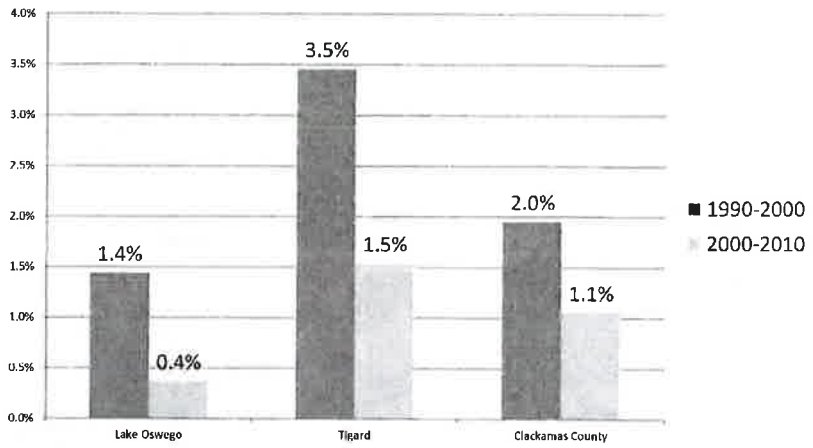
Both cities are planning for transit-oriented mixed use development

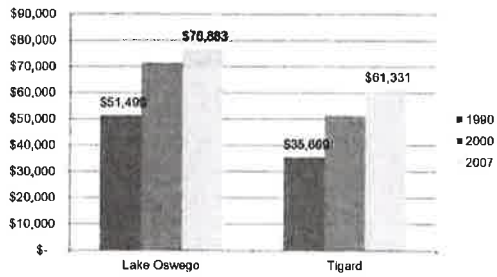


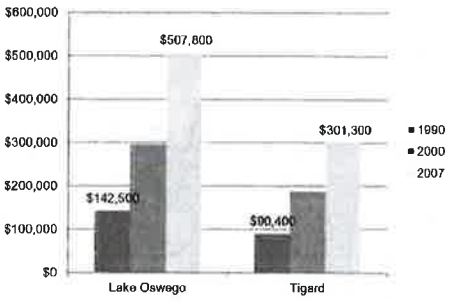
Some important differences

- Population growth
- Housing cost vs. income
- Latino population

Comparative Population Growth Rates







Household income

Tigard 72%

Lake Oswego 49%

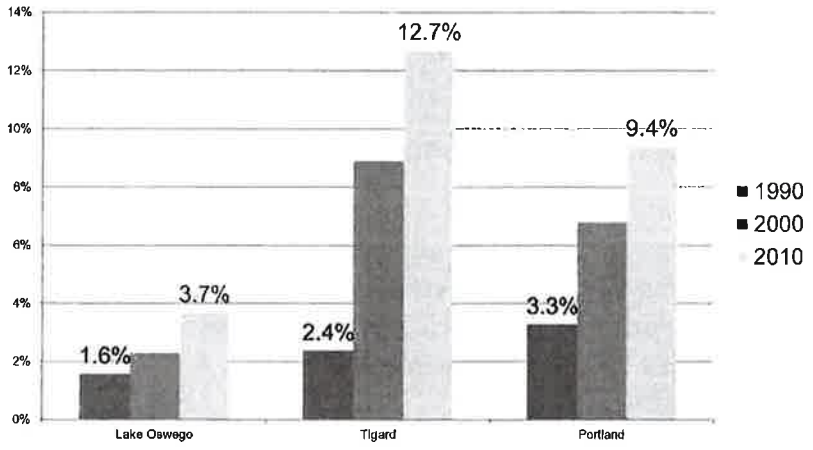
vs.

Home Value

Tigard 233%

Lake Oswego 256%

Latino Population Growth



To understand these demographic differences, we need to take

A Step Back in Time …

1978 Letter from Tigard to Lake Oswego

Responding to Lake Oswego's policy to limit population growth within its urban service boundary to 49,000 through the Year 2000:

"a successful growth suppression policy in Lake Oswego is almost certain to cause a corresponding increasing in the growth rate of close 'substitute' communities ... including Tigard."

1000 Friends v. Lake Oswego (1981)

Confirmed the Goal 10 principle that each metropolitan city must accept its regional fair share of housing and population growth ... and zone enough land for needed housing under clear and objective approval standards

Before the Land Conservation and Development Commission
of the State of Oregon

1000 FRIENDS OF OREGON, an Oregon nonprofit corporation,
et al, *Petitioner,*

vs.

CITY OF LAKE OSWEGO, *Respondent*

[LCDC No. 78-024]

Revised January 8, 1981

1979 and 1984 LO Comp Plan

- In 1979, the plan projected that there would be 54,000 people living in the USB by the Year 2000
- In 1984, the plan estimated that the USB would accommodate about 50,000 by the Year 2000

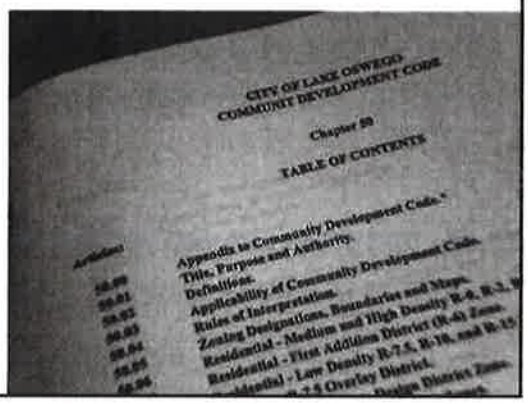
In 2008, there were an estimated 43,412 people within the Lake Oswego USB.

So What Happened?

Could the Oregon Department of Land Conservation and Development and Metro have done more?

No State Review Since 1994 – DLCD no longer reviews for clear and objective standards

Lake Oswego - substantial amendments to the Development Code, neighborhood plans, and Sensitive Lands regulations … *not* clear and objective.



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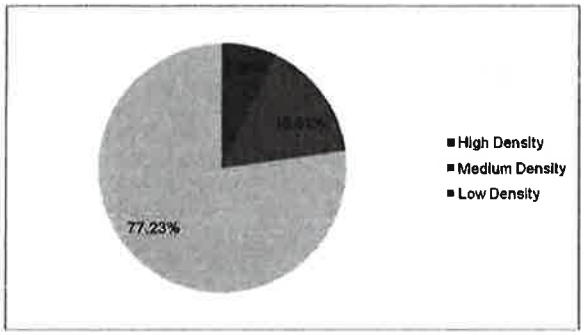
Metro's Housing Capacity Assumptions in Lake Oswego USB Optimistic



Buildable Land Supply: Lake Oswego has 3.1 vacant buildable acres remaining in its High and Medium Density Residential Zones

Mixed use areas lack clear and objective standards.

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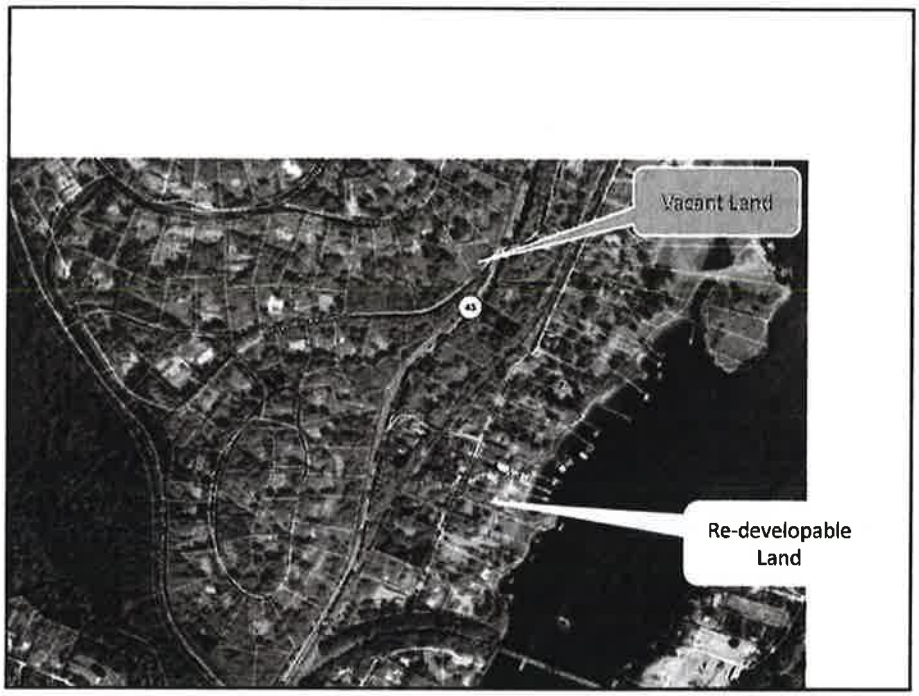

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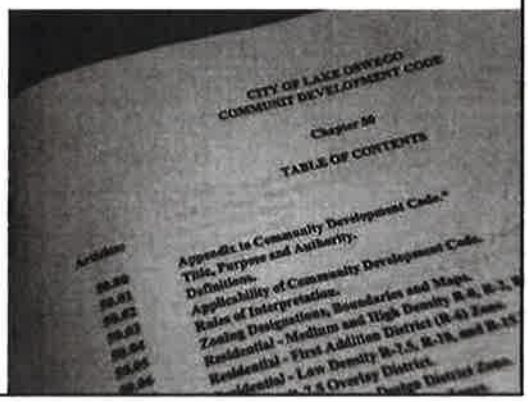

Metro should

- **Avoid overly optimistic assumptions regarding refill (infill and redevelopment)**
- **Ensure that federal funding of regional transportation projects is equitable**
- **Avoid reliance on abstract zoning categories to determine local Goal 10 compliance**
- **Avoid reliance on its transportation model for determining housing unit capacity**

DLCD should

Review all local land use regulations to ensure that:

- **Buildable land is planned and zoned to achieve at least 10 dwelling units per net buildable acre with a 50:50 mix of attached and detached housing**
- **Clear and objective review standards apply to buildable land for needed housing**

Lake Oswego should Add a Third Leg – Affordable Housing – to Its Sustainability Program

To meet its regional housing obligations under Goal 10, Lake Oswego should:

- **Adopt clear and objective standards for higher density redevelopment in Downtown, Town Centers**
- **Ensure that affordable measurable affordable housing objectives are built in Foothills redevelopment plans**
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Guatemalan farmworkers just out side the LO UGB

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Clackamas County
2017 – 2021 Assessment of Fair Housing Report
Executive Summary
Housing Authority of Clackamas County and
Housing and Community Development Division

I. Executive Summary

The Fair Housing Act was enacted in 1968. Recent changes to the Affirmatively Furthering Fair Housing Rule 24 CFR 5.150-5.180 were finalized by HUD on July 8, 2015. The 2016 Assessment of Fair Housing (AFH) in Clackamas County relied on census data provided by the U.S. Department of Housing and Urban Development (HUD), local information and community feedback through surveys and public meetings. The AFH was conducted jointly by the Housing Authority of Clackamas County and the Housing and Community Development Division.

HUD's newly developed AFH process has four nation-wide fair housing goals:

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

The community participation process for selecting Clackamas County's fair housing goals included 10 public meetings, three separate surveys during April, May and June and consultations with 23 community agencies. A total of 310 people responded to a community survey, a public housing resident survey and a Spanish language survey. Some surveys were mailed to groups and all surveys were available on paper and online. A public notice was published in community newspapers notifying interested persons that a draft of the AFH document, AFH Goals and an executive summary was posted for a 30-day comment period that was extended to 45 days. The public notice also included an invitation to attend a public hearing on September 15th to provide testimony on the proposed AFH goals.

Community meeting discussions in April and May included a review of past fair housing goals, a review of some of the 2010 census data demographics provided by HUD, a comparison of county data to regional housing data and, a review of maps of the county areas that have high concentrations of minorities and concentrations low income households.

Contributing factors to the fair housing conditions were identified after a review of HUD data, comments during public meetings, community survey data and local housing data.

Representatives of the Legal Aid Services of Oregon, the Fair Housing Council of Oregon, the Housing Authority of Clackamas County, the Social Services Division and the Housing and Community Development Division formed a work group to results of surveys, community meetings and HUD provided data to select the contributing factors listed below:

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

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

The Contributing Factors listed above are similar to the fair housing choice impediments identified in 2012 which are listed here:

1. Violations of fair housing laws in renting and purchasing property
2. Lack of knowledge of fair housing laws, including confusion about ADA and fair housing laws
3. Patterns of disadvantage for minorities and other protected classes – location, income, education
4. Lack of suitable affordable (including subsidized) housing in general, and lack of choice by quality, accessibility, location, type of units and access to opportunities
5. Land use and other public policies may be barriers to developing affordable housing

The process of analysis to select the 2017-2021 AFH Goals for the jurisdiction was a series of meetings and discussions by the work group. Workgroup members reviewed past fair housing efforts, clarified the contributing factors in the jurisdiction and in the Portland metro region and discussed the HUD provided census maps and data. After review of the available data and discussion of what data was not available, work group members agreed to the following goals in priority order:

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

6. Ensure that all housing in Clackamas County is healthy and habitable.

These AFH goals will become part of planning and performance reporting documents for the Housing Authority and the Housing and Community Development Division for the 2017 through 2021 program years. These AFH goals are similar to fair housing goals selected in 2012 listed here:

Goal I: Fair housing laws are enforced
Goal II: People and agencies/institutions know about fair housing
Goal III: Integrative patterns are promoted
Goal IV: Fair housing is attained regionally
Goal V: All rental housing is habitable
Goal VI: Actions are guided by local and regional data

Since 2012 the significant changes that have impacted Clackamas County include a sharp increase in housing demand due to the number of new residents moving to the Portland metro area including Clackamas County. Another significant change has occurred in in fair housing enforcement at the Oregon State Bureau of Labor and Industry (BOLI). BOLI legislative changes to the state law made Oregon state fair housing laws no longer substantially equivalent to federal fair housing laws. As a result HUD terminated its contract/partnership with BOLI as of April 3, 2016. This means that now all federal claims of fair housing violations will have to be filed directly with HUD. HUD has limited capacity to handle the additional workload. Fair Housing advocates are anticipating a backlog of complaints to be filed and investigated.

The 45-day public comment period on the draft AFH and AFH goals ended on October 10, 2016. Only two comments were submitted and both were accepted. Legal Aid Services of Oregon provided public testimony at the September 15th public hearing in favor of the AFH process and the AFH Goals. Housing Land Advocates (www.housingLandAdvocates.org) provided written testimony expressing concern on the lack of housing opportunities for Hispanic households due to land use and zoning policies in some communities that have limited multifamily housing projects.

For more information about Clackamas County's Assessment of Fair Housing Report go to the Housing and Community Development webpage at http://www.clackamas.us/communitydevelopment/maps.html