

2019-20 CDBG Action Plan COVID Amendment

Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The City of Portland is the lead agent for the Consolidated Plan Consortium, which also includes the City of Gresham and Multnomah County. In accordance with HUD regulations, the Consolidated Plan Consortium is required to submit a Consolidated Plan every five years as a condition of receiving four Federal formula grants: Community Development Block Grant, HOME Investment Partnership Grant, Emergency Solution Grant and Housing Opportunities for Persons with AIDS. The Consolidated Plan contains a snapshot of the community's housing and community development needs, identifies local priorities, and establishes the strategies each jurisdiction will use to address those priority needs. The Consolidated Plan also includes five-year numeric goals; each jurisdiction will be expected to measure its progress against those goals in the Consolidated Annual Performance Report filed in the fall. The 2016-2020 Consolidated Plan will be the fifth, five-year plan. Consortium members also submit an annual Action Plan; Action Plan FY 2019-2020 will be submitted this year along with any updates to the Five-Year 2016-2020 Consolidated Plan.

HUD regulations also require each Consortium receiving federal housing and community development funds to certify that it is affirmatively furthering fair housing. Because of major changes in the housing market since 2011, the Portland Consortium will update the 2011 Analysis of Impediments to Fair Housing Choice (AI), in 2019. The current 2011 AI describes the barriers to fair housing choice, which remain today, and includes recommendations for actions to address and eliminate them. Most of these recommendations are funded in the FY 2019-2020 Action Plan.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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

Summary of the objectives and outcomes identified in the Consolidated Plan

Annual Action Plan
2019

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As determined in the Needs Assessment and Market Analysis included in the Consolidated Plan, the three broad needs and goals identified are described below:

Affordable housing choice (Need); Increase and preserve affordable housing choice (Goal)

Affordable housing choice, includes safe housing, in good condition for all residents. Projects accomplishing this goal include home repair, down payment assistance, new housing development support, affordable housing development, rental housing rehabilitation and permanent supportive housing.

2019-2020 Goals: Direct financial assistance to homebuyers – 16-17; Housing units rehabilitated - 40

Basic services & homeless prevention/intervention (Need); Reduce homelessness and increase stability (Goal)

This goal includes preventing and reducing homelessness and increasing stability for all residents. Projects accomplishing this goal include interventions across a broad spectrum, such as: supportive and emergency services, transitional housing, shelters, homelessness prevention through service interventions, Housing First models, Fair Housing enforcement and education, cultural and population appropriate program delivery and activities to increase self-sufficiency, e.g., job training, employment readiness and education.

2019-2020 Goals: Public Services other than low-mod housing- 5,233; Other homeless prevention - 77

Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)

This goal includes improving infrastructure, facilities, economic opportunities and economic development. Programs to improve employment outcomes and household economic stability include employment training. Projects accomplishing this goal include extensive work with infrastructure, which is seen in Portland, Gresham and Multnomah County as essential in encouraging stability in neighborhoods, increasing access to persons with disabilities and attracting and retaining businesses. Projects will also support micro-enterprises and business development, as well as, public facilities, parks and transportation improvements.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Gresham has been mostly successful in achieving, and for some projects, exceeding its goals set in the 2018-2019 Annual Action Plan.

In achieving its CDBG and HOME goals, the City of Gresham is making an impact on identified needs in the City. The programs and projects continue to be on-track and on-schedule, resulting in timely disbursements of CDBG and HOME funds.

Gresham also re-evaluates the needs of low-income households and the services provided to them through participation in activities with other jurisdictions and agencies to coordinate these efforts. Gresham, Multnomah County, and Portland continue to work closely in soliciting applications for CDBG and HOME funds and implementation of projects. Gresham participates with METRO to address the on-going need for affordable housing in the region.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Consortia follows the federally required Community Participation Plan. This robust public participation strategy included several public hearings in advance of formal consideration and adoption by the jurisdictions. A preliminary draft was made available April 2, 2019. Public hearings regarding goals, objectives and strategies were held March 3rd, 2019 for Multnomah County, May 2nd for the City of Gresham and May 7th for the City of Portland. The Portland City Council reviewed the Action Plan projects June 12th. Gresham City Council reviewed their fourth-year Action Plan June 4th and Multnomah County Commissioners reviewed their fourth-year Multnomah County Action Plan June 6th. The Action Plans are also informed by the initial Five-Year Consolidated Plan planning meetings that included three Fair Housing information meetings, and over ten focus groups with specific cultural, language and geographic communities. Approximately 150 people participated in the Consolidated Plan Need Hearings, 165 in the focus groups and 100 people in the spring Consolidated Plan Action Plan meetings. The hearings and meetings were designed to reach a diverse range of people in terms of race, ethnicity, language, geography, income and culture. We met with low-income renters at their buildings, six linguistically specific groups were organized and several culturally specific groups met. Citizen participation was also encouraged through door knocking, four public meetings about barriers to Fair Housing, and a regional survey to a panel of over twenty thousand people. The focus groups included African Americans, Asian/Pacific Islanders, Hispanics and recent immigrant and refugee groups from Russia, Nepal, Burma, and Somalia. For the Need Hearings special attention was given to making the hearing accessible and known by non-English speaking citizens.

The City provided meeting and hearing notices, notice of the draft plans as required by the adopted Community Participation Plan, through a broad range of channels including newspapers and emails to interested parties. Draft plans were made available online and paper version was available at City Hall. Notices were also posted on PHB's website, and with Pamplin Media Group, and the Gresham Outlook.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP is was adopted in the 2016-2020 Consolidated Plan. The public participation process for the Consolidated Plan follows the CPP guidelines. The current CPP is an exhibit of the current five-year Consolidated Plan and will guide the future public participation processes.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City of Gresham and Multnomah County conducted a joint Community Need Hearing November 14, 2018. The hearing was directed to all residents of Gresham and East County as a whole. The highest priority need identified is lack of affordable housing. The issues also included high move-in costs and the stigma around multi-family or low-income housing. Senior housing concerns were also raised. The next priority in terms of ranking by participants was the need for additional community services including activities for youth and affordable healthcare. The next priority for attendees was lack of economic opportunities and jobs, especially living wage jobs. Finally, concerns over necessary infrastructure improvements were ranked. These included better lighting, improved signage, pothole repair and increased parking. Participants also noted some low-income neighborhoods lack grocery stores, making it difficult for residents to buy affordable food for their families.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP was adopted in the 2016-2020 Consolidated Plan. The public participation process for the Annual Action Plan follows the CPP guidelines.

Staff also consulted local reports describing community and economic needs.

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

No comments were not accepted.

7. Summary

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

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

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

Laurie Wells

1333 NW Eastman Parkway

Gresham Oregon 97030

503-618-2404

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

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

Gresham's 30-day comment period for the 19-20 Annual Action plan was from April 2 - May 2. Notice was published in The Outlook on April 2, 2019 and the Portland Housing Bureau published with the Pamplin Media Group 4/2/19. The City also posted on the City's web-page 4/3/19.

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

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

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

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

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

All three of our Consolidated Plan jurisdictions (Portland, Multnomah County, and Gresham) are represented on the Continuum of Care (CoC) Board (meets monthly) and its Executive Committee (meets quarterly.) The CoC coordinates with Consolidated Plan jurisdictions through meetings, calls and emails, to organize needs and Action Plan hearings and subcommittee to work on strategic planning, outreach, evaluation and system coordination. All of the jurisdictions support the Continuum's priorities focusing on the needs of the most vulnerable populations including chronically homeless persons, unaccompanied youth, families with children, and veterans, among others. The CoC is part of a coordinated effort called "A Home for Everyone." The A Home for Everyone Plan calls for assessment and rapid placement in appropriate housing, reducing vulnerability and increasing stability.

CoC goals from Consortium local homelessness plan align with our Consolidated Plan. Under the 2016-2020 Consolidated Plan, this primarily comes through coordination between the CoC needs assessments and strategic plan and the Consolidated Plan priority need #2 (Need for basic services and homelessness prevention and intervention) and goal #2 (Reduce homelessness and increase stability), though each of the Consolidated Plan priority needs and goals also aligns with CoC effort (especially those related to affordable housing production and preservation and economic opportunity). The CoC works with all three jurisdictions to engage consumers, neighborhoods and public agencies providing housing, health and social services (including health care agencies and the public housing authority.) The CoC specifically looks at the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness. The

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

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

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

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

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

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MULTNOMAH COUNTY
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	2016 was the first year of the jointly funded Joint Office of Homeless Services.
2	Agency/Group/Organization	HUMAN SOLUTIONS, INC./WILLOW TREE
	Agency/Group/Organization Type	Housing Services-homeless Grantee Department
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Human Solutions - Willow Tree was consulted as a subrecipient through meetings and notices.
3	Agency/Group/Organization	Human Solutions, Inc.
	Agency/Group/Organization Type	Housing Grantee Department

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Human Solutions was consulted as a subrecipient through meetings and notices.
4	Agency/Group/Organization	East County Solutions
	Agency/Group/Organization Type	Services-Education Services-Employment Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	East County Solutions was consulted as a subrecipient through meetings and notices.
5	Agency/Group/Organization	Metropolitan Family Services
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	MFS was consulted as a subrecipient through meetings and notices.
6	Agency/Group/Organization	El Programa Hispano Catolico
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Education Services-Employment Services - Victims Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	El Programa Hispano was consulted as a subrecipient through meetings and notices.
7	Agency/Group/Organization	JOIN
	Agency/Group/Organization Type	Housing Grantee Department
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	JOIN was consulted as a subrecipient through meetings and notices.
8	Agency/Group/Organization	Community Energy Project, Inc
	Agency/Group/Organization Type	Services - Housing Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Energy Projects was consulted as a subrecipient through meetings and notices.
9	Agency/Group/Organization	PORTLAND HOUSING CENTER
	Agency/Group/Organization Type	Housing Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	PHC was consulted as a contractor for Gresham's down payment assistance program.

10	Agency/Group/Organization	Micro Enterprise Services of Oregon
	Agency/Group/Organization Type	Services-Education Services-Employment Grantee Department
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	MESO was consulted as a subrecipient through meetings and notices.
11	Agency/Group/Organization	Unlimited Choices
	Agency/Group/Organization Type	Housing Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Unlimited Choices was consulted as a subrecipient through meetings and notices.
12	Agency/Group/Organization	Family of Friends
	Agency/Group/Organization Type	Services-Children Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Family of Friends was consulted as a subrecipient through meetings and notices.
13	Agency/Group/Organization	City of Gresham
	Agency/Group/Organization Type	Other government - Local Business and Civic Leaders Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City staff holds briefings with City Council to review applications and initial recommendations from the Community Development and Housing Subcommittee (CDHS) for funding in the upcoming fiscal year. This ensures the civic leaders in our community have an opportunity to provide input and direction prior to being presented final recommendations at the Annual Action Plan City Council meeting. In addition, the CDHS Council Liaison attends all applicant presentations and CDHS discussions and offers input as is appropriate. Business leaders are members of City Council and the CDHS. Their input from a business perspective is offered in meetings and considered.

14	Agency/Group/Organization	MULTNOMAH COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Gresham has no Corrections Department or corrections facilities. All corrections activities and consultation occurs at the County level with input from participating jurisdictions. Multnomah County Department of Community Justice (DCJ) provides social and housing services to individuals who are on parole/probation and those who are leaving the justice system. DCJ staff offered input to the development of the 2016-20 Consolidated Plan. DCJ staff also are consulted on population's housing needs by the Joint Office on Homelessness Services (JOHS).
15	Agency/Group/Organization	IRCO
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	IRCO was consulted through the application process and as a subcontractor to Living Solutions.

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Multnomah County	This collaboration aligns with the Strategic Plan goal of aligning homeless services.

Table 3 - Other local / regional / federal planning efforts

Narrative

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AP-12 Participation - 91.401, 91.105, 91.200(c)

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

The Consortia follows the federally required Community Participation Plan. This robust public participation strategy included several public hearings in advance of formal consideration and adoption by the jurisdictions. A preliminary draft was made available April 2, 2019 and the public hearings regarding goals, objectives and strategies were held April 3, 2019 for Multnomah County, May 2nd for the City of Gresham and May 7th for the City of Portland. The Portland City Council reviewed the Action Plan projects June 12th. Gresham City Council reviewed their fourth-year Action Plan June 4th and Multnomah County Commissioners reviewed their fourth-year Multnomah County Action Plan June 6th. The Action Plans are also informed by the initial Five-Year Consolidated Plan planning meetings that included three Fair Housing information meetings, and over ten focus groups with specific cultural, language and geographic communities.

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The City of Gresham and Multnomah County conducted a joint Community Need Hearing November 14, 2018. The hearing was directed to all residents of Gresham and East County as a whole. The highest priority need identified is lack of affordable housing. The issues also included high move-in costs and the stigma around multi-family or low-income housing. Senior housing concerns were also raised. The next priority in terms of ranking by participants was the need for additional community services including activities for youth and affordable healthcare. The next priority for attendees was lack of economic opportunities and jobs, especially living wage jobs. Finally, concerns over necessary infrastructure improvements were ranked. These included better lighting, improved signage, pothole repair and increased parking. Participants also noted some low-income neighborhoods lack grocery stores, making it difficult for residents to buy affordable food for their families.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP was adopted in the 2016-2020 Consolidated Plan. The public participation process for the Annual Action Plan follows the CPP guidelines.

Staff also consulted local reports describing community and economic needs.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	There were approximately 24 attendees for the joint Gresham/Multnomah County needs assessment meeting.	Although comments were varied, most attendees cited the lack of affordable housing as the primary issue. Additionally, there was much discussion about the lack of services (mental health and youth), jobs and lighting and sidewalks.	No comments were not accepted	
2	Public Hearing	Non-targeted/broad community	The Gresham Action Plan hearing was held May 2 with the CDHS. One additional community member attended, but did not offer comment.	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public Hearing	Non-targeted/broad community	City of Gresham City Council Meeting to approve the 19-20 Annual Action Plan June 4th.	Comments received indicated support and appreciation for the City and HUD funding.	No comments were not accepted.	

Table 4 – Citizen Participation Outreach

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Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,012,678	9,199	15,439	1,037,316	1,000,000	
CDBG-CV	public - federal	Coronavirus preparation, prevention and response	\$641,125					

Table 5 - Expected Resources – Priority Table

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

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

because public funds are used as “last in” gap financing amounts, which requires that more substantial investments are in place. In the 2017-2018 fiscal year, Gresham leveraged almost four times the amount of CDBG-expended funding from other sources – other federal, state/local, private and in-kind. The Portland Housing Bureau as the Consortium lead makes required matches for use of HOME funds.

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

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

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

Discussion

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase & preserve affordable housing choice	2016	2020	Affordable Housing Public Housing Homeless		Affordable housing choice	CDBG: \$150,640	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted Rental units rehabilitated: 24 Household Housing Unit Homeowner Housing Rehabilitated: 16 Household Housing Unit
2	Reduce homelessness & increase stability	2016	2021	Homeless Non-Homeless Special Needs		Basic services & homeless prevention/intervention	CDBG: \$433,901	Public service activities other than Low/Moderate Income Housing Benefit: 5233 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 75 Households Assisted Homelessness Prevention: 77 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Infrastructure, facilities & economic opportunity	2016	2020	Non-Housing Community Development		Community & economic development	CDBG: \$248,400	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Increase & preserve affordable housing choice
	Goal Description	Funding allocated includes \$68,125 in Program Administration.
2	Goal Name	Reduce homelessness & increase stability
	Goal Description	Funding allocated includes \$68,125 in Program Administration.
3	Goal Name	Infrastructure, facilities & economic opportunity
	Goal Description	Funding allocated includes \$68,125 in Program Administration.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The 2019 Annual Action Plan outlines projects meeting needs identified in the 2016-2020 Consortium Consolidated Plan, opportunities in Gresham and City priorities. Initial project recommendations were made in consultation with the Community Development and Housing Subcommittee which reviewed and evaluated applications. Part of the review process was consideration of the ability of local and regional agencies and partners to successfully achieve objectives and administrative demands, including monitoring. The City Council made the final decisions on projects.

#	Project Name
1	Program Administration
2	Consolidated Plan/Action Plan Coordination
3	Children's Fountain Principal and Interest Payment
4	Children's Fountain Prepayment
5	Pacific Street/Nadaka park Principal and Interest Payment
6	Do It Yourself Weatherization Workshops
7	El Programa Hispano Catolico
8	Family of Friends Mentoring
9	AARP Experience Corp Mentoring
10	Human Solutions Rent Assistance Admin
11	Human Solutions Willow Tree Transitional Housing
12	Living Solutions
14	Adapt A Home
15	Mend A Home

Table 7 – Project Information

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

The City of Gresham allocates CDBG and HOME funds through a competitive process, with review and input provided by the Community Development and Housing Subcommittee, a 10-person citizen advisory group, along with scoring and review by a Technical Advisory Group. Distributions are made in the following prioritized categories: housing development/rehabilitation, economic development, public improvements, and public services. Further, the City gives priority to projects that promote investment in low-income neighborhoods; leverage additional revenue to stimulate private development; achieve multiple affordable housing or other CDBG priorities; work toward revitalization of the Rockwood Town Center; and, help promote redevelopment of Downtown.

Although there have been nominal increases in funding the past few years, with 2019-2020 a nominal decrease, the primary barrier remains increasing demands for projects and services. It is challenging, if

not impossible, to make significant changes in the face of changing economies and decreasing levels of public support (federal, state and local) for badly needed projects in all categories.

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AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	Program Administration
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice Reduce homelessness & increase stability Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Basic services & homeless prevention/intervention Community & economic development
	Funding	CDBG: \$194,375
	Description	General management, oversight and coordination, staffing of advisory committee (CDHS), contract preparation, environmental review, management of project selection process.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	Consolidated Plan/Action Plan Coordination
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice Reduce homelessness & increase stability Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Basic services & homeless prevention/intervention Community & economic development
	Funding	CDBG: \$10,000
	Description	Payment to City of Portland (PHB) for Consolidated Plan/Annual Action Plan coordination. Additionally, staffing of county-wide advisory committee.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
3	Project Name	Children's Fountain Principal and Interest Payment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$78,400
	Description	Children's Fountain Principal and Interest Section 108 Loan Payment.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
4	Project Name	Children's Fountain Prepayment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$150,000
	Description	Section 108 loan prepayment.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	
5	Project Name	Pacific Street/Nadaka park Principal and Interest Payment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$20,000
	Description	Section 108 loan principal and interest payment.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	Do It Yourself Weatherization Workshops
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$6,000
	Description	Workshops for 25 low-income Gresham residents to teach them how to weatherize their homes and provide them with weatherization kits.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
	Project Name	El Programa Hispano Catolico

7	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$53,591
	Description	Provide anti-poverty services to 5,100 low-income Latino Gresham residents.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	Family of Friends Mentoring
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$16,121
	Description	Funds will be used to recruit, train, screen, match, support and evaluate 8 Gresham children and families with 8 volunteer mentors.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
Planned Activities		
9	Project Name	AARP Experience Corp Mentoring
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention

	Funding	CDBG: \$18,371
	Description	5 seniors will provide mentoring support to 25 at risk kindergarten to 3rd grade students.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
10	Project Name	Human Solutions Rent Assistance Admin
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$47,173
	Description	Provides rent assistance admin funding to prevent homelessness by assisting 75 very low and low-income Gresham households.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
11	Project Name	Human Solutions Willow Tree Transitional Housing
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$48,562
	Description	Funds will be used to subsidize rent for transitional housing and additional supportive services for 77 extremely low-income people.

	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
12	Project Name	Living Solutions
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$250,083
	Description	Living Solutions provides employment services to 95 Gresham residents with incomes under 30% MFI. Services include: comprehensive assessments, job-readiness support & skill-building, job training, and job placements focused on career track employment. This includes serving 20 individuals within the Gresham's immigrant and refugee community.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
13	Project Name	Adapt A Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$83,000

	Description	Remove physical barriers and make the affordable built environment accessible for 24 low and moderate income seniors and people with physical disabilities.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
14	Project Name	Mend A Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$61,640
	Description	Provide critical home repairs to 16 low/moderate income homeowners so that they can continue to live in the Gresham community in a safe, secure and functional home.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

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

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

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

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

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AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

Barriers to affordable housing in Gresham, and throughout the Portland Metropolitan Area, center around the high costs of development and other market forces such as low vacancy rates and increasing land values. Due to a region-wide construction uptick, the costs for labor, materials, land and other development expenses have risen significantly enough to manifest as a clear barrier for the development of affordable housing. There is a particular challenge in providing housing affordable to very low-income populations of 0-30% of median family income. The rise in need and the costs of associated wraparound resident services for very low-income populations is a contributing factor, as is the limited availability of Section 8 Housing Choice Vouchers and Project-Based Vouchers. Limited access to public transit options is also a barrier to affordable housing development in Gresham.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

In 2019 the City of Gresham worked with the Task Force on Housing and a consultant team to develop a housing strategy implementation plan that provides a set of tools to increase housing affordability and availability.

The strategy identifies over fifteen actions to expand the affordability and availability of housing, including tools for site selection and control; improving project design and permitting; financing; and operations. For example, the City is currently working on code amendments for space efficient housing, which will allow a wider variety of housing types in more areas throughout the City.

The City is also working with Metro to finalize a local implementation strategy for the construction or renovation of affordable housing as part of the Regional Affordable Housing Bond that voters passed in November 2018.

Discussion

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

Introduction

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

The City of Gresham actively supports quality housing that is affordable to all residents. The Rental Inspection Program has been in place since 2007 and has been a model for other jurisdictions. A modest licensing fee has allowed the City to work with landlords to improve properties over the years. The program results in periodic inspections for compliance with a broad range of habitability standards including fire, life, and safety code violations. Common violations found and corrected are visible mold, inadequate ventilation, illegal heat sources, plumbing disrepair, inoperable smoke detectors, and exposed wiring. The inspection program is a practical approach to raised expectations for both landlords and tenants.

To further the objective of quality housing for all segments of the population, the City supports rehabilitation of units to provide permanent accessibility for persons with disabilities and home repair assistance for lower-income households. In addition, the City provides assistance for lower-income homebuyers in the form of down payment assistance through its own program and also funding for Proud Ground.

The City is also improving an array of housing choices for residents in the future. Gresham adopted amendments to the City's Housing Policy in 2013. The Housing Policy project provided housing data and information on housing trends used to develop housing goals, policies and action measures for Gresham as a whole, Downtown, the Civic Neighborhood and Rockwood. City Council initiated a Housing Task Force in 2018 comprised of a wide range of community stakeholders to recommend actions in support of housing needs in our community. Task Force recommendations are anticipated in summer 2019. The City continues to work with the Department of Land Conservation and Development and Oregon Housing and Community Services on policy resources to assist in housing development and services to

support residents. The City is working with partners (The Division Transit Project, Metro, TriMet, the City of Portland, the Oregon Department of Transportation and Multnomah County) to meet transportation needs of Gresham residents and bring key investments to Gresham. Along with transit elements, plans call for actions regarding safety, economic development, community enrichment (“placemaking” particularly around hubs), and housing.

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

Actions planned to reduce lead-based paint hazards

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

Multnomah County's Health Department conducts lead-based paint hazard reduction services in the community. The Health Department also conducts free lead blood tests for children and treats low income families who have lead-related medical issues.

The City of Portland has successfully administered three HUD Lead Hazard Reduction Grants, providing \$17 million dollars in lead hazard reductions assistant to over 1,800 low-income households (protecting over 3,000 children from lead poisoning) since 1998.

Actions planned to reduce the number of poverty-level families

The City of Gresham has supported a number of projects over the years, and in the current year, to reduce the level of poverty and increase the capacity of families to earn living wages. Workforce development and training efforts are supported through the Living Solutions program which assists low-income persons to gain job skills and then places those individuals in career-path jobs. Additionally, the City is providing funding for IRCO to partner with Living Solutions to address similar needs in Gresham's

immigrant and refugee community. The City is also working with regional partners to improve the transportation system, notably the bus-rapid-transit system (BRT) along Powell and Division and to the employment campuses in northeast Gresham, including Mt. Hood Community College.

The City sponsors a program to encourage small businesses by offering incentives for permits and licenses for remodeling and façade improvements for vacant and some occupied business spaces. The Small Business Center actively assists potential businesses in Central Rockwood, the Civic Neighborhood or Downtown. As of December 2018, 293 businesses have been helped to the benefit of both the business and the community.

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

Actions planned to develop institutional structure

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

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

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

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

service agencies

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

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

Discussion

Program Specific Requirements

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

Introduction

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

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

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

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

Other CDBG Requirements

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

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

1. Distribution of Funds

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

HTF was added to this Action Plan in error. Gresham doesn't receive HTF funds.

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

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

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

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

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

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

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

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

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

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

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

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

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for

the rehabilitation of housing, enter “N/A”.

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

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

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

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

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

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

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

Discussion

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