

2023-24 Annual Action Plan Draft

Executive Summary

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

1. Introduction

The Portland Consortium (“Consortium”) includes the City of Portland (Lead), the City of Gresham and Multnomah County. In accordance with HUD regulations, the 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, establishes the strategies each jurisdiction will use to address those priority needs and sets five-year goals to measure each jurisdiction’s achievements. The 2021-2025 Consolidated Plan was approved by HUD in August 2021.

Over the five-year period covered by the 2021-25 Consolidated Plan over \$75 million is expected to be available through these programs, including allocations and program income. While most of this funding will be administered by the City of Portland as the Consortium Lead, the City of Gresham and Multnomah County receive their own CDBG allocations and Gresham also selects projects for a portion of the Consortium’s HOME funds. The following are the relevant programs and the associated national objectives:

- **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.

The Consolidated Plan is carried out via the Annual Action Plans, which identify specific projects and annual goals for the Federal formula grant funds received by each member of the Consortium. This document is the City of Gresham’s 2023-24 Annual Action Plan under the 2021-2025 Consolidated Plan and it details the City’s plans for CDBG entitlement funding. HOME funds are detailed in the City of Portland’s plan, but we will reference HOME funded projects in the narrative pieces of the plan wherever applicable. The 2023-24 Annual Action Plan is the third Annual Action Plan under the current Consolidated plan.

Consortium members report on annual accomplishments and progress toward annual and five-year goals in the Consolidated Annual Performance and Evaluation Report (CAPER) filed each year in the

fall. The 2022-2023 CAPER will be the second CAPER under the 2021-2025 Consolidated Plan and will be completed in Fall 2023.

HUD regulations also require that each Consortium receiving federal housing and community development funding regularly complete an Analysis of Impediments to Fair Housing Choice (AI). This requirement was suspended when the 2021-2025 Consolidated Plan was developed and submitted, so the Consortium members followed the interim “Preserving Community and Neighborhood Choice” rule that was in place at the time. The requirement to create an AI was reinstated on July 31st, 2021, after the 2021-2025 Consolidated Plan had been submitted to HUD. The Consortium partners plan to create a new AI during the creation of the 2026-2030 Consolidated Plan and will use the 2011 AI to inform Action Plans under the 2021-2025 Consolidated 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.

As determined in the 2021-2025 Consolidated Plan, three broad needs and goals were identified described below:

Affordable housing choice (Need)

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

The community needs 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.

2023-24 Action Plan Goals: Rental units rehabilitated- 12 housing units; Homeowner Housing rehabilitation- 36 housing units; Financial Assistance to Homebuyers- 15-23 households*; Public Services activities other than low-mod housing- 85; HOME rental units developed: 3-4 units

*Homebuyer assistance and affordable housing development will be funded using HOME funds, which are included in Portland’s Con Plan as the Consortium Lead.

Basic services & homeless prevention/intervention (Need)

Reduce and prevent homelessness, including mitigating the overrepresentation of Black, Indigenous, and People of Color experiencing housing instability. (Goal)

There is a pressing need in the community to prevent and reduce homelessness and increase stability for all residents. Projects accomplishing this goal include culturally relevant services and interventions across a broad spectrum, such as supportive and emergency services, rent assistance, transitional housing, shelters, homelessness prevention through service interventions, Housing First models, and Fair Housing enforcement and education.

2023-24 Action Plan Goals: Rent Assistance/Rapid rehousing- 56 Households*; Supportive Services- Job Training- 74*

*Rent Assistance & Rapid Rehousing and Supportive Services will be funded using HOME-ARP funds, which are included in Portland's Con Plan as the Consortium Lead.

Community and economic development (Need)

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

The community needs improvements to area infrastructure, facilities, economic opportunities, and economic development. Programs to improve employment outcomes and household economic stability include employment training, referral and self-sufficiency and economic enhancement programs. Anti-poverty strategies include a variety of public services that provide support to residents across the lifespan. Projects will also support micro-enterprises and business development, as well as public facilities, parks, and transportation improvements.

2023-24 Action Plan Goals: Public Services activities other than low-mod housing- 450; Business assistance- 45, Public Improvements- 44,200;

	Projects	Rental Units Rehabbed	Homeowner Units Rehabbed	Public Services Other Than LM Housing	Homeownership Assistance	Affordable Units Constructed
Goal 1: Increase & Preserve Affordable Housing Choice	Adapt-A-Home	12	12			
	Mend-A-Home		24			
	DIY Weatherization			52		
	Proud Ground*				3	
	WELCOME HOME*				20	
	Development Project*					3-4
	TOTAL	12	36	52	Up to 23	3-4

	Projects	HOME-ARP Supportive Services: Job Training	HOME-ARP Supportive Services: Rent Assistance
Goal 2: Reduce Homelessness & Increase Stability	Living Solutions**	50	
	Willow Tree**		56
	My Fathers House**	24	
	TOTAL	74	56

	Projects	Businesses Assisted	Infrastructure Improvements	Public Services Other Than LM Housing
Goal 3: Infrastructure, Facilities & Economic Opportunity	AARP Experience Corps			100
	Eastside Timbers			300
	Living Solutions			50
	MESO	45		
	Streetlight Improvements		9200	
	Parks Improvements		35000	
	TOTAL	45	44200	450

*HOME funded activity that is mentioned in the AP-05, but is not included in the AP-20 or AP-35 because they are included in Portland's plan.

**HOME-ARP funded activity that is mentioned in the AP-05, but is not included in the AP-20 or AP-35 because they are included in Portland's plan. HOME-ARP projects were allocated in 2022-23 and will continue into 2023-24.

Goal Summary Table

3. Evaluation of past performance

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

The Consortium Partners have made progress in meeting community needs over the years. The organizational structure includes coordination between departments within the Consortium jurisdictions as well as coordination with agencies outside the Consortium, including Metro and Home Forward. The Consortium planning efforts create efficiencies in performance and delivery in spite of dwindling resources. Collaborative county-wide planning efforts include targeting the need for housing, building a suitable living environment through services and infrastructure, and fostering a system and improvements to spur economic development. In addition to a regional approach to projects and programs, area residents have supported increasing local resources to address the affordable housing crisis in the form of housing bond measures, general funds, and fees. Additionally, Portland, Gresham and Multnomah County have strong regional planning efforts, including the Continuum of Care Board that focuses on alleviating the sufferings faced by populations experiencing homelessness. This

combination of collaboration and local resources have helped the Consortium to actively address the affordable housing and economic prosperity needs of the community.

Gresham has been mostly successful in making progress towards Gresham-specific Consolidated Plan goals. In the 2022-2023 program year, many of the City's activities are on track to meet or exceed annual goals, while others have fallen short. Rising costs due to inflation, higher rents, and an increased need for services have resulted in a higher dollar amount per client needed to stabilize households served by CDBG and HOME funded activities. The highly competitive housing market, skyrocketing home prices and rising interest rates have also made it challenging to carry out homebuyer activities due to HOME purchase price limits, HQS requirements and income limits. While home prices are beginning to stabilize, high interest rates are still making mortgage payments unaffordable to many low- and moderate-income households.

In response to these challenges, the City increased funding for programs that respond to conditions worsened by the pandemic including rent assistance and supportive services. HOME-ARP funding has been used in 2022-23 to expand rent assistance and supportive services available in the City, and these programs will continue into 2023-24. HOME-ARP funds are included in Portland's plan as the Consortium Lead. The City is also working with subrecipients to identify areas where improvement is needed, offering technical assistance to service providers and brainstorming ideas for improving client participation going forward. During the 2023-24 budgeting process for CDBG funds, past performance data was used to prioritize projects that have historically met goals, or improved performance with technical assistance or program modifications. For the City's WELCOME HOME program, the maximum loan amount was increased from \$20,000 to \$40,000. This change proved successful in 2022-23 and increased the number of down payment assistance loans the program was able to provide.

Gresham and the Consortium Partners are committed to addressing the emerging and existing needs of the low-income residents of the community and furthering racial equity for the Black, Indigenous and People of Color (BIPOC) residents of the community. Several of Gresham's subrecipients offer culturally specific services and all provide informational materials in multiple languages and offer translation to clients as needed. Year after year, Gresham's subrecipients consistently serve Gresham's highest need populations including BIPOC residents, seniors, people with disabilities, and other marginalized groups.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Consortium follows the federally required Citizen Participation Plan to ensure citizen participation requirements are met or exceeded annually. The current CPP was adopted in the 2021-2025 Consolidated Plan. Due to the COVID-19 pandemic, the Consortium members has had to rely on virtual hearings, online surveys and remote consultations to solicit public comments and gather community input. Beginning January 1, 2023, public hearings were switched to a hybrid format with remote and in-person options for attendees.

Citizen Participation was conducted through two Community Need Hearings (one in Portland and one joint hearing for Gresham and Multnomah County), surveys and comment cards, consultations with citizen subcommittees and local service providers and local Action Plan and budget hearings. To ensure broader outreach to residents, the Gresham & Multnomah County consultation survey was offered in both English and Spanish and the comment card was available in English, Spanish, Simplified Chinese, Vietnamese and Russian.

The City of Gresham and Multnomah County held a joint Community Needs Hearing via Zoom on November 16th, 2022. A public notice for the meeting was posted in the Gresham Outlook on October 14th, 2022. The meeting was open to all community stakeholders and focused on needs specific to Gresham and East Multnomah County. Translation and accommodations were made available to interested participants upon request. The hearing was attended by service providers, representatives from community organizations and other community members. A link to the comment card to provide written feedback was included in all email invitations to the needs hearing and was provided to all attendees during the meeting.

A preliminary draft of Gresham's 2023-24 Annual Action Plan was made available on April 7, 2023. A public hearing for Gresham's 2023-24 Annual Action Plan was held on May 3, 2023 and Gresham City Council reviewed and approved the plan at a public meeting on June 20, 2023. The public comment period for Gresham's 2023-24 Annual Action Plan was April 7, 2023 to May 8, 2023. Comments were also accepted at the Gresham City Council meeting on June 20, 2023.

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.

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

Public comments received highlighted the need for a wide variety of services and infrastructure improvements in Gresham and East Multnomah County. Participants prioritized the need for homelessness prevention services, homeownership assistance to help stabilize households and public infrastructure improvements. Gentrification in Portland has continued to push lower income households to Gresham and East Multnomah County, but these areas do not have enough decent and affordable housing or services needed to support and stabilize these households. Commenters stressed the need for programs that provide housing assistance and eviction prevention along with supportive services to help stabilize program participants. Many comments received indicated a need for facilities, infrastructure improvements and services in the Rockwood neighborhood, including a community center, homeownership programs and services for youth. Gresham and East Multnomah County have many unmaintained roads and inadequate infrastructure for pedestrians and bicycles. Improving these facilities would make walking and bicycling safer and could help increase foot traffic to local businesses.

Commenters noted that marginalized groups, including BIPOC community members, regularly face housing discrimination both when they are looking to rent or buy a home. Often homes that are affordable are older and poorly maintained, which means low-income families have no choice but to live in substandard housing. Often landlords do not understand how housing vouchers or reasonable accommodations work, so tenants with vouchers or disabilities are often mistakenly discriminated against. Participants also noted that services need to be offered in culturally competent ways so that marginalized communities can access services.

Written responses through the City's comment cards and surveys indicated a need for new affordable housing developments with family sized units and services available to stabilize families housed in new units. Responses also noted a need services to prevent and alleviate houselessness, services to help households overcome the impacts of inflation, business assistance, job training programs and infrastructure improvements. A full summary of written comments received is include in the attachments.

No public comment was received at the Annual Action Plan public hearing on May 3rd, 2023.

At the City Council meeting on June 20th, 2023, the City recieved one written comment and four in-person comments at the Gresham City Council hearing for the CDBG and HOME Action Plan budgets. Comments expressed support for the proposed budgets and expressed how important programs that stabilize households are. Comments expressed support for the Willow Tree, Living Solutions and Proud Ground projects, all of which will be funded in 2023-24.

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

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

7. Summary

A preliminary draft of Gresham's 2023-24 Annual Action Plan was made available on April 7, 2023. A public hearing for Gresham's 2023-24 Annual Action Plan was held on May 3, 2023 and Gresham City Council reviewed and approved the plan at a public meeting on June 20, 2023. The public comment period for Gresham's 2023-24 Annual Action Plan was April 7, 2023 to May 8, 2023. Comments were also accepted at the Gresham City Council meeting on June 20, 2023.

Fall Community Needs Hearing (Gresham & Multnomah County)- November 16, 2022

Community Needs Comment Card- November 2022 to June 2023

Publication of Action Plan Draft- April 7, 2023

Gresham CDHS Action Plan Public Hearing- May 3, 2023

Gresham City Council Action Plan Meeting- June 20, 2023

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

As the designated lead agency for the Consolidated Plan, PHB coordinates and collaborates with the jurisdictional partners for plan preparation and relevant administrative tasks.

As the Consortium Lead, Portland handles the allocation and administration of HOME Funds, however Gresham selects its own projects detailed in an annual intergovernmental agreement with the City of Portland. Each of the three jurisdictional partners receive their own CDBG entitlement funds directly and allocate and administer respective allocations independently. The HOPWA and ESG funds are received by Portland and PHB assumes program administration lead. Since the creation of Joint Office of Homeless Services (JOHS) in 2016, a joint city-county agency, much of the HOPWA and ESG funds are passed on to this specialized agency for program implementation.

Consolidated Plan Public Contact Information

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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, emergency management, broadband needs and corrections programs. Consultations occur annually when preparing each Annual Action Plan. 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 aspects of needs and opportunities covered by the 2021-25 Consolidated Plan, including economic development, transportation, public services, special needs, homelessness, and housing. Needs far exceed resources so the Consortium members have worked together to make decisions and set long-term priorities. Coordination within the Cities also consisted of input and review from the Portland Housing Advisory Commission, the Fair Housing Advocacy Committee, the Federal Funding Oversight Committee, the City of Gresham Community Development and Housing Subcommittee and the Multnomah County Policy Advisory Board. Coordination with Home Forward and Housing, service-providing agencies, and other stakeholders are described below. Their comments and input are reflected in discussions throughout this Consolidated Plan.

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 from each of the Consortium Partners participate in regional planning efforts concerning all aspects of needs and opportunities covered by this Annual Action Plan and the 2021-25 Consolidated Plan, including housing, public services, homelessness, special needs, economic development and transportation. Significant resources are jointly planned and administered for homelessness prevention, emergency housing and supportive services. Coordination efforts and planning processes are reflected in discussions throughout this Consolidated Plan. In preparing the 2023-24 Annual Action 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, the CoC, the Fair Housing Advocacy Committee, Healthy Homes Coalition, and Oregon Housing (formerly 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 Annual Action Plan hearings. Consultations occurred with both housing and service providers, Home Forward (formerly Housing Authority of Portland), homeless persons, people with disabilities, and organizations that provide services to homeless families, people with alcohol or drug addictions, people with developmental disabilities, HIV affected families, the elderly, homeless adults, children and families and people with mental illness.

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

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

All three of our Consolidated Plan jurisdictions (Portland, Multnomah County, and Gresham) are represented on the Continuum of Care (CoC) Board and its Jurisdictional Committee which both meet monthly. The CoC was reorganized and relaunched in 2022. It 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 2021- 2025 Consolidated Plan priority needs and goals align with the COC effort. This alignment includes 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, including mitigating the overrepresentation of Black, Indigenous, and People of Color experiencing housing instability), as well as priorities 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.

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

Waiting for ESG update from Portland.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	211INFO
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships with the Consortium, meetings, and interviews.
2	Agency/Group/Organization	UNLIMITED CHOICES INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships, meetings, and surveys.

3	Agency/Group/Organization	AFRICAN AMERICAN ALLIANCE FOR HOMEOWNERSHIP
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis 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?	Consulted through regular consortium partnerships and meetings.
4	Agency/Group/Organization	Home Forward
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs 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?	Consulted through regular partnerships, meetings, plans and surveys. Home Forward also has a representative on the Consortium's Fair Housing Advocacy Committee, along with reps from each jurisdiction.

5	Agency/Group/Organization	CITY OF PORTLAND / BHCD
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing Other government - Local Community Development
	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 HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City of Portland is the Consortium lead and works closely with the Consortium partners on all aspects for the Consolidated Plan and Action Plans.
6	Agency/Group/Organization	WORKSYSTEMS INC.
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular Consortium partnerships, meetings and interviews.

7	Agency/Group/Organization	HOUSING DEVELOPMENT CENTER
	Agency/Group/Organization Type	Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular Consortium partnerships, meetings and plans.
8	Agency/Group/Organization	HACIENDA COMMUNITY DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular Consortium partnerships and meetings.

9	Agency/Group/Organization	MULTNOMAH COUNTY
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County
	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 HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Multnomah County is s Consortium Partner and works closely with the rest of the Consortium on all aspects for the Consolidated Plan and Action Plans.

10	Agency/Group/Organization	OREGON HOUSING AND COMMUNITY SERVICES
	Agency/Group/Organization Type	Housing Services - Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular Consortium partnerships, meetings, plans and interviews.
11	Agency/Group/Organization	STATE OF OREGON DEPARTMENT OF HUMAN SERVICES
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims Health Agency Child Welfare Agency Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA 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?	Consulted through regular Consortium partnerships, meetings, plans and interviews.
12	Agency/Group/Organization	FAIR HOUSING COUNCIL OF OREGON
	Agency/Group/Organization Type	Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular partnerships, meetings, plans and surveys. FHCO also has a representative on the Consortium's Fair Housing Advocacy Committee, along with reps from each jurisdiction.
13	Agency/Group/Organization	El Programa Hispano Catolico
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims Services- Culturally Specific
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships, surveys, and public meetings.
14	Agency/Group/Organization	INTERNATIONAL REFUGEE CENTER OF OREGON
	Agency/Group/Organization Type	Services - Housing Services-Education Services-Employment Regional organization Services- Culturally Specific
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular partnerships, surveys, and public meetings.
15	Agency/Group/Organization	HABITAT FOR HUMANITY PORTLAND
	Agency/Group/Organization Type	Housing Services - Housing Regional organization Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular partnerships, surveys, and public meetings.

16	Agency/Group/Organization	NATIVE AMERICAN YOUTH ASSOCIATION
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Employment Service-Fair Housing Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis 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?	Consulted through regular Consortium partnerships, surveys, and public meetings.
17	Agency/Group/Organization	HUMAN SOLUTIONS
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships, surveys, and public meetings.
18	Agency/Group/Organization	Proud Ground
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Regional organization Community Land Trust
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships, surveys, and public meetings.
19	Agency/Group/Organization	Family of Friends
	Agency/Group/Organization Type	Services-Children Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs 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?	Consulted through regular partnerships, surveys, and public meetings.
20	Agency/Group/Organization	Metropolitan Family Services
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Education Regional organization

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships, surveys, and public meetings.
21	Agency/Group/Organization	Friends of the Children
	Agency/Group/Organization Type	Services-Children Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships, surveys, and public meetings.
22	Agency/Group/Organization	COMMUNITY ENERGY PROJECT
	Agency/Group/Organization Type	Housing Services-Education Regional organization Services- Resource Conservation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis 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?	Consulted through regular partnerships, surveys, and public meetings.

23	Agency/Group/Organization	Micro Enterprise Services of Oregon
	Agency/Group/Organization Type	Services-Education Services-Employment Business Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis 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?	Consulted through regular partnerships, surveys, and public meetings.
24	Agency/Group/Organization	Eastside Timbers
	Agency/Group/Organization Type	Services-Children
	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?	Consulted through regular partnerships, surveys, and public meetings.
25	Agency/Group/Organization	Zipty Fiber
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Economic Development Broadband Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Zipty was contacted to request consultation on broadband needs in Multnomah County.
26	Agency/Group/Organization	Rockwood Preparatory Academy
	Agency/Group/Organization Type	Services-Children Services-Education

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs 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?	Consulted through regular partnerships, surveys, and public meetings.
27	Agency/Group/Organization	Cultivate Initiatives PDX
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health Services-Education Services-Employment
	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?	Consulted through regular partnerships, surveys, and public meetings.
28	Agency/Group/Organization	Boys & Girls Club
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children 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?	Consulted through regular partnerships, surveys, and public meetings.

29	Agency/Group/Organization	Beyond Black
	Agency/Group/Organization Type	Services-Education 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?	Consulted through regular partnerships, surveys, and public meetings.
30	Agency/Group/Organization	Rockwood Community Development Corporation
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular partnerships, surveys, and public meetings.
31	Agency/Group/Organization	Gresham Neighborhood Coalition
	Agency/Group/Organization Type	Housing Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted through regular partnerships, surveys, and public meetings.
32	Agency/Group/Organization	REAP Inc.
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children 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?	

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

No agency types were intentionally excluded from consultation.

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	Basic services & homeless prevention/intervention (Need); Reduce homelessness and increase stability (Goal)
Moving to Work	Home Forward	Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)
Analysis of Impediments to Fair Housing	Portland Consortium	Affordable housing choice (Need); Increase and preserve affordable housing choice (Goal)Basic services & homeless prevention/intervention (Need); Reduce homelessness and increase stability (Goal)Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
A Home for Everyone: A United Community Plan	Multnomah County	Basic services & homeless prevention/intervention (Need); Reduce homelessness and increase stability (Goal)
Community Economic Development Plan	Prosper Portland	Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)

Table 3 - Other local / regional / federal planning efforts

Narrative

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

Citizen participation was encouraged through two Community Needs Hearings, three jurisdictional Action Plan Hearings, the Portland budget hearing and a Gresham City Council meeting as well as surveys, comment cards and service provider consultations. Events and opportunities to comment were advertised in the Portland Tribune, the Gresham Outlook, on the jurisdiction websites and through newsletters and email lists. Gresham and Multnomah County's online survey was available in English and Spanish and comment cards were translated into Spanish, Simplified Chinese, Russian and Vietnamese to encourage participation from diverse members of the community. Service providers consulted included those who provide culturally specific services and services tailored to the needs of BIPOC residents, immigrants, refugees, people with disabilities, houseless individuals and families and other marginalized groups.

Accessibility accommodations and translation are offered for all meetings. Due to the pandemic, some public meetings were held remotely in the 2022-23 program year. Beginning January 1, 2023, all public hearings were offered in a hybrid format with remote and in-person attendance opportunities. When in-person meetings are held all meeting locations are ADA accessible.

The consortium partners also consulted with existing citizen committees and task forces that address community needs relevant to this Action Plan. The consortium partners are all participating members of the Fair Housing Advocacy Committee, a Portland committee that includes jurisdictional representatives from Gresham and the County, as well as community members and representatives from local service providers.

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
1	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	November 16, 2022 Community Needs Hearing: 13 community stakeholders, 2 Gresham City Councilors and 6 jurisdictional staff attended the Multnomah County and City of Gresham needs hearing.	Attendees stressed a need for community services and infrastructure improvements, particularly in high need areas of Gresham like the Rockwood area. Housing services to assist unhoused populations, prevent eviction and provide wrap around services in connection with housing assistance were identified as a priority, as well as services for youth and economic development services to help residents increase their earning potential. Attendees also noted a need for infrastructure improvements that make traveling safer for bicyclists and pedestrians, including bike lanes, sidewalks, better lighting and traffic calming improvements. A full summary of comments is provided in the attachments.	All comments were accepted.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
2	Public Hearing	Non-targeted/broad community	May 3, 2023 Community Development & Housing Subcommittee Public Hearing for the 2023-2024 Annual Action Plan: 6 members of the Community Development & Housing Subcommittee, 2 City Councilors and 2 City Staff Members attended the public hearing.	No comments were received at this hearing.	All comments were accepted.

3	Internet Outreach	<p>Non-English Speaking - Specify other language: Spanish, Russian, Vietnamese, Simplified Chinese</p> <p>Non-targeted/broad community</p> <p>Local Service Providers</p>	<p>Community Needs Survey and Comment Card, November 2022 to May 2023. The comment card was available as an online survey and a fillable PDF that could be completed via computer and emailed or printed and mailed into the jurisdictions. Information on how to comment with links to the City's website and online surveys were provided to the Community Revitalization contact list, which includes subrecipients, local non-profits and other stakeholders who has expressed interest in the Annual Action Plan.</p>	<p>Comments received addressed a wide range of needs including housing, homelessness, public services, economic development and infrastructure needs. A full summary of comments is provided in the attachments.</p>	<p>All comments were accepted.</p>
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
4	Public Meeting	Non-targeted/broad community	June 20, 2023- Gresham City Council Meeting	The City received one written comment and four in-person comments at the Gresham City Council hearing for the CDBG and HOME Action Plan budgets. Comments expressed support for the proposed budgets and expressed how important programs that stabilize households are. Comments expressed support for the Willow Tree, Living Solutions and Proud Ground projects, all of which will be funded in 2023-24.	All comments were accepted.

Table 4 – Citizen Participation Outreach

Expected Resources

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

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	1,040,018	0	350,856	1,390,874	2,080,036	Expected amount available for the remainder of the Con Plan only factors in EN each year and assumes EN will remain level for the rest of the Con Plan. Prior year resources include uncommitted funds carried over from previous program years. \$166,992 of the prior year resources are from the Parks Improvement Project, which was included in the 2020 AP and will span the entire 2021-2025 Con Plan. The 2022-23 Streetlight Infill project is also carrying over \$141,839, which will remain in that project in 2023-24. The City hopes to break ground on both carried over projects in 2023-24.

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 independently, and as part of the HOME Consortium with the City of Portland and Multnomah County, makes every effort to leverage HUD grant funds with other public and private investments. Housing development and rehabilitation activities are highly leveraged because public funds are used as “last in” gap financing amounts, which requires that more substantial investments are in place. In the 2022-2023 fiscal year, Gresham projects included leveraged funds from other sources, nearly doubling the amount of funding put into the projects. 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 publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Gresham regularly plans public infrastructure improvements on publicly owned land. Current projects in the 2023-24 Action Plan on publicly owned land include the Parks Improvement project, which will improve an existing Gresham public park, and the Street Lighting Improvements project, which will add streetlights in residential neighborhoods in the public right of way. Whenever opportunities arise publicly owned land and property will be included to the extent practicable.

Discussion

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase & preserve affordable housing choice	2021	2025	Affordable Housing Public Housing Homeless		Affordable housing choice	CDBG: \$302,192	Public service activities other than Low/Moderate Income Housing Benefit: 85 Persons Assisted Rental units rehabilitated: 12 Household Housing Unit Homeowner Housing Rehabilitated: 36 Household Housing Unit
2	Reduce homelessness & increase stability	2021	2025	Homeless Non-Homeless Special Needs		Basic services & homeless prevention/intervention		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Infrastructure, facilities & economic opportunity	2021	2025	Non-Housing Community Development		Community & economic development	CDBG: \$1,088,682	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 44200 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted Businesses assisted: 45 Businesses Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Increase & preserve affordable housing choice
	Goal Description	Includes \$45,192 in administration. Admin has been split proportionally between goals based on the amount of CDBG funds allocated to each goal. Accomplishments for Adapt-A-Home are split between the Rental units rehabilitated and Homeowner Housing rehabilitated GOIs because the program assists both renters and homeowners. The annual goal of 24 households served has been divided 50/50 between the two GOIs.
2	Goal Name	Reduce homelessness & increase stability
	Goal Description	Activities funded under this goal are funded with HOME and HOME-ARP funds, so they are not included in Gresham's Action Plan. These projects will be included in the City of Portland's plan as the consortium lead.

3	Goal Name	Infrastructure, facilities & economic opportunity
	Goal Description	<p>Includes \$162,811 in administration. Admin has been split proportionally between goals based on the amount of CDBG funds allocated to each goal.</p> <p>Accomplishment goals include a goal for the Streetlight Infill project which was not completed in 2022-23 and is carrying over into 2023-24.</p>

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AP-35 Projects - 91.420, 91.220(d)

Introduction

The 2023 Annual Action Plan outlines projects addressing needs identified in the 2021-2025 Consortium Consolidated Plan, opportunities in Gresham and City priorities. Initial project recommendations were made in consultation with the Community Development and Housing Subcommittee which reviewed and evaluated applications. Part of the review process was consideration of the ability of local and regional agencies and partners to successfully achieve objectives and administrative demands, including monitoring. The City Council made the final decisions on projects.

Goal 2- Reduce Homelessness & Increase Stability is not addressed by any projects included in this section. Projects addressing this goal are being funded with HOME and HOME-ARP funds, so they are included in Portland's Action Plan as the Consortium Lead.

#	Project Name
1	2023 Gresham Administration
2	2023 Consolidated Plan & Action Plan Coordination
3	2023 Adapt A Home
4	2023 Mend A Home
5	2023 Living Solutions
6	2023 AARP Experience Corps Mentoring
7	2023 Eastside Timbers
8	2023 DIY Weatherization Workshops
9	2023 MESO Microenterprise Assistance
10	2020-2025 Park Improvements Project
11	2022 Streetlight Improvements

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 9-person citizen advisory group, along with scoring and review by a technical advisory group made up of internal finance and program staff. Further, the City gives priority to projects that promote investment in low-income neighborhoods, leverage additional revenue to stimulate private development, create affordable housing or support other CDBG priorities.

Obstacles to addressing underserved needs include the historical decreases in CDBG and HOME funding. While funding has remained level in recent years, inflation, rising rents, and increasing population in Gresham mean there is an increased demand for funding. The cost of providing services,

developing affordable housing, funding homeownership programs and completing infrastructure projects continues to rise, so while funding remains level, fewer community members can be served.

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AP-38 Project Summary

Project Summary Information

1	Project Name	2023 Gresham Administration
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Community & economic development
	Funding	CDBG: \$203,003
	Description	General management, oversight and coordination, staffing of advisory committee (CDHS), contract preparation & compliance, environmental reviews & management of the subrecipient selection process.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This is an admin activity, so it will not directly benefit any community members.
	Location Description	1333 NW Eastman Parkway, Gresham, OR 97030
	Planned Activities	General Administration
2	Project Name	2023 Consolidated Plan & Action Plan Coordination
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Community & economic development
	Funding	CDBG: \$5,000
	Description	Payment to City of Portland (PHB) for Consolidated Plan/Annual Action Plan coordination with the consortium members and administration of the countywide advisory committee.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	This is an admin activity, so it will not directly benefit any community members.
	Location Description	
	Planned Activities	General Administration
3	Project Name	2023 Adapt A Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$120,000
	Description	Home accessibility modifications such as ramps, grab bars and roll in showers for 24 low- and moderate-income seniors and people with physical disabilities. Clients may be homeowners or renters and the outcomes for this project will be split between renters and homeowner. For rental units the landlord will agree to keep accessibility improvements in place to create a permanently accessible unit. Accomplishments for this project are split between two GOIs because the project serves both renters and homeowners.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 24 households with accessibility modifications. Clients served will primarily be low- or very low-income, with participants being at or below 60% MFI. One or more member of each household served will be a person with a disability or a senior citizen.
	Location Description	Scattered sites city-wide in Gresham.
	Planned Activities	Minor Home Rehab and related Rehab Admin
4	Project Name	2023 Mend A Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$120,000

	Description	Critical home repairs for 24 low- and moderate-income homeowners and mobile home owners so that they can continue to live in the Gresham community in a safe, secure and functional home. Repairs covered will include items that are necessary to maintain the safety and livability of the home such as roof, plumbing and electrical repairs.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will serve 24 households with emergency home repairs. All clients served will be low- or very low-income with all clients being at or below 60% MFI. Beneficiaries of this project are usually seniors or people with disabilities living on fixed incomes. This project will primarily serve mobile homeowners, but may serve homeowners with single family homes as well.
	Location Description	Scattered sites city-wide in Gresham
	Planned Activities	Minor Rehab and related Rehab Admin
5	Project Name	2023 Living Solutions
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$199,099
	Description	Living Solutions will provide employment services to 50 Gresham residents with incomes under 30% MFI. Services include assistance getting into career training programs such as apprenticeships and college courses, English classes, technology training, assistance with barriers to securing employment such as transportation or supplies, Career Mapping, employment plan development, job search assistance, online job application assistance and mock interviews. This includes serving individuals within Gresham's immigrant and refugee community.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	This program will serve 50 Gresham individuals. Individuals served will primarily be very low-income and will likely face barriers to living wage employment.
	Location Description	Gresham, City-wide
	Planned Activities	Job Training & Placement

6	Project Name	2023 AARP Experience Corps Mentoring
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$22,000
	Description	Funds will be used to recruit and train senior mentors to support 100 at risk kindergarten to 3rd grade students at Gresham elementary schools. The activity carried out for this project will be a public service activity.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will serve approximately 100 students in K to 3rd grade classrooms at one or more elementary schools in Gresham with high levels of poverty.
	Location Description	19501 NE Davis St, Gresham
	Planned Activities	Youth Services (Tutoring & Mentoring)
7	Project Name	2023 Eastside Timbers
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$50,000
	Description	After school soccer program and/or recreational league soccer scholarships for 300 low- and moderate-income Gresham youth. the activity for this project will be a public service activity.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will serve up to 300 children who live in Gresham and/or attend Gresham schools. Over half of the children served will come from households at or below 80% MFI.
	Location Description	Gresham City-wide, scattered sites 4710 SE 174th Ave, Gresham

	Planned Activities	Youth Services (Soccer Program)
8	Project Name	2023 DIY Weatherization Workshops
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$17,000
	Description	Training workshops to teach Gresham residents how to weatherize their homes to keep them more comfortable in the winter, lower energy bill costs and conserve energy. Low- and Moderate-income households will be provided with a kit containing weatherization materials to take home. The activity carried out for this project will be a public service activity.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will serve 85 Gresham households that are at or below 80% MFI.
	Location Description	City-wide, scattered sites
	Planned Activities	Other Public Services (Education)
9	Project Name	2023 MESO Microenterprise Assistance
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$80,300
	Description	Technical assistance for 45 microenterprises to assist low- and moderate-income Gresham entrepreneurs with starting or growing their small businesses.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 45 small business owners whose household income is at or below 80% MFI. Businesses served must have 5 or fewer employees including any business owners.

	Location Description	Gresham City-wide, scattered sites
	Planned Activities	Microenterprise Assistance
10	Project Name	2020-2025 Park Improvements Project
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$432,633
	Description	Infrastructure improvements for Gresham parks serving low- and moderate-income neighborhoods. Note: \$166,992 of the funds in this project were allocated in prior years. An additional \$265,641 in 2023-24 funds will be added to the existing project. Sidewalk infill to improve safe pedestrian access to Rockwood Central Park.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	The Rockwood Central sidewalk infill is estimated to serve 35,000 individuals living within walking distance (1 mile) of the project site.
	Location Description	Yamhill from Rockwood Central Park to 182nd Ave, Gresham
	Planned Activities	Infrastructure Improvements (Sidewalk Infill)
11	Project Name	2022 Streetlight Improvements
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$141,839
	Description	Infrastructure improvements to add lighting in the public right of way in low-income residential neighborhoods to improve safety and visibility. Note: This is a 2022-23 project that will continue into 2023-24. No new funds are being allocated to this project.
	Target Date	6/30/2024

Estimate the number and type of families that will benefit from the proposed activities	Infrastructure improvements are estimated to benefit approximately 9,200 residents living in the vicinity of the three infill sites.
Location Description	SE Grant St & SE 189th Ave, extending West off of 190th Ave NE Everett Ln, between NE 197th Ave and NE 199th Ave SE 182nd Ave, along the Centennial High School frontage
Planned Activities	Infrastructure Improvements (Streetlight Infill)

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 available to low-income people and/or occurring in qualifying low-income neighborhoods. The City has set as a priority investing in community infrastructure development and redevelopment in lower-income neighborhoods to safeguard public health, improve livability and promote economic development. Where possible, funds will be leveraged to make substantial improvements in those areas, including increasing economic opportunities. The City works with regional partners to make significant improvements along transportation corridors and in areas targeted for urban renewal, including Rockwood, the Civic Neighborhood, and Downtown. The City will continue to view projects with the objective maximizing impact from investment.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Gresham does not allocate investments to specific geographic areas at this time. According to HUD's Low- and Moderate-Income Summary Data, Gresham as a whole is 55.83% low- and moderate-income, so there are many neighborhoods spread throughout the City that can benefit from CDBG-funded improvements.

Discussion

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

Introduction

The City of Gresham is dedicated to addressing the community's complex housing challenges. Gresham City Council identified "Housing for All" as a priority in the Gresham Strategic Plan 2022-25 ("Strategic Plan"). The Strategic Plan is a three-year plan that identifies priorities that the City will focus resources on through 2025. This plan is carried out through annual action plans that describe how the City will make progress on Strategic Plan goals each year. The 2022-23 action plan includes three strategic objectives to support the "Housing for All" priority including providing resources to those experiencing homelessness or housing insecurity, promoting and supporting affordable housing development and serving as a community partner to support housing stability. City staff that carry out work on these objectives participate in monthly Housing for All Collaborative to track progress, coordinate work and discuss strategies in achieving the objectives outlined in the Strategic Plan. This work will continue into 2023-24.

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 Oregon State legislature passed House Bill 2001 and House Bill 2003, both aimed at helping local communities meet the diverse housing needs of Oregonians. House Bill 2001 expands the ability of property owners to build more affordable housing types in all residential zones. These types of homes already exist in most cities but have been prohibited in many neighborhoods due to zoning requirements. Under this new rule larger Oregon cities and cities in the Portland Metro region must allow duplexes, triplexes, quadplexes, cottage clusters and townhouses in residential areas. This requirement became effective June 30, 2022. Gresham recently adopted new code changes to ensure compliance with the new state requirements. The changes aim to create more opportunities for renters and homeowners at different income levels and increase the variety of housing available in Gresham.

House Bill 2003 requires all Oregon cities with a population over 10,000 people to study the housing needs of their residents and develop and implement strategies to encourage housing production to meet the community's needs. In accordance with this rule, the City of Gresham completed the 2021-2041 Housing Capacity Analysis, which determined the City will need over 6,000 additional housing units over the next 20 years. Between early 2022 and Fall 2022, City staff worked to engage community members, gather feedback, and assess strategies to meet future housing needs in Gresham in order to create a Housing Production Strategy (HPS). Gresham City Council reviewed and adopted the HPS

at a public hearing on June 6, 2023.

The City also continues to administer several housing related programs internally to promote safe and affordable housing in Gresham. Since 2007, the City's Rental Inspection Program has helped ensure existing rental units are safe and habitable with regular mandatory rental unit inspections. This program is described in more detail in the AP-85. Since 2015, the City's WELCOME HOME program has provided down payment assistance loans to Gresham households at or below 80% median family income. Prior to the implementation of the WELCOME HOME program the City provided down payment assistance through other programs including several Habitat for Humanity developments. The City also funds local a community land trust, Proud Ground, to provide homebuyer assistance and create permanently affordable homes in Gresham.

The City is also providing HOME funds to an affordable housing development project in 2023-24. This project is included in Portland's Annual Action Plan as the consortium lead. Advocates for Life Skills & Opportunity (ALSO) will partner with developers to construct a 39-unit affordable housing project. The project will include one-, two- and three-bedroom units at rents affordable to households at 60% median family income and will also set aside 10 units for persons with intellectual and developmental disabilities. HOME funds will subsidize 3 to 4 units in this project.

Discussion

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

Introduction

While poverty levels in Gresham, and statewide in Oregon, have been decreasing, the Portland Metro region is a high cost of living area and federal poverty levels are not the best indicator to determine whether the percentage of lower income households in the region is decreasing. Based on income limits for the area, most households making 300% of the federal poverty level or less are at or below 80% median family income for the Portland Metro region. According to the 2021 American Community Survey 5-year estimates, over half of Gresham residents are below 300% of the federal poverty level. Gresham has a relatively lower cost of living than many surrounding areas and as a result, more lower income households are moving into Gresham to find affordable housing, including that affordable to working families. The City prioritizes projects to assist community members to achieve stabilization, self-sufficiency and increase earning capacities. Projects that stabilize households are essential, especially in the wake of the COVID-19 pandemic, for preventing homelessness, improving the mental health of household members, and ensuring families can overcome unexpected crises. 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.

In addition to the “Housing for All” priority mentioned previously, Gresham City Council’s Strategic Plan identifies “Thriving Economy” and “Community Vibrancy” as priorities. The “Thriving Economy” priority aims to promote economic growth in Gresham and improve overall community wealth. Gresham supports this priority through the work done under each Annual Action Plan by supporting projects that provide small assistance and job training and placement to help low-income business owners and residents increase their earning potential. The “Community Vibrancy” priority focuses on improvements to neighborhoods to help bring communities and cultures together to create a shared sense of belonging. The Annual Action Plan supports this priority by funding recreation opportunities for youth and public facilities improvements such as park improvements.

Actions planned to address obstacles to meeting underserved needs

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

regarding safety, economic development, community enrichment and housing.

Actions planned to foster and maintain affordable housing

The City of Gresham supports quality housing that is affordable to all residents. Since 2007 the City has operated the Rental Inspection Program, which results in periodic inspections for compliance with a broad range of habitability standards. Along with random mandatory inspections, the program will inspect rental units based on tenant habitability complaints. Common violations found and corrected are visible mold, inadequate ventilation, illegal heat sources, plumbing disrepair, inoperable smoke detectors, and exposed wiring. In 2020, Gresham City Council passed two code changes relating to the Rental Inspection Program. One requires landlords to present tenants with an informational handout titled, “Rights & Responsibilities of Landlords & Tenants” upon execution or renewal of a lease. The intent of the form is to increase both tenant and landlord knowledge of their respective responsibilities and rights. The form also includes a list of local resources. The second change to City code assesses a fine upon property owners if a court determines they have retaliated against a tenant.

The City funds Unlimited Choices to provide rehabilitation of units to ensure permanent accessibility for persons with disabilities and home repair assistance for lower-income households. The City also assists lower-income homebuyers with HOME funds through the WELCOME HOME down payment assistance program and through Proud Ground.

In 2018 metro-area voters passed the Regional Affordable Housing Bond, which provides funding for the development of affordable housing. Gresham has collaborated with Metro to create an Intergovernmental Agreement for this funding and develop a plan that addresses local needs to utilize its share of this funding. To date, Gresham has completed two projects with these funds, Albertina Kerr’s Wynne Watts Commons and Rockwood Village. Wynne Watts Commons consists of 150 new apartments, of which 147 are bond funded and 30 are deeply affordable (30% AMI) IDD units. It is the largest net zero energy affordable housing project in the Pacific Northwest, powered entirely by solar energy. Rockwood Village has a total of 224 units, 47 of which are bond funded and deeply affordable (30% AMI) units. The development includes 23 units that are three- or four-bedroom units for larger families and the site also provides easy access to public transportation and green space. The City has \$10.6 million remaining to invest in housing projects and on June 6, 2023, Gresham City Council approved four projects, two homeownership and two rental housing, to utilize the remaining funds.

May 2020, Metro voters passed ballot measure 26-210, the Supportive Housing Services Measure, which is projected to generate as much as \$248 million a year across the region. Funds are being used to expand existing programs and support new services, with the goal of ending chronic homelessness in the region. Metro began disbursing funds in Summer 2021. Each of the three counties within Metro’s jurisdiction submits an annual work plan on April 1 of each year, which describes the annual accomplishment goals for Supportive Housing Services funds for the following fiscal year. Between July 1 2021 and December 31, 2022, Multnomah County used these funds to place 1,563 people in housing,

prevent eviction for 9,348 households and create or sustain 616 shelter beds.

The City adopted several guiding principles regarding housing which recognize that everyone in Gresham deserves a decent, safe and affordable place to live and that sustainable and vibrant communities require a balance of jobs, housing and services. The City is committed to fostering housing options that working individuals and families can afford and will look for new opportunities to preserve and expand housing options for all residents.

Actions planned to reduce lead-based paint hazards

Local housing programs refer low-and moderate-income households to the Portland Lead Hazard Control Program for grants to remediate lead-based paint hazards in housing where children under the age of 5 visit or reside and/or a pregnant person resides. This program is available to homeowner occupied units and rental units when the unit is occupied by a household at or below 80% MFI. In many housing units when the Lead Team finds issues of home repair and/or code violations, the staff try and assist with complimentary programs that are based on local resources.

In Gresham, CDBG funded projects providing rehab (not to exceed \$5,000) follow lead-safe work practices whenever the unit was built before 1978. For HOME funded homebuyer activities, a visual lead-based paint inspection is conducted for all properties purchased.

Actions planned to reduce the number of poverty-level families

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

The City has worked with regional partners to improve the transportation system, notably the bus-rapid-transit system (BRT) along Powell and Division and to the employment campuses in northeast Gresham, including Mt. Hood Community College. The BRT project laid the foundation for TriMet FX with offers faster, higher tier, high-capacity bus service on the Division corridor between Gresham and Downtown Portland. Service on this line opened in September 2022 and provides buses arriving every 12 minutes.

The City sponsors the Garage to Storefront program to encourage small businesses by offering waivers for business license fees and permit fees for remodeling and facade improvements for vacant and some occupied business spaces in target areas. Target areas include Central Rockwood, the Civic Neighborhood and Downtown Gresham. In 2022 this program was accessed by 15 small businesses, saving them a total of \$22,290 in permit and miscellaneous fees. The Garage to Storefront program was renewed through 2023. In Spring 2020, the City also launched a Small Business Grant program to

provide critical working capital funds to small businesses suffering from financial hardship as a result of the COVID-19 pandemic. As of May 2020, 820 businesses had been assisted to the benefit of both the businesses and the community. In 2021-22, the City allocated an additional \$500,000 in ARPA funds, with half earmarked for BIPOC, Women and Veteran-owned businesses, for an additional round of business grants. These funds were awarded to 77 Gresham businesses. Additionally, the City's Small Business Center and Urban Planning Department assisted 12 microenterprises with getting their business licenses and permits to open their businesses at the new Rockwood Market Hall.

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

Actions planned to develop institutional structure

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

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

In 2022, the City added a Housing Resources Coordinator position to assist residents in navigating housing resources available to Gresham residents. While this position does not place residents in housing, they do connect callers with appropriate resources and can often make referrals to programs providing various forms of assistance, helping community members access critical resources they may not have otherwise been aware of. Additionally, the City maintains a Homeless Services team that

provides outreach and resource referrals to people experiencing houselessness in Gresham.

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

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

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

For Metro Housing Bond projects, the City prioritized projects that included services for residents. Both completed developments offer supportive services for vulnerable populations. Albertina Kerr's Wynne Watts Commons includes 30 permanent supportive housing accessible units for people with intellectual and developmental disabilities and it is located on the same site as their existing Gresham campus. Rockwood Village includes services from Hacienda CDC, including support for residents of all ages and entrepreneurial services.

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%



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 P.O. Box 22109, Portland, OR 97269-2163
 Phone: 503-684-0360 Fax: 503-620-3435
 Email: legals@commnewspapers.com

AFFIDAVIT OF PUBLICATION

State of Oregon, County of Multnomah, Clackamas, SS I Charlotte Allsop, being the first duly sworn, depose and say that I am the Accounting Manager of the **Gresham Outlook**, a newspaper of general circulation serving Gresham in the aforesaid county and state, as defined by ORS 193.010 and 193.020, that:

**City of Gresham
 Notice of Community Needs Virtual Hearing
 Annual Action Plan FY 2023-24
 Ad#: 261410**

A copy of which is hereto annexed, was published in the entire issue of said newspaper(s) for 1 week(s) in the following issue(s):
10/14/2022

Charlotte Allsop
 Charlotte Allsop (Accounting Manager)

Subscribed and sworn to before me this
 10/14/2022.

[Signature]
 NOTARY PUBLIC FOR OREGON

Act # 100687
Allan Rachel Nehse
 GRESHAM, CITY OF COMMUNITY DEVELOPMENT
 1333 NW EASTMAN PKWY
 GRESHAM, OR 97030



Notice of Community Needs Virtual Hearing
Annual Action Plan FY 2023-24

The Portland Consortium, which includes the City of Gresham, City of Portland and Multnomah County, is beginning its Annual Action Plan process for FY 2023-24. The 2023-24 Action Plan is the first of two Action Plans in the 2021-25 five-year Consolidated Plan. The process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the federal Department of Housing and Urban Development (HUD)'s formula block grant programs, Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), HOME Investment Partnerships American Rescue Plan (HOME-ARP), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA), to address ascertained community needs.

The purpose of these hearings is to collect community feedback regarding the housing, infrastructure, economic and social service needs of area residents and prioritize those needs during the preparation of the consortium partners' 2023-24 Action Plans. The Gresham & Multnomah County hearing will be held remotely via Zoom and the Portland hearing will be hybrid, with opportunities to attend remotely or in-person. For each jurisdiction, call or review website for instructions regarding public hearing, meeting times, website registration and phone information. The two upcoming opportunities to attend a public hearing in your community and give your feedback are:

City of Gresham & Multnomah County Community Needs Hearing
Wednesday, November 16, 2022, 5:30 P.M.-7:00 P.M. via Zoom
 To register in English: <https://tinyurl.com/CommunityNeeds22/>
 Para registrarse en español: <https://tinyurl.com/Comunidad22/>

The City of Gresham and Multnomah County, we committed to providing meaningful access. To request braille, interpretation, modifications, accommodations, or other auxiliary aids or services, call 503-678-2814 or email Rachel.Nehse@GreshamOregon.gov. Free "508.pdf" to fill out here:

For additional information on the Consolidated Plan process in the Gresham & Multnomah County community hearing contact Rachel.Nehse@GreshamOregon.gov (Gresham) and janey.gardner@multco.gov (Multnomah County).

City of Portland Community Needs Hearing
 Date TBD

The City of Portland Community Needs Hearing for HUD Federal funds will be held on a date to be determined. Contact Uma.Krishnan@PortlandOregon.gov for any additional information on the community programs.

The City of Portland is committed to providing meaningful access. To request braille, interpretation, modifications, accommodations, or other auxiliary aids or services, contact 503-823-6312, or Relay: 711, those days prior to the meeting.

Filed for June 14, 2022 01/14/2022

Multnomah County & Gresham Community Needs Hearing

November 16, 2022

5:30 PM – 7:00 PM

Meeting held remotely via Zoom

Gresham Facilitators & Staff: Ashley Miller, Rachel Nehse, Lauren Moran

Multnomah County Facilitators & Staff: Fanny Adams, Peggy Samolinski, Troy Hollis

Gresham City Councilors: Councilor Dina DiNucci, Councilor Jones-Dixon

Summary

Attendees participated in a group discussion to share their experiences in the community with City and County staff. Facilitators asked a series of questions to gather input and took notes to accurately record and summarize the groups' discussions. Following the discussion polls were used to determine participants' priorities. Overall, 13 individuals participated in the discussion and 11 participated in the polls. Attendees included local service providers, representatives from community organizations and other community members.

Community Services

- **Rockwood:** Attendees noted a need for more services and community facilities in the Rockwood neighborhood including a community center, increased police services, homeownership assistance programs and services for kids. Rockwood has unique needs that are different from Gresham as a whole, so services tailored to the needs of the neighborhood are essential.
 - *Rockwood Elementary:* The gym and field space at Rockwood Elementary will be converted into a community center, but the project could use support from the City.
- **Housing Programs with Services:** Housing assistance needs to include funding for ongoing supportive services for residents, especially residents with children.
- **Parks Programing:** The existing parks in the area lack funding for programming.
- **Fair Housing Services:** The Fair Housing Council of Oregon provides assistance, but many residents don't know their services are available.
- **Houselessness:** Houselessness is a persistent problem in the metro region and there is a high need for services that help people out of houselessness. The area lacks houseless services for youth and families to meet their everyday needs.
- **Eviction Prevention & High Rents:** Services that prevent houselessness are needed because eviction moratoriums have expired, and rent is increasing rapidly. Legal services to prevent unfair evictions and programs that help alleviate the rent burden are a high need. New affordable housing development takes too long and wait lists for housing vouchers can take years before a household is approved for assistance.
- **Flexible Funding for Services:** More flexible funding sources for programs are needed. HUD funds often come with strict rules and regulations regarding

eligible costs and what clients can be served, so HUD-funded programs often leave an unmet need.

Economic Development

- **Business Assistance Programs:** There's a community need for business assistance programs that help existing small businesses grow, bring jobs to the area and meet other community needs.
 - *Rockwood Food Desert:* Rockwood lacks grocery stores and could benefit from programs and investments that bring businesses to the neighborhood so that residents can purchase food and groceries near their homes.
 - *Thrift Stores & Social Services:* Businesses or non-profits that provide low-cost or free home goods and furnishings are needed in low-income areas. Personal items are often ineligible costs, so having access to businesses that provide these services is essential when moving families out of homelessness.
- **Infrastructure Improvements:** Creating improvements that make neighborhoods like Rockwood more walkable could help new and existing businesses get more foot traffic.

Infrastructure Improvements

- **Unimproved Roads:** East County has many unimproved roads that need to be paved.
- **Pedestrian & Bike Infrastructure:** Adding infrastructure that improves safety for bikes and pedestrians is a high need. Participants mentioned reconnecting North and South Rockwood with an overpass for bikes and pedestrians, adding islands on busy streets (especially near apartment complexes), and improvements on main arterial or collector streets, such as 182nd Ave.
- **Columbia Corridor Transit Project:** Participants expressed concerns that this project could limit walkability and further divide low-income neighborhoods.
- **Traffic Calming:** There are many unsafe areas where people drive too fast or in an unsafe manner, but there isn't infrastructure added to help calm traffic. Participants highlighted Highway 26, 172nd Ave near H.B. Lee Middle School and 162nd Ave as areas of concern.

Housing & Barriers to Housing Choice

- **Income Limits:** Income limits for programs funded with certain funding sources are lower than they should be because the limits are only updated annually, so they're always based on last year's median family income.
- **Concentrations of Poverty:** Affordable housing tends to be concentrated in specific areas that are already primarily low-income. There is a need for mixed income neighborhoods because low-income areas often lack advocacy for improvements, services and infrastructure for the area.
- **Rent Calculations for Voucher Holders:** Landlords don't know how to properly factor housing vouchers into their income/rent requirements for rentals, which results in voucher holders being unfairly rejected for units they should qualify for.

- **Reasonable Accommodations:** Landlords often do not understand the rules around reasonable accommodations for tenants with disabilities and unfairly deny accommodations.
- **Culturally Competent Services:** Housing services need to be culturally competent because certain populations face different barriers and need to be assisted in different ways. Many people can't identify the ways in which they're being treated unfairly, and some populations have difficulty accessing on-line or phone services and prefer in-person services in their primary language. For community members who aren't citizens, lack of documentation is often a barrier to housing and partnerships with organizations that provide alternative routes to housing are needed for these populations.
- **High Costs:** Many people are struggling to pay high rents while also covering other essentials such as utilities and food. High inflation has worsened these issues and inclement weather puts lower-income households at-risk when they cannot afford high heating or cooling bills and are more likely to live in older units without adequate insulation.

Priorities

Participants answered three questions to vote on their top three priority needs in Gresham & Multnomah County. The tables below show individual rankings for each question and an overall weighted ranking that encompassing responses for all three questions.

First Priority Needs	% of Votes
Homelessness Prevention	45.4%
Homeownership	27.3%
Public Infrastructure	27.3%
Affordable Rental Housing	0%
Economic Development	0%
Emergency Shelter	0%

Second Priority Needs	% of Votes
Affordable Rental Housing	27.3%
Homeownership	27.3%
Public Infrastructure	18.3%
Economic Opportunity	9%
Homelessness Prevention	9%
Emergency Shelter	9%

Third Priority Needs	% of Votes
Economic Opportunity	36.3%
Public Infrastructure	27.3%
Homelessness Prevention	18.2%
Homeownership	18.2%
Affordable Rental Housing	0%
Emergency Shelter	0%

Weighted Overall Ranking	% of Votes
Homelessness Prevention	29%
Homeownership	26%
Public Infrastructure	24%
Affordable Rental Housing	9%
Economic Development	9%
Emergency Shelter	3%



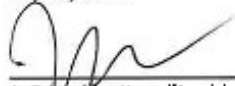
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AFFIDAVIT OF PUBLICATION

State of Oregon, County of Multnomah,
 Cackamas, ss I, J. Brian Monahan, being
 first duly sworn, depose and say that I am
 the President of the **Gresham Outlook**, a
 newspaper of general circulation, published
 in Multnomah County, Oregon, as defined by
 ORS 193.010 and 193.020, that:

Owner: City of Gresham-
Description: Notice of Public Meeting and
Public Comment
Ad#: 284240

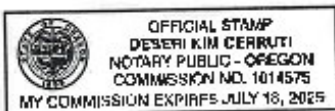
A copy of which is hereto annexed, was
 published in the on-line issue of said
 newspaper for 1 week(s) in the
 following issue(s):
04/07/2023


 J. Brian Monahan (President)

Subscribed and sworn to before me this
 04/07/2023.


 NOTARY PUBLIC FOR OREGON

Acct #: 100882
Attn: Rachel Nehse
 GRESHAM, CITY OF - COMMUNITY DEVELOPMENT
 1333 NW EASTMAN PKWY
 GRESHAM, OR 97030



NOTICE OF PUBLIC MEETINGS
and PUBLIC COMMENT
Five-Year Consolidated Plan FY 2021-2025
One-Year Action Plan FY 2023-2024

The City of Portland, City of Gresham and Multnomah County ("the Consortium") seek comments on the One-Year Annual Action Plan FY 2023-24. The drafts will be available at: www.portlandonline.com/phh/canplan (City of Portland) www.greshamoregon.gov/Community-Revitalization (City of Gresham) www.multco.us/cdbg (Multnomah County)

Physical copies will be available upon request.

A draft of the Gresham Annual Action Plan 2023-24 will be available for review and public comment on Friday, April 7, 2023. The 30-day comment period starts April 7, 2023 and ends May 8, 2023. City of Portland and Multnomah County comment periods are to be determined.

The Consortium will hold public hearings to receive testimony from citizens. Citizens' views received at the hearings will be considered as the One-Year 2023-2024 Action Plans are finalized.

Comments on the Annual Action Plans 2023-24 may be made by e-mailing:
 City of Portland: Uma.Krishnan@PortlandOregon.gov
 City of Gresham: Rachel.Nehse@GreshamOregon.gov
 Multnomah County: Fanny.Rodriguez@MultCo.us

Comment cards for the Five-Year Consolidated Plan 2021-2025 are available at: www.greshamoregon.gov/Community-Revitalization

To hear your public officials' decisions and provide comments, attend the decision meetings listed below. Meetings are open to all members of the public.

Meeting times, website registration and phone information are provided below:

- 1 **City of Gresham Hearing**
- 2 Community Development & Housing Subcommittee
- 3 Date/Time: Wednesday, May 3rd, 2023, 5:30 P.M.
- 4 This meeting can be attended in person or remotely.
- 5 Location: Gresham City Hall, 1st Floor, Oregon Trail Conference Room, 1333 NW Eastman Parkway, Gresham, OR 97030
- 6 Off-street parking available. Blue Max Line- Gresham City Hall stop.
- 7 Remote Registration: <https://tinyurl.com/GreshamAAP23>

- 8 **Multnomah County Hearing**
- 9 CDBG Policy Advisory Board
- 10 Date/Time: Thursday, April 27, 2023, 1:00 PM
- 11 Location: 24200 NE Halsey Street, Wood Village, OR 97060 (Dirks Conference Room)
- 12 To Attend Online: meet.google.com/ijx-cfsn-qfy
- 13 For more information, contact Rachel Nehse at Gresham City Hall, 1333 NW Eastman Parkway, Gresham.

Published 04/07/23



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EXHIBIT A

NOTICE OF PUBLIC MEETINGS and PUBLIC COMMENT Five-Year Consolidated Plan FY 2021-2025 One-Year Action Plan FY 2023-2024

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Multnomah County: Fanny.Rodriguez@MultCo.us

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On-street parking available. Blue Max Line- Gresham City Hall stop.
Remote Registration: <https://tinyurl.com/GreshamAAP23>

Multnomah County Hearing
CDBG Policy Advisory Board
Date/Time: Thursday, April 27, 2023, 1:00 P.M.
Location: 24200 NE Halsey Street, Wood Villages, OR 97060 (Dixie Conference Room)
To Attend Online: meet.google.com/tjx-cfsn-qfy
Phone Access: 208-820-4784 (PIN: 879 885 9411#)

Jurisdictional Decision meetings on Five-Year Consolidated Plan and One-Year Action Plans

City of Gresham Council
Date/Time: Tuesday, June 6, 2023, 6:00 PM
This meeting may be attended in person or remotely.
Location: City of Gresham Council Chambers, 1333 NW Eastman Parkway, Gresham, OR 97030

EXHIBIT A

1000000, City of Gresham Council Chambers, 1333 NW Eastman Parkway, Gresham, OR 97030

On-street parking available. Blue Max Line- Gresham City Hall stop.

Remote Access: To register to attend remotely call 503-618-2691 or contact Rachel.Gangelhoff@GreshamOregon.gov 24-hours before the meeting to allow the testimony to be forwarded to the City Council.

Note: At this time, the Annual Action Plan Hearing and the City Council Hearing for City of Portland is still in the process of being finalized. A notice will be published when the hearing dates are finalized.

Accessibility & Language Services: To help ensure equal access to government programs, services, and activities, the meeting host jurisdiction will reasonably modify policies/procedures and provide auxiliary aids/services to persons with disabilities, will reasonably provide translation services. Translation services and sign language interpretation are available with 3 days notice. For additional information contact Rachel Kelle, (503) 618-2814, at Gresham City Hall, 1333 NW Eastman Parkway, Gresham.

Published 04/07/23



G0264240

Gresham & Multnomah County Written Public Comment Summary

Overview

Con Plan Comment Cards were available online as fillable PDFs and as an online survey from November 1, 2022, through May 9, 2023. These opportunities to comment were advertised in the public notices published in the Gresham Outlook for the Community Needs Hearing on November 16, 2022, and the Gresham Annual Action Plan public hearing on May 3, 2022. Links were also made available online and were sent to the City of Gresham's Community Revitalization contact list.

Respondent Summary

Responses received came from service providers and residents living in Gresham, NE Portland, SE Portland, Unincorporated Multnomah County and outside Multnomah County. Some respondents opted not to answer questions identifying where they reside, so additional comments may be from residents of other neighborhoods not identified on this list. Service providers responding represented 7 different local non-profit organizations.

Comment Summary

Housing

- Many commenters stressed the need for additional housing development, especially for affordable, family sized units. With inflation and increasing rents, many local community members struggle to find and maintain housing. Affordable housing should be high quality and well maintained. Often low-income households have no choice but to live in substandard housing because it's all they can afford.
- Some commenters noted that changes to requirements for developing homes could encourage new construction. For example:
 - Making ADU rules more flexible
 - Simplifying the review process for new construction
- Commenters highlighted the need for housing that meets the needs of specific, vulnerable populations, such as:
 - Housing that includes wrap around services to stabilize households.
 - Transitional housing with pathways into permanent housing for residents.
 - Housing available to those who may not qualify for affordable housing units due to criminal backgrounds, income requirements or other obstacles.
- Education around housing in general, including fair housing and renters' rights is needed.
- Homebuyer programs should provide increased funding so that they make homeownership available to lower income households.
- Programs that keep people safely housed are a high need, including mini rehab programs that provide accessibility improvements or emergency repairs.

Houselessness

- Commenters encouraged a more robust homeless services team with better ability to place unhoused residents directly into housing.
- Shelters in East County need to be supported and maintained. Short term shelters should offer safe and dignified housing, with pathways to permanent housing.

Services

- Commenters noted that high inflation has many households in need of increased services to meet their basic needs such as food assistance and programs that cover housing and utility costs.
- There is an overall need for more youth services in Gresham and East County.
- The pandemic has led to increases in houselessness and crime, which need to be addressed.

Economic Development

- One commenter highlighted the need for small business assistance. Many businesses have been severely impacted by the pandemic due to lost business during lockdowns, increased crime in the area, labor shortages and high inflation. There is an especially high need for assistance to BIPOC and woman owned businesses and there is a service gap for business owners in the 81% to 95% MFI range because they do not qualify for CDBG assistance.
- There is a lack of living wage jobs for residents in East Multnomah County and Gresham. Job training and placement services are a high need, especially for youth.

Infrastructure

- There's a need for more greenspace and parks, especially in the Gateway area.
- One commenter noted the need for green infrastructure improvements to provide better infrastructure while also addressing climate change concerns.
- Street improvements to make roads safer for pedestrians and cars were identified as a need. Examples include pothole repair, sidewalks, and street crossings.

Other

- One commenter stressed the importance of a fair and unbiased subrecipient selection process with proper oversight to ensure that CDBG and HOME funds are being allocated appropriately.



6005 SE 1st Ave., Portland, OR 97222
 PO Box 22109 Portland, OR 97209-2109
 Phone: 503-684-0300 Fax: 503-870-3433
 E-mail: info@commnewspapers.com

AFFIDAVIT OF PUBLICATION

State of Oregon, County of Multnomah, Charlotte Aliso, being first duly sworn, depose and say that I am the Accounting Manager of the **Gresham Outlook**, a newspaper of general circulation published in Multnomah County, Oregon, as defined by ORS 93.010 and 105.020, that

**City of Gresham- Program Analyst
 Public Notice Correction- for Public Notice
 published on Friday April 7th 2023.
 Act#: 290467**

A copy of which is hereto annexed, was published in the entire issue of said newspaper(s) for 1 week(s) in the following issue(s):
06/02/2023


 Charlotte Aliso (Accounting Manager)

Subscribed and sworn to before me this
06/02/2023.


 NOTARY PUBLIC FOR OREGON

Act #: 100682
Attn: Rachel Nehse
 GRESHAM, CITY OF COMMUNITY DEVELOPMENT
 1333 NW EASTMAN PKWY
 GRESHAM, OR 97030



**PUBLIC NOTICE CORRECTION
 Five-Year Consolidated Plan FY 2021-2025
 One-Year Action Plan FY 2023-2024**

The City of Gresham published a public notice on Friday, April 7th, 2023, to announce the public comment period and public hearing dates for the City's One-Year Annual Action Plan FY 2023-24. The City's draft plan is available at: www.greshamoregon.gov/Community-Revitalization

Physical copies are available upon request.

A draft of the Gresham Annual Action Plan 2023-24 was made available for review and public comment beginning Friday, April 7, 2023. The 30-day comment period started April 7, 2023, and ended May 8, 2023. A City of Gresham Hearing was held with the Community Development & Housing Subcommittee on Wednesday, May 3rd, 2023, at 5:30 P.M.

This notice does not alter the original 30-day comment period or the City of Gresham Hearing with the Community Development & Housing Subcommittee.

The City of Gresham Council meeting published in the original notice on April 7, 2023, has been changed. The updated meeting time, website registration and phone information are provided below:

City of Gresham Council
Date/Time: Tuesday, June 20, 2023, 6:00 PM
 This meeting may be attended in person or remotely.
Location: City of Gresham Council Chambers, 1333 NW Eastman Parkway, Gresham, OR 97030
 Off-street parking available. Blue Max Line- Gresham City Hall stop.
Remote Access: To register to attend remotely call 503-618-2697 or contact Rachael.Gangelhoff@GreshamOregon.gov 74 hours before the meeting to allow the technology to be forwarded to the City Council.

Accessibility & Language Services: To help ensure equal access to government programs, services, and activities, the meeting host jurisdiction will reasonably modify policies/procedures and provide auxiliary aids/services to persons with disabilities, will reasonably provide translation services. Translation services and sign language interpretation are available with 3 days' notice. For additional information contact Rachel Nehse, (503) 618-2814, at Gresham City Hall, 1333 NW Eastman Parkway, Gresham.

Published 06/02/23



GO290467

Gresham City Council Public Comment Summary
June 20th, 2023

Comments Received: 5 (2 subrecipient staff members, 3 community members/clients of subrecipients)

Comment Summary: The City received one written comment and four in-person comments at the Gresham City Council hearing for the CDBG and HOME Action Plan budgets. Comments expressed support for the proposed budgets and expressed how important programs that stabilize households are. Comments expressed support for the Willow Tree, Living Solutions and Proud Ground projects, all of which will be funded in 2023-24.

Note: This hearing was originally scheduled for June 6, 2023. The meeting was moved due to time limitations at the June 6th meeting. A correction notice was published to notify the public of the updated meeting time.

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: B-23-MC-41-0006	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Gresham		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 93-6002176	* c. UEI: MZJBMXJT2SK6	
d. Address:		
* Street1: 1333 NW Eastman Parkway	Street2: <input type="text"/>	
* City: Gresham	County/Parish: <input type="text"/>	
* State: OR: Oregon	Province: <input type="text"/>	
* Country: USA: UNITED STATES	* Zip / Postal Code: 97030-7303	
e. Organizational Unit:		
Department Name: Community & Economic Developme	Division Name: Housing Services	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: Rachel	
Middle Name: <input type="text"/>	* Last Name: Nehse	
Suffix: <input type="text"/>	Title: Program Analyst	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 503-618-2814	Fax Number: <input type="text"/>	
* Email: rachel.nehse@GreshamOregon.gov		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="C: City or Township Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.210"/> <p>CFDA Title:</p> <input type="text" value="Community Development Block Grant"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text"/> <p>* Title:</p> <input type="text"/>	
<p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="2023-24 Gresham CDBG Annual Action Plan"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	OR-003
* b. Program/Project	OR-003
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	07/01/2023
* b. End Date:	06/30/2024
18. Estimated Funding (\$):	
* a. Federal	1,040,018.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	350,856.00
* f. Program Income	
* g. TOTAL	1,390,874.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties, (U.S. Code, Title 18, Section 1001)	
<input type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix:	<input type="text"/>
* First Name:	Nina
Middle Name:	<input type="text"/>
* Last Name:	Vetter
Suffix:	<input type="text"/>
* Title:	City Manager
* Telephone Number:	503-618-2346
Fax Number:	<input type="text"/>
* Email:	Nina.Vetter@GreshamOregon.gov
* Signature of Authorized Representative:	<div style="border: 1px solid black; padding: 5px; display: inline-block;"> Nina Vetter Digitally signed by Nina Vetter Date: 2023.06.23 08:31:04 -07'00' </div>
* Date Signed:	06/23/23

APPROVED AS TO FORM

Nina Vetter
 City Attorney's Office

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the [Intergovernmental] Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Nina Vetter Digitally signed by Nina Vetter Date: 2023.06.23 08:29:03 -07'00'	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Gresham	06/23/23

SF-424D (Rev. 7-97) Back

APPROVED AS TO FORM

Nina Vetter

City Attorney's Office

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives,
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  Digitally signed by Nina Vetter Date: 2023.06.23 08:31:29 -07'00'	TITLE City Manager
APPLICANT ORGANIZATION City of Gresham	DATE SUBMITTED 06/23/23

Standard Form 424B (Rev. 7-87) Back

APPROVED AS TO FORM

 City Attorney's Office

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal loan, the making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Digitally signed by Nina Vetter
Date: 2023.06.23 08:30:58 -0700
Nina Vetter


 Signature of Authorized Official

06/23/23

 Date

City Manager

 Title

Approved as to Form


City Attorney's Office

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2023-24 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Nina Vetter
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Date: 2023.06.23 16:32:22 -0700

06/23/23

Signature of Authorized Official

Date

City Manager

Title

Approved as to Form

Miriam Alvarado
City Attorney's Office

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Nina Vetter
Digitally signed by Nina Vetter
Date: 2023.06.23 16:32:34 -07'00'

Signature of Authorized Official

06/23/23
Date

City Manager

Title

Approved as to Form
Maura DeWitt

City Attorney's Office

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

