

State of Oregon

Public Action Plan for Community Development Block Grant Disaster Recovery (CDBG-DR)

In Response to the 2020 Labor Day Fires and Straight-line Winds

Action Plan Approved by HUD September 30, 2022

Action Plan Amendment #2 (Substantial)



Got Questions?

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Action Plan



Amendment #2

– Substantial

1 Action Plan Amendment #2 – Substantial

This document constitutes the second amendment to the State of Oregon CDBG-DR Public Action Plan.

The purpose of this Action Plan Amendment (APA) Number 2 to Oregon's Public Action Plan (Approved by HUD September 30, 2022) is to make amendments that meet one of the following Substantial APA criteria:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- The allocation or reallocation of the greater of either a re-allocation of \$5 million or a reallocation that constitutes a change of 15% or greater of a program budget

1.1 Summary of Changes

1.1.1 Overview

Throughout the past year, Oregon Housing and Community Services (OHCS) launched its pillar programs — the Homeowner Assistance and Reconstruction Program (HARP) and the Planning, Infrastructure, and Economic Revitalization (PIER) program. Additionally, in anticipation of launching more programs, Oregon has focused engagement efforts with survivors, subrecipients, community-based organizations, and local governments. OHCS has gathered input from its partners, revised its housing market analysis, and reassessed its strategies to address housing unmet needs. Subsequently, the Substantial Amendment includes (1) a redistribution and redesign of housing program offerings and their allocations, (2) refined program pathways and award caps in HARP, and (3) reallocations to ensure the effective delivery of key programs. An update on the unmet needs assessment is provided ahead of the housing program updates with references to data in the data sources section of the plan.

1.1.2 Summary of Amendments to the Action Plan

1.1.2.1 Homeowner Assistance and Reconstruction Program

Program Pathways and Updated Award Caps

This section has been reorganized to clearly detail the program pathways as Reconstruction, Rehabilitation, Manufactured Home Replacement, and Home Purchase,

with reference to ReOregon-managed projects versus homeowner-managed projects. The award caps were updated based on new market analysis numbers while accounting for regional and home purchase multipliers. The specific award amount is capped based on the type of unit (e.g., double-wide or single-wide, size of damaged unit, number of bedrooms, etc.) for which the applicant is eligible, which will be based on the household size or the comparable size of the damaged home and damaged property type (leased land versus owned land). Award caps vary based on the program pathway. The Connection to Unmet Needs section of Housing, Program Details has been updated to reflect post-launch learnings. Additionally, data references on the award multipliers are included in the Data Sources and Methodologies section.

Reimbursement

HARP will now also offer a pathway for reimbursement to support eligible reconstruction and replacement recovery costs. The award cap is \$100,000 based on eligible expenses.

ADU Pilot

The option for Accessory Dwelling Units (ADU) has been moved to the Affordable Housing Development (AHD) program for the purpose of increasing affordable rentals.

Homeownership assistance details were framed as a stand-alone pathway for HARP.

Eligibility

Eligible structures are now clearly defined for both the damaged or replacement property as single-family residences, manufactured homes, and prefabricated homes. For reimbursement awards specifically, the program may allow for additional eligible structures such as replacement homes in multifamily units.

Eligible activities have been updated to include reimbursement, homeownership assistance, rental assistance and relocation, and legal services.

Supplemental Awards

Additional supplemental awards have been clearly organized to include optional relocation for homeowners displaced due to construction or replacement activities, rental assistance to support homeowners who need to secure pad sites during the replacement period, and flood insurance support.

Reallocation of Funds

A total of \$39 million will be redistributed from HARP to support the redesign of housing programs and activity delivery needs.

1.1.2.2 Homeownership Opportunities Program Conversion Into Housing Support Services and Affordable Housing Development

The former Homeownership Opportunities Program (HOP), originally designed with two pathways — AHD and Down Payment Assistance (DPA) — will now be redesigned into two separate programs.

AHD will be redesigned as a stand-alone program. It will be funded by redistributing a portion of the HOP allocation. An additional \$30 million will be reallocated from HARP to support county efforts in the development of affordable housing.

A new program, Housing Support Services, will be inclusive of three pathways, DPA, Intermediate Housing Assistance (IHA), and Housing Counseling Services. This program will combine funding allocations for IHA, the remainder of HOP funding, and \$5.5 million from HARP allocations.

1.1.2.3 Affordable Housing Development

County Managed Program

This program will allocate funds to counties to pursue projects to increase affordable housing. Examples of possible projects that counties may pursue include the construction of multifamily housing and multifamily rental units, rehabilitation of existing housing stock, or addition of infrastructure that is necessary to increase housing.

Oregon will no longer manage the construction process. Instead, counties will receive allocations and manage self-select programs.

Eligible Activities

Eligible activities have been expanded to include infrastructure that leads to affordable housing, acquisition that ends in affordable housing for homeownership or rental, demolition and clearance that allows for affordable housing construction, rehabilitation or reconstruction of units for rental or homeownership, single-family or multifamily new construction for rental or homeownership including site-built or prefabricated (manufactured) homes, and ADUs.

National Objective

There will be no application phasing. However, an explanation of the prioritization of low- to moderate-income (LMI) applicants within projects will be required, with 85% of the allocation expected to meet an LMI national objective.

Community Development Block Grant Disaster Recovery Construction Requirements

Counties will have to meet the standards required by Community Development Block Grant Disaster Recovery (CDBG-DR). These include energy efficiency and levels of accessibility required by CDBG-DR but with added visitability efforts.

1.1.2.4 Housing Support Services

Housing Support Services will offer fire-impacted and LMI households a single point of entry to access multiple pathways to achieve housing recovery. Applicants will be able to submit one application and be considered for IHA, Housing Counseling Services, and DPA, all intended to help households meet their housing goals for long-term stability.

Intermediate Housing Assistance

This program was moved from Public Services and integrated into a program pathway under Housing Support Services.

Down Payment Assistance

To be eligible, applicants must purchase within the eight counties, or “impacted county.” They do not need to purchase in the damaged site county or their current county.

The maximum front-end ratio or housing-to-income ratio will be set at 30%.

The maximum award will either be \$150,000 or 70% of the price.

There will be a 30-year affordability period and then forgiveness will be one-thirtieth every year.

Housing Counseling Services

As part of Oregon’s efforts to reduce or eliminate barriers to homeownership for LMI households and others facing housing instability following the 2020 Labor Day wildfires and straight-line winds, Housing Counseling Services will be provided by the U.S. Department of Housing and Urban Development (HUD) certified housing counselors to help households on their path to housing recovery and long-term stability.

1.1.2.5 Planning, Infrastructure, and Economic Revitalization Reallocation

A total of \$3.5 million will be reallocated from HARP to the PIER program to cover state activity delivery to ensure that the previous allocation could be fully provided to the counties.

1.1.2.6 Federal Flood Risk Management Standard

In alignment with the recently mandated Federal Flood Risk Management Standard (FFRMS), the Elevation Standards section has been updated. The FFRMS creates a shift in the federally recognized floodplain as it expands from the 100-year floodplain to the new “FFRMS floodplain.” The new FFRMS revises floodplain management regulations in 24 CFR Part 55 and offers changes to minimum property standards in 24 CFR Part 200. The effective date of the new FFRMS was May 23, 2024, with a compliance date of June 24, 2024.

1.1.2.7 Resilience Planning Program

The original Action Plan identified the program that would conduct regional and statewide planning efforts. In alignment with this intent, the geographic eligibility and its connection to disaster and unmet needs were updated to ensure the development of a comprehensive and holistic statewide plan.

1.1.2.8 Public Engagement, Hearings, and Public Comments

The plan includes updated public participation actions, public comments, and subsequent responses, as well as updated website details.



Executive Summary

2 Executive Summary

2.1 Overview

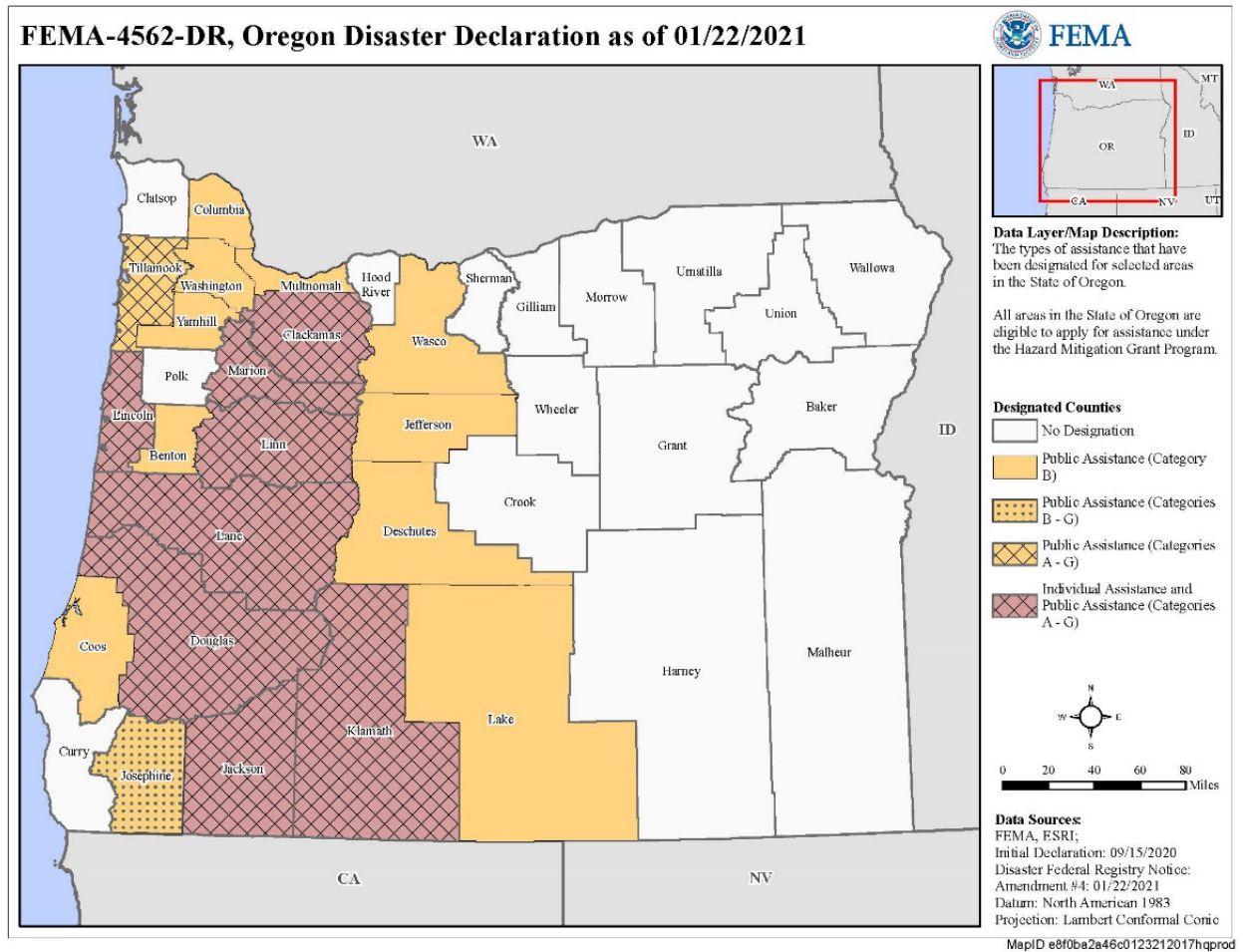
The U.S. Department of Housing and Urban Development (HUD) announced that the State of Oregon (State or grantee) will receive \$422,286,000 in funding to support long-term recovery and mitigation efforts following the 2020 Wildfires (DR-4562) through the Oregon Housing and Community Services Department (OHCS). Community Development Block Grant – Disaster Recovery (CDBG-DR) funding is designed to address the needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet needs in Oregon.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$422,286,000 in CDBG-DR funds to the State of Oregon in response to 2020 Wildfires (DR-4562) through publication in the Federal Register, [Vol. 87, No. 23, February 3, 2022 \(87 FR 6364\)](#). This allocation was made available through the Disaster Relief Supplemental Appropriations Act of 2022 (Pub. L. 117-43), approved on September 30, 2021 (the Appropriations Act).

2.2 Disaster-Specific Overview

A disaster was presidentially declared on September 15, 2020, although the 2020 Wildfires engulfed large parts of Oregon beginning September 7, 2020, through the main containment date of November 3, 2020. In total, 20 out of Oregon's 36 counties were included in the disaster declaration under DR-4562 Oregon Wildfires and Straight-line Winds. These counties were eligible for different Federal Emergency Management Agency (FEMA) programs based on the impacts of the disaster, as demonstrated in Figure 1.

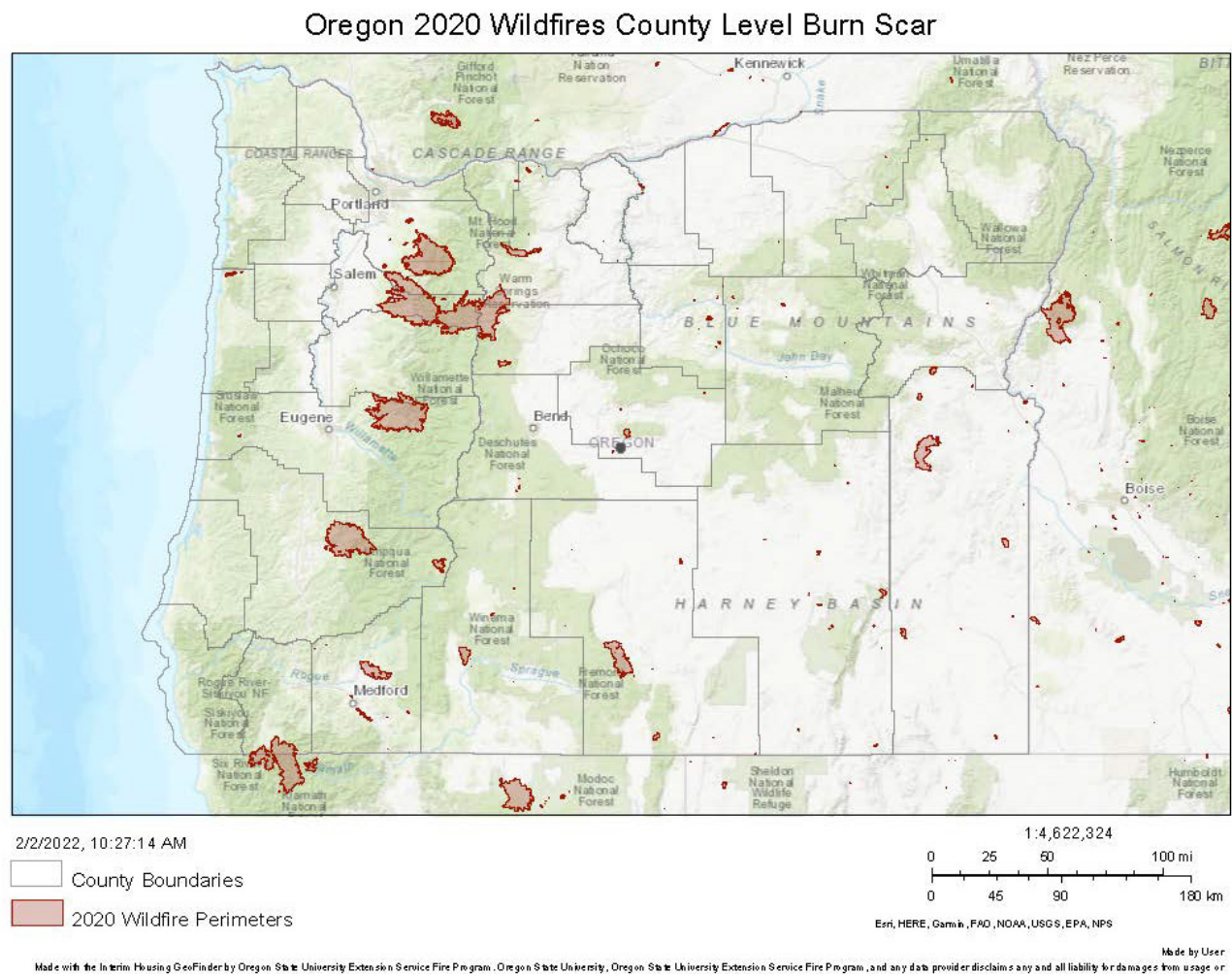
Figure 1: FEMA DR-4562 Oregon Wildfires and Straight-line Winds Presidentially Declared Disasters, by County



In total, the DR-4562 event included 21 fires and burned more than 1.2 million acres. Five of the fires grew into megafires, defined as fires that burn areas larger than 100,000 acres. Oregon had never experienced more than one fire over 100,000 acres during a fire season in the State's recorded history. All major fires were contained by early December 2020.

Figure 2 provides a map of the burn scar areas from the 2020 Wildfires that occurred through November 2020.

Figure 2: 2020 Wildfires: Map of Burn Scar Areas



The largest and most destructive of the 2020 fires included the following:

- The Archie Creek fire in Douglas County burned more than 131,000 acres and destroyed more than 100 homes between September 7, 2020, and a containment date of November 16, 2020.
- The Holiday Farm fire in Lane and Linn counties burned more than 170,000 acres and destroyed more than 700 structures between the start date on September 7, 2020, and a containment date on November 23, 2020.
- The Beachie Creek and Lionshead fires started as separate fires on August 16, 2020, and merged in Clackamas, Linn, and Marion counties on September 8, 2020. The two fires combined to burn nearly 400,000 acres and more than 1,000 structures.
- The Riverside fire in Clackamas County that burned from September 8 to December 3, 2020, destroyed more than 100 structures.
- The Alameda Fire in Jackson County lasted just 6 days, from September 8 to September 14, 2020, and burned around 3,000 acres. Despite the relatively small size and short duration, the fire destroyed 2,500 homes.

Overall, more than 40,000 residents had to evacuate and more than 500,000 were placed on an evacuation notice. More than 4,300 homes were damaged or destroyed. Of the 4,300 homes burned, nearly half were manufactured homes.

In addition to the fires' and winds' impacts on homes and residents, they damaged roads, streetlights, irrigation systems, electrical lines, water delivery systems, and other public infrastructure. Indeed, at least 923 nonresidential buildings across seven counties were damaged or destroyed. Nine State highways and two interstate highways were forced to close due to fire hazards and many remained closed for extended periods of time due to damage. In Lane County alone, a reported 246,000 consumers were without power, either from public safety power shutoffs or damage to utility infrastructure, and more than 40 miles of electrical infrastructure required complete replacement. In addition, a communications tower on Mt. Hagen was destroyed, resulting in several citizens not receiving evacuation notices, while damage to the Blue River Water District delivery system resulted in the loss of potable water service to roughly 400 people.

The 2020 wildfires exacerbated an existing housing crisis in Oregon by damaging or destroying more than 4,300 homes — nearly half of which were manufactured homes.

Fire stations in McKenzie Bridge, White City, and Phoenix were damaged or destroyed by fire. Several towns in Jackson County, including Phoenix and Talent, suffered significant damage to roads, street signs, and guardrails, and the county lost several vehicles, outbuildings, tools, and equipment. Among the hardest hit towns, Phoenix suffered damages involving every category of work, including those to police patrol units, public buildings, waterlines, playgrounds, benches, picnic tables, and park restrooms, and the Southern Oregon Education Service District lost its entire 35,000-square foot campus.

The fires also left behind more than 90,000 hazardous burned trees, as well as ash and debris, which needed to be removed to allow for reconstruction, with many such trees threatening public safety or impeding roads. All told, preliminary damage assessments conducted as part of the FEMA Public Assistance Program estimate more than \$114 million in permanent work across categories C through G. Information for this section was extracted from the following sources:

- [2020 Oregon Wildfire Spotlight](#)
- [Oregon Office of Emergency Management Wildfire Dashboard](#)
- [Oregon Wildfire Response and Recovery](#)

2.3 Summary

2.3.1 Needs Assessments and Guiding Principles

To develop the CDBG-DR Public Action Plan, OHCS engaged State and federal agencies, local governments, nonprofit organizations, housing-specific workgroups, the Housing Stability Council, public housing authorities, tribal governments, community-based organizations, community action agencies, long-term recovery groups, and other ad hoc work groups focused on recovery. Engagement with these organizations started in September 2020, in the middle of the wildfires, through the National Disaster Recovery Framework led by FEMA, the Office of Emergency Management, and other federal and State agencies; the State's Disaster Housing Task Force; and other response and recovery support functions, committees, and workgroups. OHCS and HUD also collected information and feedback through surveys and local engagement associated with the development of

Community engagement should create opportunities for communities and populations that have typically been denied access and representation in the decision-making process to provide input to increase racial equity outcomes. Ongoing public engagement will help ensure program policies and procedures are accessible for households that may face greater barriers to recovery.

the State's Housing Impact Assessment and the State's Disaster Housing Recovery Action Plan. OHCS expanded this engagement by presenting the preliminary unmet needs assessment to state agencies, Tribal and local governments, wildfire recovery work groups, community-based organizations and the State's Housing Stability Council after the announcement of the CDBG-DR appropriation in September 2021 through April 2022. The State then held its public comment period from May 2, 2022 through June 1, 2022, with records made available to the public. This CDBG-DR Action Plan includes an unmet and mitigation needs analysis, as well as recovery and mitigation programming, which reflect the best available data at the time of publication.

OHCS understands that the data collected may not comprehensively represent the entire impact and full spectrum of need across the HUD-identified most impacted and distressed (MID) and other presidentially declared disaster areas. Therefore, public and stakeholder engagement remains ongoing as program policies and procedures are drafted and implemented to ensure that CDBG-DR programs are accessible to and benefit households and individuals who have not yet been included in the needs assessment and who may be marginalized from accessing resources.

Part of racial equity analysis requires an investigation of the root causes for inequitable outcomes seen in programs. If we hope to bring about substantial constructive change, we need to develop the habit and the capacity to think systematically in order to better understand how systems can create inequities. As program designers, it is our duty to disrupt these systems.

For the development of the CDBG-DR Action Plan and its CDBG-DR programs, OHCS drew on the agency mission and vision; the goals and principles included in OHCS's Statewide Housing Plan, the Oregon Disaster Housing Task Force's Housing Recovery Action Plan, and the final report of the Governor's Wildfire Economic Recovery Council; feedback from the Housing Stability Council, local governments, and community-based organizations; and HUD's published guidance. Drawing on all of these sources, OHCS has determined that advancing equity and resilience are the two primary pillars and guiding principles for Oregon's CDBG-DR program development.

Based on the assessment made at the time of the publication of the Action Plan, the 2020 Wildfires and winds severely damaged or destroyed more than 4,300 housing units across eight counties and burned more than 1.2 million acres across 20 out of Oregon's 36 counties, leaving behind a trail of devastated homes, public infrastructure, forests, watersheds, and businesses. Based on the Unmet Needs Assessment, the State has calculated a total of nearly \$1.9 billion in housing, infrastructure, economic revitalization, and mitigation recovery needs. This estimate is incomplete. For instance, per HUD-guidance the State drew on Small Business Administration (SBA) datasets to understand the losses experienced by businesses, but only 136 of hundreds of impacted businesses applied for SBA assistance. The State continues to work with local governments to calculate a more accurate value of unmet infrastructure and economic revitalization needs. This number includes an alternate methodology for calculating the housing recovery need, which is reflected in the Data and Methodology section of this Action Plan. At the time of the assessment, the State has identified under \$1.5 billion in other federal, State, and private insurance resources available to meet the recovery needs of the State, leaving a total projected unmet need of over \$440 million. This estimate also includes over \$1 billion in private insurance proceeds, which includes an unknown amount of insurance provided for personal contents, vehicles, and other activities that were not included in the needs calculation. Therefore, this estimate is projected to be conservative in estimating the actual costs for long-term recovery from the 2020 Wildfires.

The State of Oregon is committed to equity and resilience as pillars of recovery and will incorporate these guiding principles into each of its CDBG-DR programs:

- Advancing equity and racial justice and supporting underserved communities.
- Rebuilding homes and communities so that they are more resilient to current and projected hazards.

2.3.2 CDBG-DR Budget

The Federal Register Allocation Announcement and Consolidated Notices (Notices) require HUD grantees to assess and describe how it will address the unmet needs associated with the rehabilitation, reconstruction, and new construction of affordable housing and housing for vulnerable populations and underserved communities, infrastructure, economic revitalization, and mitigation.

The Federal Register Notice also requires grantees to demonstrate a reasonably proportionate allocation of resources relative to areas and categories (i.e., housing, economic revitalization, and infrastructure) of greatest needs identified in the impact and unmet needs assessment or provide an acceptable justification for a disproportionate allocation.

The Notices also include the following expenditure requirements, which are reflected in Table 1:

- **Program Administration Costs:** Limited to 5%—or \$21,114,300—of the total allocation.
- **Mitigation Activities:** At least 15%—or \$55,081,000—must be used for mitigation activities and/or through the incorporation of mitigation measures into recovery activities. The State plans on incorporating resilience and mitigation measures into all construction and planning programs.

The State will define mitigation activities and establish mitigation measures within each program. Table 1 below includes an estimate of the percentage of total program costs that will be considered “mitigation activities.” The mitigation estimates for the housing activities are high because the State anticipates reconstructing homes to be more resilient to future hazards in their respective areas.

- **HUD-Identified Most Impacted and Distressed (MID) Areas:** At least 80%—or \$337,828,800—of the total allocation must benefit the HUD-identified areas. This includes 80% of expenditures for program administration.
- **Benefit to Low- to Moderate-Income (LMI) Persons:** At least 70%—or \$280,820,190—of the allocation (less planning and administration costs) must be used for activities that benefit LMI persons.

The table below summarizes how the State estimates it will meet or exceed HUD’s expenditure requirements. Actual expenditures will be tracked and reported publicly on the CDBG-DR website. Descriptions of how these funding decisions reflect the Unmet and Mitigation Needs Assessments and the State’s guiding principles are included within each of the program descriptions further below in the Action Plan.

As required by HUD, OHCS will design programs to be inclusive and help reduce barriers for vulnerable populations and underserved communities.

“Vulnerable populations” are defined by HUD as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources.

The term “underserved communities” refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life.

Table 1: Oregon's CDBG-DR Program Allocation

Program	\$ Allocation	% of Total Allocation	Est. % to Mitigation Activities	Est. % to HUD Defined MID areas	Est. % to LMI
Housing	\$344,019,379	81.5%	76%	99%	85%
Homeowner Assistance and Reconstruction Program	\$204,597,567	48.5%	80%	99%	85%
Homeownership Opportunities Program	\$119,348,581	28.3%	80%	99%	85%
Intermediate Housing Assistance	\$20,073,231	4.8%	0%	99%	85%
Multi-Sector	\$42,117,170	10.0%	100%	99%	25%
Planning, Infrastructure Economic Revitalization Program	\$42,117,170	10.0%	100%	99%	25%
Public Services	\$12,035,151	2.9%	0%	99%	95%
Housing and Recovery Services	\$6,017,576	1.4%	0%	99%	95%
Legal Services	\$6,017,575	1.4%	0%	99%	95%
Planning	\$3,000,000	0.7%	100%	99%	N/A
Resilience Planning Program	\$3,000,000	0.7%	100%	99%	N/A
Administration	\$21,114,300	5%	N/A	99%	N/A
Total	\$422,286,000				
% of Total	100%	100%	77%	99%	79%

2.3.3 Action Plan Amendment #2 — Substantial

Throughout the past year, OHCS launched its pillar programs, HARP and PIER. Additionally, in anticipation of launching more programs, the state has focused on engagement efforts with survivors, subrecipients, community-based organizations, and local governments. Subsequently, the Substantial Amendment incorporates CDBG-DR budget changes that

include (1) a redistribution and redesign of housing program offerings and their allocations and (2) reallocations to ensure the effective delivery of key programs.

- The former HOP, originally designed with two pathways — AHD and DPA — will now be redesigned into two separate programs.
- AHD will be redesigned as a stand-alone program. It will be funded by redistributing a portion of the HOP allocation.
 - This program will allocate funds to counties to pursue projects to increase affordable housing. Examples of possible projects include the construction of a manufactured housing park or subdivision for homeownership or multifamily rental, rehabilitation of existing housing stock to be resold or rented, or addition of infrastructure that is necessary to increase housing.
 - An additional \$30 million will be reallocated from HARP to support county efforts in the development of affordable housing.
- A new program, Housing Support Services, will be inclusive of three pathways: DPA, IHA, and Housing Counseling Services. This program will combine funding allocations for IHA, the remainder of HOP funding, and a \$5.5 million reallocation from HARP.
- A total of \$3.5 million will be reallocated from HARP to the PIER program to cover state activity delivery.
- Based on the changes noted above, \$39 million will be redistributed from HARP to support the redesign of housing programs and activity delivery needs.
 - Additionally, the 1% estimated for state-defined most impacted and distressed (MID) areas was removed, and HARP is now estimated to be 100% allocated to HUD-defined MIDs.
- The mitigation activities estimated percentage by program have been updated following the launch of HARP and the PIER program. The total estimated percentage for mitigation activities remains much higher than the required amount for CDBG-DR.
 - HARP is expected to have a lower percentage to account for reimbursement awards.
 - The proposed PIER projects are primarily geared toward recovery efforts within county communities.

Table 2: Oregon's CDBG-DR Program Allocation — Amendment #2

Program	\$ Allocation	% of Total Allocation	Est. % to Mitigation Activities	Est. % to HUD Defined MID areas	Est. % to LMI
Housing	\$340,519,379	80.6%	28%	99%	85%
HARP	\$165,597,567	39.2%	50%	100%	85%
HOP	\$0.00	0.0%	0%	0%	0%
IHA	\$0.00	0.0%	0%	0%	0%
AHD	\$127,348,581	30.2%	10%	99%	85%
Housing Support Services (IHA, DPA, HCS)	\$47,573,231	11.3%	0%	99%	85%
Multi-Sector	\$45,617,170	10.8%	8%	99%	25%
PIER	\$45,617,170	10.8%	8%	99%	25%
Public Services	\$12,035,151	2.9%	0%	99%	95%
Housing and Recovery Services	\$6,017,576	1.4%	0%	99%	95%
Legal Services	\$6,017,575	1.4%	0%	99%	95%
Planning	\$3,000,000	0.7%	100%	99%	N/A
Resilience Planning Program	\$3,000,000	0.7%	100%	99%	N/A
Administration	\$21,114,300	5%	N/A	99%	N/A
Total	\$422,286,000				
% of Total	100%	100%	77%	99%	79%

Table 3: Redistribution of Funds for Substantial Amendment #2

Program	\$ Allocation	\$ Allocation	% of Total Allocation
Housing	-\$3,500,000	\$340,519,379	80.6%
HARP	-\$39,000,000	\$165,597,567	39.2%
HOP	-\$119,348,581	\$0.00	0.0%
IHA	-\$20,073,231	\$0.00	0.0%
AHD	\$127,348,581	\$127,348,581	30.2%
Housing Support Services (IHA, DPA, HC)	\$47,573,231	\$47,573,231	11.3%
Multi-Sector	\$3,500,000	\$45,617,170	10.8%
PIER	\$3,500,000	\$45,617,170	10.8%
Public Services	\$0.00	\$12,035,151	2.9%
Housing and Recovery Services	\$0.00	\$6,017,576	1.4%
Legal Services	\$0.00	\$6,017,575	1.4%
Planning	\$0.00	\$3,000,000	0.7%
Resilience Planning Program	\$0.00	\$3,000,000	0.7%
Administration	\$0.00	\$21,114,300	5%
Total	\$0.00	\$422,286,000	
% of Total		100%	100%

2.4 Unmet Needs and Proposed Allocations

Table 4: Unmet Needs and Proposed Allocations

Category	Remaining Unmet Needs	% of Unmet Needs	Program Allocation Amounts*	% of Program Allocation
Housing	\$242,758,000	55%	\$344,019,379	81.50%
Infrastructure	\$171,300,000	38%	\$42,117,170	10.00%
Economic Revitalization	\$29,974,000	7%	\$0	0%
Public Services	N/A	N/A	\$12,035,151	2.90%
Planning	N/A	N/A	\$3,000,000	0.70%
Administrative Costs	N/A	N/A	\$21,114,300	5.00%
Total	\$444,032,000	100%	\$422,286,000	100%

* Program allocation amounts include project delivery costs.

2.4.1 Action Plan Amendment #2 — Substantial

For the proposed reallocations in the Substantial Amendment, most of the fund movement involves redistributing within the housing allocation to address the remaining unmet needs identified. A small change of 0.09%, or \$3.5 million, was reallocated from the housing category to support service delivery in infrastructure and economic revitalization, ensuring that the original allocation is fully provided to local governments and their projects. Table 5 also includes updates to reference the proposed economic revitalization projects by counties within the PIER program to address the unmet needs.

Table 5: Unmet Needs and Proposed Allocations — Amendment #2

Category	Remaining Unmet Needs	% of Unmet Needs	Program Allocation Amounts*	% of Program Allocation
Housing	\$242,758,000	55%	\$340,519,379	80.60%
Infrastructure	\$171,300,000	38%	\$42,348,727	10.02%
Economic Revitalization	\$29,974,000	7%	\$3,268,443	0.77%
Public Services	N/A	N/A	\$12,035,151	2.90%
Planning	N/A	N/A	\$3,000,000	0.70%
Administrative Costs	N/A	N/A	\$21,114,300	5.00%
Total	\$444,032,000	100%	\$422,286,000	100%

* Program allocation amounts include project delivery costs.



Unmet Needs Assessment

3 Unmet Needs Assessment

3.1 Overview

This section follows U.S. Department of Housing and Urban Development (HUD) requirements and details the losses and needs resulting from the 2020 Wildfires and Straight-line Winds, including the unmet housing, infrastructure, economic revitalization, and mitigation needs. The Social Equity, Fair Housing, and Civil Rights section includes information and analysis of the post-disaster housing challenges faced by rural communities and barriers to recovery faced by certain federally protected classes who were impacted by the disaster. The information collected through the unmet recovery and mitigation needs assessment process serves as the foundation for the State's Community Development Block Grant – Disaster Recovery (CDBG-DR) program funding and prioritization decisions. To prepare this assessment, the Oregon Housing and Community Services Department (OHCS) consulted with and drew on data from the following organizations:

- Federal Emergency Management Agency (FEMA)
- Small Business Administration (SBA)
- HUD
- US Department of Agriculture
- Oregon Office of Emergency Management (OEM)
- Oregon Department of Land Conservation and Development (DLCD)
- Oregon Department of Environmental Quality
- Oregon Department of Human Services
- Oregon Employment Department
- Oregon Department of Consumer and Business Services
- Oregon Department of Energy
- Business Oregon
- Oregon builders and builders' associations
- Local and Tribal governments
- Public housing authorities
- Long Term Recovery Groups
- Community Based Organizations

3.1.1 Unmet Recovery Needs

Table 6 provides a summary of disaster impacts using federally available data from DR-4562 using an SBA-FEMA multiplier methodology that is similar to the one outlined in the Federal Register Notice (described in the Data and Methodology section of this Action Plan), as well as the methods for estimating unmet infrastructure and economic revitalization needs described in the Federal Register Notice. The unmet need is calculated by subtracting the resources available from the value of the total damages. However, the “Other Resources Available” includes private insurance paid claims for personal contents, loss of vehicles, and other expenses that are not included in the “Total Impact” assessment. This assessment significantly undervalues the remaining costs of damages and repairs from DR-4562.

Oregon’s Latine households make strong contributions to the state’s economy. Latine participation in the labor force is higher than white participation, and the number of Latine-owned businesses is increasing rapidly. Despite these contributions, however, Latine have lower income and higher poverty and child poverty rates than their white counterparts.

Table 6: HUD Unmet Needs Methodology

Category	Total Impact	Other Resources Available	Unmet Need (Total Impact minus Anticipated Available Resources)
Housing	\$248,076,000	\$1,126,953,000	\$(878,880,000)
Infrastructure	\$259,720,000	\$238,430,000	\$21,290,000
Economic Revitalization	\$32,089,000	\$126,370,000	\$(94,280,000)
Total	\$539,890,000	\$1,491,750,000	\$(951,870,000)

Table 7 provides a summary of disaster impacts from DR-4562 using an alternative methodology (described in the Data and Methodology section of this Action Plan) that considers the costs of recovering resiliently and equitably, given the affordable housing recovery needs and current increased reconstruction costs faced in the MID areas. This methodology is more reflective of the actual unmet need, which the State anticipates exceeds \$443 million. However, the “Other Resources Available” includes private insurance paid claims for personal contents, loss of vehicles, and other expenses that are not included in the “Total Impact assessment.” Therefore, the State anticipates this unmet need to undervalue the unmet recovery needs.

Table 7: Alternative Unmet Needs Methodology

Category	Data Source	Total Impact	Resources Available	Unmet Need (Total Impact less Applied Resources)	% of Total
Housing	Estimated Reconstruction or Replacement of Damaged Housing Units	\$1,318,697,000	\$1,126,953,000*	\$241,758,000	55%
Infrastructure	FEMA Public Assistance (Cat C-G + 15% Resilience)	\$130,533,000	\$102,156,000	\$28,377,000	6%
	FEMA Hazard Mitigation Grant Program	\$129,188,000	\$136,269,000	\$(7,081,000)	(2)%
	Additional Resilient Infrastructure Needs	\$281,965,000	\$131,965,000	\$150,000,000	34%
Economic Revitalization	SBA – Commercial Loss	\$32,089,000	\$1,994,000	\$29,974,000	7%
	Additional Commercial Losses – Line Item not Included in Calculation	Assessment still underway	\$124,378,000		
Total		\$1,892,470,000	\$1,499,340,000	\$443,030,000	100%

*The insurance value is likely higher than the amount available for home repair or reconstruction, as it may include claims and payouts for personal property, vehicles, and other costs not eligible under CDBG-DR (e.g., fences and outbuildings).

3.1.2 Ongoing Hazards and Risks

Wildfires have become more common and widespread in Oregon over the past few decades, and they often threaten communities where development (including housing) encroaches upon forest lands that are susceptible to fire. The total area burned by wildfire

in the United States, including in Oregon, has increased significantly since the 1980s, and nine of the 10 years with the most acreage burned have occurred since 2010s.¹ The table below highlights some of the more recent wildfire events and demonstrates an increased frequency of wildfires in Oregon. The two most recent events (in 2020 and 2021) were significantly more destructive than events in previous years, which is a trend that is unlikely to reverse in the face of climate change, extreme heat, and drought. The State of Oregon is experiencing a heightened risk of fire danger due to drought, tree mortality, and an increase in severe weather events.

Table 8: Chronology of Recent Severe Oregon Fires

Year	County	Description of Wildfire Event
2002	Josephine	Biscuit Fire destroyed four primary residences and 10 other structures, and put 15,000 residents on evacuation notice.
2010	Jackson	Oak Knoll Fire destroyed 11 homes in fewer than 45 minutes in Ashland.
2014	Wallowa	Buzzard Complex Fire burned more than 400,000 acres and significantly impacted rangeland and cattle farms.
2014	Grant	South Fork Complex Fire started with lightning strikes and burned 62,476 acres.
2015	Grant	Canyon Creek Complex Fire started by lightning and burned 110,422 acres, destroying more private property than any Oregon wildfire in the previous 80 years. The wildfire destroyed 43 homes and almost 100 other structures.
2015	Wallowa	Grizzly Bear Complex Fire started by lightning and burned 82,659 acres. The wildfire destroyed two homes and dozens of other structures.
2017	Multiple Counties	Over 1,000 fires (including Chetco Bar and Eagle Creek) started as human-ignited or ignited by lightening strikes, burning a total area of over 451,000 acres.
2020	Multiple Counties	Multiple Names/DR-4562 fires killed at least 11 people, burned more than 1 million acres, and destroyed more than 4,300 homes.
2021	Multiple Counties	More than 1,000 fires have burned more than 518,303 acres and destroyed more than 40 structures.

Including the risks from wildfires, Oregon is vulnerable to additional disasters as described in the Mitigation Needs Assessment section of this Action Plan. The 2020 Wildfires occurred during the ongoing COVID-19 pandemic response effort, and at the time of publication, COVID-19 continues to present additional risk to recovering communities and residents.

¹ Oregon State University, extension.oregonstate.edu/catalog/pub/em-9194-fire-faqs-have-size-severity-forest-wildfires-increased-oregon-across-west

During the development of this Action Plan, OHCS consulted with the Oregon OEM, DLCD, and local governments to understand the current and projected natural hazards and risks faced in the MID areas. For the creation of the Mitigation Needs Assessment, OHCS also drew heavily from the State’s Natural Hazards Mitigation Plan and local mitigation plans. Table 9 summarizes the highest natural hazard risks and threats faced in the MID areas. These risks and hazards will be factored into Oregon’s recovery and mitigation programming, as described further in each of the program sections and applicable sections under General Requirements.

Table 9: Summary of Natural Hazards Across HUD-Identified Most Impacted and Distressed Areas

High-Risk Threat	Medium-Risk Threat	Low-Risk Threat
Wildfire	Landslide	Volcanic Event
Earthquake	Drought	Tsunami
Winter Storm	Windstorm	
Flooding		

3.1.3 HUD-Identified Most Impacted and Distressed Areas

HUD requires funds to be used for costs related to unmet needs in the MID areas resulting from qualifying disasters. Oregon is required to spend at least 80%—or \$337,828,800—of all CDBG-DR funds to benefit the HUD-identified MID areas.

HUD provided Oregon with the following HUD-identified MID areas in the Allocation Announcement Notice:

- Clackamas County
- Douglas County
- Jackson County
- Lane County
- Lincoln County
- Linn County*
- Marion County

* For Oregon, HUD-identified a ZIP Code (97358) in Linn County as a MID area. Within the Consolidated Notice, HUD allows grantees to expand eligibility to the whole county when HUD designates a ZIP Code as a HUD-identified MID area. Oregon has expanded eligibility to include all of Linn County as a HUD-identified MID area.

3.1.4 Grantee-Identified Most Impacted and Distressed Areas

The Consolidated Notice allows Oregon to determine where to use up to 20% of the remaining amount of the CDBG-DR grant, provided that the funds are used to address unmet needs within areas that received a presidentially declared disaster declaration identified within DR-4562. The counties in Table 10 are all included in the presidentially declared disaster declaration for DR-4562. Of the FEMA Individual Assistance Program (IA) counties, only Klamath County is not included in the HUD-identified MID areas.

Table 10: DR-4562 Presidentially Declared Disaster Counties and Categories of Awarded Public Assistance

County	FEMAPA Cat A	FEMAPA Cat B	FEMAPA Cat C	FEMAPA Cat D	FEMAPA Cat E	FEMAPA Cat F	FEMAPA Cat G	FEMA IA
Benton	X							
Clackamas	X	X	X	X	X	X	X	X
Columbia	X							
Coos	X							
Deschutes	X							
Douglas	X	X	X	X	X	X	X	X
Jackson	X	X	X	X	X	X	X	X
Jefferson	X							
Josephine		X	X	X	X	X	X	
Klamath	X	X	X	X	X	X	X	X
Lake	X							
Lane	X	X	X	X	X	X	X	X
Lincoln	X	X	X	X	X	X	X	X
Linn	X	X	X	X	X	X	X	X
Marion	X	X	X	X	X	X	X	X
Multnomah	X							
Tillamook	X	X	X	X	X	X	X	
Wasco	X							
Washington	X							
Yamhill	X							

Through its consultation and data analysis process, the State has determined that the priority is to address housing and housing-related recovery and mitigation needs. Therefore, the State will include all FEMA IA-declared counties not already included by HUD in its grantee-identified MID areas:

- Klamath County

3.2 Housing Unmet Needs

The State of Oregon, in collaboration with local and national partners, undertook a substantial amount of post-disaster planning and data collection and analysis to leverage as many State and federal resources as possible. The [Housing Impact Assessment](#), written in collaboration with HUD, FEMA, OHCS, public housing authorities, and local nonprofits under the Housing Recovery Support Function, published in April 2021, provides a detailed summary of the disaster impacts on housing and the remaining needs. In addition, the [Oregon Disaster Housing Recovery Action Plan](#), published in June 2021, outlined housing goals and recovery strategies for the State. This Action Plan pulls substantially from these documents, but includes updates based on current information and requirements included in the Notices. This section of the Unmet Needs Assessment summarizes the disaster impacts on housing, drawing on data collected from FEMA IA, SBA Home Loans, private insurance providers, other State agencies, local governments, and nonprofits. This

Fair housing, civil rights data, and advancing equity through Targeted Universalism

OHCS shall use CDBG-DR funds in a manner that complies with its fair housing and nondiscrimination obligations. To ensure that the CDBG-DR programs comply with these requirements, OHCS has assessed disparate impacts to racial and ethnic minorities, concentrated areas of poverty, rural communities, and the recovery needs of impacted individuals with disabilities. This assessment will be used as a foundation for determining whether its planned use of CDBG-DR funds will have an unjustified discriminatory effect on or failure to benefit these survivors and areas.

To ensure programs are designed to be inclusive, OHCS will apply a **targeted universalism** approach to designing and implementing CDBG-DR programs. Within a targeted universalism framework, universal goals are established for all groups concerned. The framework then uses targeted processes and strategies to achieve those goals, based upon how different groups – including individuals with disabilities, racial and ethnic minorities, members of other protected classes, and survivors in rural communities – are situated within structures, culture, and across geographies to obtain the universal goal.

section also includes information on certain pre-disaster housing conditions that will impact State and local housing recovery efforts. OHCS also has analyzed barriers to access to recovery for protected classes, vulnerable populations, and underserved communities. The information captured herein and additional information collected through the public comment period and stakeholder consultation were used to develop the programs identified later in this Action Plan.

Through the public comment period and engagement, it is clear that there are common and unique housing recovery challenges experienced across the state by different communities and federally protected classes. Many impacted survivors have been unable to start or complete their recovery due to funding barriers, mental and physical health challenges, language barriers and insufficient resources. Other survivors have been able to cobble together enough to replace or reconstruct their homes, but now face financial hardship as they repay loans or try to replenish the savings and retirement they depleted to recover.

3.2.1 Disaster Damage and Impacts Summary of Need

As described further in Data Sources and Methodology section toward the end of the Action Plan, the State has calculated housing reconstruction or replacement needs using two approaches:

- **HUD/FEMA/SBA Multiplier Methodology:** Calculated using information available through federal datasets.
- **Alternative Methodology – Estimated Costs to Replace Damaged or Destroyed Housing:** Represents a more accurate reflection of the actual impacts and actual costs to rebuild. Through its damage assessments, engagement, and coordination, the State identified additional impacted residents who were not included in the federal datasets. The State’s assessments indicate that the costs to rebuild or replace damaged or destroyed housing are significantly higher than the projected estimates calculated through the federal unmet needs analysis process.

The total assessed housing need using the two methodologies—before deducting any other sources of funding—is included in the table below.

Table 11: Comparison of Need Calculation Methodologies

Need Calculation Methodology	Number of Impacted Households	Estimated Reconstruction or Replacement Need
HUD/FEMA/SBA Multiplier Methodology	3,032	\$248,076,254
Alternative Methodology: Estimated Costs to Replace Damaged or Destroyed Housing	4,326	\$1,318,697,454
Difference (additional need projected by the Alternative Methodology)	1,294	\$1,070,621,200

3.2.1.1 Limitations of Federal and Private Data

Through the needs assessment process, OHCS identified the limitations of the federal disaster impact data available to the State and HUD. To help overcome these limitations, OHCS has carried out significant outreach and engagement to supplement the federal data. To design and implement inclusive and equitable programming, OHCS will continue to collect information and will update its needs assessment in subsequent amendments. Some of the identified limitations of the federal data are included below:

- **FEMA Individual Assistance (IA) Data:**

The FEMA IA tables are included in the sections further below, as they are the data required by HUD. These aggregate tables were prepared by FEMA with data current as of February 15, 2022. The FEMA registration data are incomplete in presenting the full picture of the impacts on housing. Participation and registration

with FEMA IA are voluntary. The process can be overwhelming for survivors because of the documentation requirements, proof of ownership, limitations on legal residency status, and eligibility criteria that require appeals or follow-up from the participants, including from those households that are underinsured. Since the 2020 Wildfires, FEMA has undertaken considerable steps to make the FEMA IA application and documentation processes more streamlined and equitable, but at the time of FEMA IA intake for DR-4562, many of those processes were not in place. In addition, during the intake process for DR-4562, there was a coordinated application fraud scheme that is being investigated by FEMA and flagged within the FEMA IA data, which does call into question the accuracy of the FEMA IA data. Due to the timing of

Barriers to applying for FEMA's Individual Assistance, including documentation requirements, proof of citizenship and limitations on legal residency status, can result in incomplete data if Latine households are overwhelmed or fearful of reaching out for assistance.

DR-4562 and its overlap with COVID-19, the FEMA housing damage assessments were not performed in person. It also is important to note that FEMA IA Home Repair Assistance is intended to make the damaged home safe, sanitary, or functional. It is not intended to return the home to its pre-disaster condition and therefore neither the FEMA verified loss nor the FEMA IA award amounts should be used as a proxy for the actual costs to reconstruct or replace wildfire damaged or destroyed residential properties.

- **SBA Home Data:** The SBA disaster loan program also is a voluntary program and it is limited to impacted homeowners. SBA residential, fully repayable loans are limited to homeowners and homeowners must qualify through SBA's underwriting and eligibility review processes to access SBA loans. SBA verified loss data provide a better picture of the full cost of repair and replacement, as SBA loan amounts are based on an inspection that covers the full cost to restore a home. However, the SBA data are incomplete and fail to include many impacted residential structures.
- **Private Insurance Data:** While States can rely on National Flood Insurance Program data for events such as floods and hurricanes, fire damage and claims data must be collected from individual insurance companies. Individual insurance companies are inconsistent in how they categorize policies and claims, and they do not report insurance information into a centrally managed database. OHCS has worked closely with the Oregon Division of Financial Regulation and the State Insurance Commissioner to collect aggregate commercial and residential claims information through a data call to insurance providers. The data provided indicated that:
 - **Residential and commercial data:** Based on the 2020 data, there were 14,836 residential and commercial claims, of which 9,454 resulted in some form of eligible payment. Of those eligible claims, 4,123 represented a "total loss" or destroyed property. The total "case incurred loss" or the amount the insurance companies anticipate paying out for all claims was just under \$1.5 billion.
 - **Residential only data:** Based on 2021 data, there were 13,220 residential claims, of which 9,577 resulted in some form of eligible payment. Of those eligible claims, 2,792 represented a "total loss" or destroyed property. The total "case incurred loss" or the amount the insurance companies anticipate paying out for all residential claims is just over \$1 billion.

There are several known limitations to the data provided and basing the analysis on this data:

- Insurance providers do not classify claims or value damages consistently.
- Residential and commercial claims and payouts may include personal property, vehicles and contents payouts and some may only include structural damage payouts. Insurance providers could not consistently or accurately distinguish between contents and structural damages.
- The data call was limited to the major insurance providers in Oregon.
- Some policy holders hold multiple policies and therefore the claims do not necessarily reflect individual residences or businesses.
- The FEMA IA data indicates 69% of FEMA IA homeowners and 97% of renters with Major to Severe damages did not have any homeowners or renters insurance, respectively.

The results from surveys carried out by Disaster Case Managers, Long-Term Recovery Groups, Unete, CASA, and through the public engagement and public comment response indicate the majority of households who were insured face significant gaps between the insurance payout and the estimated costs to rebuild.

3.2.1.2 State and Local Housing Impact Data

The Oregon OEM is the State agency charged with leading and coordinating disaster response efforts. Beginning the week of September 28, 2020, while the disaster declaration was still open and ongoing, OEM conducted joint preliminary damage assessments with local government partners. These assessments indicated that more than 4,300 homes were significantly damaged or destroyed.

OEM maintains an updated website storyboard with recorded numbers of destroyed and significantly damaged residential properties.²

This assessment was subsequently updated with additional assessment information from local jurisdictions. The total number of homes (by structure type) that were either Major Damaged or Destroyed, as assessed by the State and local jurisdictions, is included in the table below. However, the State acknowledges that this dataset may exclude impacted residents and is continuing to work with local community-based organizations,

Impacted households with unconventional living situations, such as those living off the grid, in unpermitted dwellings, or in RVs on land they don't own, may have been missed by traditional damage assessments and therefore excluded from State datasets.

² Oregon Office of Emergency Management, Damage Assessment, experience.arcgis.com/experience/6c42bf70be214725b8dd0de8d407eca9/page/Home/eea2ed3680abe

community action agencies, and other housing support groups to understand the impacts on residents that were not captured in the State and local government assessments.

Table 12: Damaged or Destroyed Homes and Home Types by County

County	Single-Family Units	Multi-Family Units	Manufactured Homes	Major Damaged Homes	Destroyed/ Damaged Homes
Clackamas	62	0	0	0	62
Douglas	126	0	12	0	138
Jackson	610	328	1,561	9	2,508
Klamath	11	0	0	0	11
Lane	505	0	69	41	615
Lincoln	65	0	223	0	288
Linn	71	0	0	0	71
Marion	629	0	0	4	633
Total	2,079	328	1,865	54	4,326

3.2.2 Affordable Housing Shortage and Rising Costs

In many ways, the wildfire disaster was primarily a housing disaster. The unprecedented scale of the 2020 Wildfires, combined with the challenges of the COVID-19 pandemic, drastically increased Oregon’s already tenuous housing and homelessness crises. Prior to the 2020 Wildfires, Oregon’s vacancy rate was near the State’s record low and a third lower than the national average. This means that the State had a significant lack of available housing—particularly affordable housing—even before the COVID-19 pandemic and 2020 Wildfires.

The severity of the housing shortage, especially for lower income households, has been well documented in Oregon for years. In 2020, EcoNorthwest conducted Oregon’s first ever Regional Housing Needs Analysis (RHNA) on behalf of OHCS and Oregon DLCD. The RHNA analyzes housing needed for all income levels by region and is being used as a planning tool for informing the State’s CDBG-DR programs. A key finding of the RHNA is that Oregon will need to produce 30,000 to 40,000 new homes per year over the next 5 years to meet demand and restore balance to the market. The State’s annual production, as measured by residential building permits, is approximately 20,000 per year—half of what it should be.³

The State of Oregon analyzed and developed a [Report on Addressing Barriers to Home Ownership for People of Color in Oregon in 2019](#). This report, American Community Survey data, and the OHCS [online data dashboard for homeownership rates](#) show that homeownership rates are lower for communities of color and Latine households in Oregon than for whites. **People of color and Latine households disproportionately experience lending discrimination, credit barriers, language and legal status barriers, and racial wealth gaps.**

In addition, prior to the COVID-19 pandemic and 2020 Wildfires, the State was experiencing significant increases in housing costs. The statewide median home value rose by 40% (around \$100,000) between 2010 and 2018. Similarly, the median rent also increased by nearly \$300 (just above 40% during the same period).⁴

3.2.2.1 Pre-Disaster Owner-Occupied and Rental Vacancy Rates

HUD’s “Market at a Glance” includes a snapshot of the most current vacancy data available for the State of Oregon and the impacted counties. Statewide, the data indicate a 2019 total housing stock of 1.8 million units, with an average 2017–2019 rental vacancy rate around 4% and a sales vacancy rate around 1.3%. Compared with the national averages of 6.7% and 1.4%,⁵

The wildfires exacerbated the already low inventory of affordable housing that existed pre-disaster, making the return to safe, affordable housing even more challenging for low-and moderate-income households and households of color.

respectively, even before the disaster event, Oregon lacked sufficient housing to meet the demand. The impacted county pre-disaster vacancy rate data range from 0.7% (Douglas)

³ [2020 RHNA Technical Report and Oregon Disaster Housing Recovery Action Plan \(June 2021\)](#), p. 9.

⁴ State of Oregon, 2021–2025 Consolidated Plan, <https://www.oregon.gov/ohcs/development/Pages/consolidated-plan.aspx>, p.119

⁵ U.S. Census Bureau, Rental and Homeowner Vacancy Rates by Area, <https://www.census.gov/housing/hvs/index.html> and <https://www.census.gov/housing/hvs/data/ann20ind.html>

to 6.1% (Lincoln) for rentals, and 0.8% (Lane) to 3.8% (Jackson) for sales. Naturally, the major damage and destruction, as reported by OHCS, of more than 4,300 units in the impacted counties will significantly affect vacancy rates as survivors vie for available housing.

Table 13: Pre-Disaster Residential Percentages

(a) Pre-Disaster Vacancy Rates of Renter and Owner-Occupied Housing, by County

County	Renter-Occupied Vacancy Rate (%)	Owner-Occupied Vacancy Rate (%)
Clackamas	3.2	1.1
Douglas	0.7	3.4
Jackson	3.3	3.8
Klamath	4.3	1.3
Lane	2.0	0.8
Lincoln	6.1	3.1
Linn	2.1	1.1
Marion	5.8	1.3

Source: 2019 American Community Survey 5-year Estimates

The table below displays the percentage of renter vs. owner occupied housing stock for each county in the impacted area, based on American Census Survey data. In each of these impacted counties, the majority of housing units were owner occupied, with Clackamas having the highest at 71.8% and Lane having the lowest at 58.67%.

(b) Pre-Disaster Renter and Owner-Occupied Housing, by County

County	Owner occupied (#)	Owner occupied (%)	Renter occupied (#)	Renter occupied (%)
Clackamas	111,885	71.08%	45,523	28.92%
Douglas	30,986	68.17%	14,470	31.83%
Klamath	17,924	64.28%	9,962	35.72%
Lane	89,359	58.67%	62,953	41.33%
Lincoln	13,977	65.63%	7,321	34.37%
Linn	30,748	64.38%	17,014	35.62%
Marion	71,101	60.24%	46,937	39.76%
Jackson	55,792	63.23%	32,449	36.77%

Source: 2019 American Community Survey 5-year Estimates

3.2.2.2 Pre-Disaster Rent Burden

Rent burden is defined as paying 30% or more of household income on gross rent in the past 12 months.⁶ An analysis by the Oregon Health Authority, looking at American Community Survey (ACS) data, evaluated the rent burden in Oregon compared with the United States from 2007 to 2019. This pre-disaster dataset showed that, on average, in Oregon, 52% of renters were paying more than 30% of their income on housing (slightly higher than the U.S. average of 50%). Furthermore, the lowest income households have the highest levels of rent burden, with 89% of Oregon households earning less than \$19,999 annually. Looking at pre-disaster housing in the impacted counties, the rent burdens in Jackson and Lane counties are above the state average. Lane County had the highest rent burden at 57%⁷. Conversely, Douglas County was observed to have 48% of renters being rent-burdened, which is the lowest rate recorded among the FEMA IA-declared counties.

The data are helpful for assessing affordable housing throughout the State and designing programs to not only fill a housing need but also do so in a manner that avoids furthering the rent burden for the lowest income households.

3.2.2.3 Pre-Disaster Housing Value Range

Given the diversity of populations and environments, the cost of housing in Oregon varies greatly, especially between metropolitan and rural areas. The median value of an owner-occupied home across the State was \$312,200 in 2019. Meanwhile the median gross rent was around \$1,100. Median home values in the eight impacted counties varies widely—from \$170,600 (Klamath) to \$395,100 (Clackamas).

Table 14: Evidence of Cost Burden by County

County	Median Home Value (in \$)	Median Gross Rent (in \$ per month)	Building Permits Issued (2020)
Clackamas	\$395,100	\$1,295	2,011
Douglas	\$199,200	\$824	243
Jackson	\$280,300	\$993	886
Klamath	\$170,600	\$772	152
Lane	\$263,200	\$989	1,391
Lincoln	\$251,200	\$924	250

⁶ Oregon Health Authority, Social Determinants of Health – Rent Burden, <https://www.oregon.gov/oha/PH/ABOUT/Documents/indicators/rentburden.pdf>

⁷ DR-4562-OR: Housing Impact Assessment, [https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20\(FINAL%202021-04-30\).pdf](https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20(FINAL%202021-04-30).pdf), p. 10

County	Median Home Value (in \$)	Median Gross Rent (in \$ per month)	Building Permits Issued (2020)
Linn	\$221,600	\$964	796
Marion	\$247,100	\$985	1,743
Total	N/A	N/A	7,472

Source: U.S. Census Bureau QuickFacts.^{7F8}

The rising costs of housing, the limited availability of housing, and the number of renters experiencing housing cost burdens in the counties impacted by the 2020 Wildfires highlight the need for reconstruction, replacement, and enhancement of affordable housing.

3.2.3 Role of Manufactured Housing as Affordable Housing in Oregon

A manufactured housing unit (MHU), mobile home, or manufactured home is a type of prefabricated housing that is constructed in a factory and then transported to a site, to owned or leased land or a manufactured housing park for installation. These homes are built to a federal code administered by HUD that went into effect in 1976. Factory-built homes constructed before 1976 are called “mobile homes.” Modular home components also are prefabricated in a factory but differ from MHUs because they are built to a local building code, assembled on the permanent housing site, and cannot be easily transported to another site.

3.2.3.1 Manufactured Housing in Oregon

Prior to the 2020 Wildfires, Oregon had approximately 1,067 manufactured housing parks (MHPs) with a total of 62,397 lots. Only 3,122 of the lots within these parks are identified as vacant. Of the listed parks, 325 (30.46%) are only open to occupants who are over age 55; the other 744 parks (69.54%) are not agerestricted.⁹

In 2017, the State revised their land use statutes to facilitate the expansion of manufactured housing opportunities. The State directed local governments to revise their comprehensive land use plans to include manufactured homes in their urban growth

⁸ U.S. Census Bureau QuickFacts, Klamath County, Oregon, [U.S. Census Bureau QuickFacts: Klamath County, Oregon](#)

⁹ Oregon State University, A Review of Manufactured Housing Policies (2018), https://appliedecon.oregonstate.edu/sites/agscid7/files/applied-economics/final_paper_bewley.pdf

boundaries as “needed housing”¹⁰ inside urban growth boundaries. The State also disallowed local governments from setting tighter restrictions on manufactured homes and the placement of MHUs than those set forth by the State.

3.2.3.2 Housing Affordability and Manufactured Housing

Manufactured housing may serve as part of the solution to Oregon’s affordable housing challenges. At less than half the average cost per square foot compared with site-built homes, manufactured housing is one of the largest sources of **unsubsidized** affordable housing in the country. For example, while manufactured homes represent about 8% of the State’s total housing volume, they constitute 16% of the affordable housing stock.¹¹

Similarly, the owners of manufactured housing tend to spend considerably less of their income on housing than residents of other types of homes, especially among households with incomes at or below the area median. However, almost half of the State’s existing manufactured homes were built before 1980, which could present significant financial challenges for residents moving forward.

Manufactured housing provides a lower cost homeownership option for prospective buyers. Of the manufactured home residents, 78% own their unit compared with 62% of residents of all other types of housing. While the cost of homeownership may be less, there are some financial concerns with regard to insuring MHUs. Generally, site-built homes are insured for their replacement value—meaning that the insurance will cover the full cost to replace the home, while MHUs are generally covered at actual cost value—meaning that they depreciate over time and the coverage only provides the current depreciated value. This has a significant impact on disaster-affected MHUs.

The costs for renting pads or lots in privately owned MHPs are increasing in many HUD-identified MID areas and throughout the State. OHCS has worked closely with local nonprofit organizations,¹² resident cooperatives, housing authorities, and other entities to preserve the affordability of pad or lot rents and prevent MHP closures through their

¹⁰ OregonLaws, ORS 197.303 “Needed housing” defined, https://oregon.public.law/statutes/ors_197.303

¹¹ Prosperity Now, Oregon Manufactured Housing Opportunity Profile: Data Snapshot, <https://prosperitynow.org/sites/default/files/resources/Affordable%20Homeownership/Snapshots/Oregon%20MH%20Data%20Snapshot.pdf>

¹² Network for Oregon Affordable Housing, Manufactured Home Parks, <https://noah-housing.org/programs/manu/> and CASA of Oregon, Manufactured Housing Cooperative Development, <https://casaoforegon.org/manufactured-housing/>

Preservation of Manufactured Dwelling Parks Program and various other multifamily development and/or land acquisition programs.¹³

3.2.4 Labor Shortages and Increased Costs of Residential Construction

Oregon, like many other parts of the country, faces challenges related to construction, manufactured home supply chains, and increased labor and material costs. Construction costs have increased 20% to 25% since the September 2020 Wildfires, forcing many lower income property owners or property owners with insufficient funds to postpone rebuilding. The construction industry has been one of the fastest growing industries in Oregon, before and during COVID-19, and is facing a labor shortage. In a 2021 publication from the Oregon-Columbia Chapter of Associated General Contractors,¹⁴ 89% of contractors reported having difficulty finding craft workers, 88% of firms are experiencing project delays, and 93% are affected by rising material prices. These shortages and increases in costs have resulted in an average 2-year timeline for constructing or reconstructing a single-family, stick-built home. The nation also is facing delays in the production of manufactured and other prefabricated homes, with an anticipated production timeline of more than a year for new manufactured homes to be delivered after they are ordered.¹⁵

As described in Table 15 below, 2,500 housing units were destroyed or damaged in Jackson County in the 2020 Wildfires, a number that is 2.5 times the number of residential building permits issued in 2019. Lane County lost 615 homes—all in unincorporated communities of the McKenzie River Valley—which is three times greater than the average number of annual permits issued by the county in its unincorporated area. Across the State, the number of homes damaged or destroyed equate to 19% of all residential building permits in one year.¹⁶ In addition to the magnitude of loss, these figures speak to the scale of the rebuilding challenges in the impacted rural communities and underscore how important

¹³ OHCS, NOFA: Preservation of Manufactured Dwelling Park, NOFA #2020-8, <https://www.oregon.gov/ohcs/development/Pages/nofa-ghap-manufactured-parks.aspx>

¹⁴ Associated General Contractors, Oregon-Columbia Chapter, Construction Workforce Shortages Reach Pre-Pandemic Levels (September 2021), <https://www.agc-oregon.org/uncategorized/construction-workforce-shortages-reach-pre-pandemic-levels-2/>

¹⁵ Oregon Disaster Housing Recovery Action Plan (June 2021), <https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/07-22-21-Oregon-Disaster-Housing-Recovery-Action-Plan-June-2021.pdf>, p. 14

¹⁶ Oregon Disaster Housing Recovery Action Plan (June 2021), <https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/07-22-21-Oregon-Disaster-Housing-Recovery-Action-Plan-June-2021.pdf>, p. 8-9

local and contractor capacity will be to housing recovery. Like much of the country, Oregon was far behind in producing sufficient housing to meet current and future demand, even before the wildfires.

Table 15: 2020 Wildfire Destruction and Damages as a Percentage of Annual Residential Building Permits

Impacted County	Destroyed & Damaged Homes (1)	Annual Residential Building Permits (2)	Lost Homes as a Percentage of Pre-Wildfire Area Permits
Clackamas (3)	62	826	8%
Douglas	138	243	55%
Jackson	2,373	921	258%
Klamath	11	137	8%
Lane (3)	615	214	287%
Lincoln	288	333	86%
Linn	71	716	10%
Marion	633	1,638	39%
Total	4,191	5,028	83%
2019 Oregon Permits		22,037	19%

Sources:

1. Oregon Office of Emergency Management.
2. HUD Office of Planning and Research, most recent annual data from 2019 or 2020.
3. Clackamas and Lane counties permit data are for unincorporated areas only.

3.2.4.1 Sheltering and Transitional Housing Post-Disaster

Following the disaster declaration, FEMA, Oregon OEM, the Oregon Health Authority, the Oregon Department of Human Services, Red Cross, and OHCS worked to develop a range of sheltering and housing solutions, using a multi-phased operations approach, as described in the Disaster Sheltering and Housing Strategy.¹⁷ Since the declaration, FEMA approved multiple transitional housing programs and related supports for Oregon's survivors, including non-congregate sheltering and FEMA Direct Housing missions in Jackson, Lane, Linn, and Marion counties.

¹⁷ FEMA, DR-4562-OR: Disaster Sheltering and Housing Strategy, <https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/FEMA-Disaster-Sheltering-Housing-Strategy-DR4562.pdf>

The long-standing shortage of housing, especially affordable housing, meant that wildfire survivors with the fewest resources could not find a new place to live. The loss of housing because of the wildfires was further stressed by the ongoing global pandemic. Many of the displaced wildfire survivors were placed in hotels, motels, and other non-congregate shelters to reduce transmission of the COVID-19 virus.¹⁸ Untold numbers of other survivors doubled-up, resorted to camping, or otherwise remained precariously housed. The Oregon Department of Human Services (ODHS) worked closely with the American Red Cross to help wildfire survivors access shelter.¹⁹

At the time of publication, nearly 400 survivors remain housed through FEMA's Direct Housing mission and/or through non-congregate sheltering in hotels or recreational vehicles (RVs) through programs administered by ODHS.²⁰ Disaster case managers (overseen by ODHS in partnership with nonprofit organizations and funded through FEMA) are helping residents move through their permanent housing plans to move out of FEMA-funded temporary housing. This work is being supplemented by State of Oregon funding to Community Action Agencies to provide specialized "housing navigation" assistance in addition to disaster case manager (DCM) services. FEMA also is implementing the FEMA Temporary Housing Unit (THU) Sales and Donations Program,²¹ whereby participants in the Direct Housing mission are given the option of purchasing their FEMA THU.

In fall 2021, OHCS partnered with community action agencies and long-term recovery groups, through sub-recipient agreements, to administer the State-funded Wildfire Recovery and Resilience Account (WRRRA). WRRRA provides flexible funding for wildfire survivors with a verified housing impact. Funds may be used for a wide range of activities, including rental assistance and related supports, as well as for reconstruction or replacement of damaged housing. The program prioritizes low-income households and requires the equitable distribution of funding to high-risk participants facing housing insecurity. This program is helping many survivors transition out of FEMA sheltering

¹⁸ Oregon Disaster Housing Recovery Action Plan (June 2021), <https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/07-22-21-Oregon-Disaster-Housing-Recovery-Action-Plan-June-2021.pdf>, p. 2

¹⁹ Oregon Disaster Housing Recovery Action Plan (June 2021), <https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/07-22-21-Oregon-Disaster-Housing-Recovery-Action-Plan-June-2021.pdf>, p. 2

²⁰ Oregon Office of Emergency Management, Oregon Wildfire Response and Recovery Overview, <https://experience.arcgis.com/experience/6c42bf70be214725b8dd0de8d407eca9>

²¹ FEMA, Individual Assistance Program and Policy Guide, https://www.fema.gov/sites/default/files/2020-07/fema_individual-assistance-program-policy-guide_2019.pdf, p. 118

and transitional housing programs and into housing that is more stable or suitable for their households.

3.2.5 Single-Family vs. Multifamily Needs: Owner Occupied vs. Tenant

Based on data for the eight counties approved for FEMA IA Individuals and Household Program (IHP), it is estimated that 59% of the impacted residents were homeowners and 41% were tenants. While this information is not inclusive of all impacted residents, it is the only data set available specific to fire survivors that includes a breakout of renters and homeowners, and therefore will be used to inform initial programming.

Table 16: IHP Awards: owners and Tenants

FEMA Individual Assistance (IA)	# of Owner Applicants	# of Tenant Occupants
Total Registrants	6,958 (29%)	17,055 (71%)
Total With IHP Award	1,914 (59%)	1,329 (41%)

3.2.5.1 Definition of Affordable Rents, Income Limits for Tenants, and Minimum Affordability Periods

The State has included the definitions of affordable rents, income limits for tenants and minimum affordability periods within each of the applicable program descriptions further below.

3.2.5.2 FEMA IA – Owner Occupied

Table 17: FEMA IA Owner-Occupied by County

County	Number of Applicants	Number of Inspections	Number of Inspections with Damage	Number Received IHP	Total FEMA Verified Loss	Avg. FEMA Verified Loss
Clackamas	983	163	141	93	\$1,870,857.57	\$13,268.49
Douglas	521	119	110	51	\$3,235,475.33	\$29,413.41
Jackson	2,385	948	935	1,098	\$49,263,081.27	\$51,638.45
Klamath	117	27	26	4	\$374,805.68	\$14,415.60
Lane	886	214	197	224	\$8,983,145.86	\$45,599.73
Lincoln	478	145	136	179	\$5,722,512.69	\$41,467.48
Linn	404	87	77	67	\$2,746,631.96	\$35,670.54
Marion	1,184	211	191	198	\$12,682,036.25	\$66,052.27
Total	6,958	1,914	1,726	1,914	\$74,863,532.59	\$274,447.99

Data from Federal Emergency Management Agency Information Data and Analysis (FIDA) 40449 DR-4562, February 17, 2022.

3.2.5.3 FEMA IA – Tenant Applications

Table 18: FEMA IA Tenant by County

County	Number of Applicants	Number of Inspections	Number of Inspections with Damage	Number Received IHP	Total FEMA Verified Loss	Avg FEMA Verified Loss
Clackamas	1,337	190	142	80	\$747,401.32	\$5,226.58
Douglas	10,950	590	505	46	\$4,060,382.99	\$7,977.18
Jackson	2,179	875	828	701	\$4,482,376.78	\$5,406.97
Klamath	146	17	17	9	\$85,997.61	\$5,058.68
Lane	877	255	219	173	\$1,113,477.66	\$5,061.26
Lincoln	323	117	105	94	\$483,023.99	\$4,600.23
Linn	349	80	57	44	\$246,930.61	\$4,332.12
Marion	894	268	208	182	\$994,323.87	\$4,757.53
Total	17,055	2,392	2,081	1,329	\$12,213,914.83	\$42,420.55

Data from FIDA 40449 DR-4562, February 17, 2022.

3.2.5.4 FEMA IA – Applications by Housing Type

Table 19: FEMA IA Applications by Housing Type

Residence Type	Number of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	240	0.4%	99.6%	0.0%	7.8%
Assisted Living Facility	14	0.0%	100.0%	0.0%	0.5%
Condo	30	33.3%	66.7%	0.0%	1.0%
House/Duplex	1,330	31.3%	68.7%	0.0%	43.1%
Mobile Home	1,153	73.2%	26.8%	0.0%	37.4%
Other	8	50.0%	50.0%	0.0%	0.3%
Townhouse	114	34.2%	65.8%	0.0%	3.7%
Travel Trailer	195	84.6%	15.4%	0.0%	6.3%

Data from FIDA 40449 DR-4562, February 17, 2022.

3.2.5.5 FEMA Real Property Damage: Owner-Occupied Units

Table 20: FEMA IA Owner-Occupied Damage Level by County

County	Severe	Major – High	Major – Low	Minor – High	Minor – Low
Clackamas	7	9	0	0	114
Douglas	17	8	1	0	75
Jackson	710	62	1	1	155
Klamath	1	0	0	0	19
Lane	53	22	0	4	100
Lincoln	73	14	0	1	42
Linn	19	2	0	5	46
Marion	73	24	1	2	86
Total	953	141	3	13	637

Data from FIDA 40449 DR-4562, February 17, 2022.

3.2.5.6 FEMA Real Property Damage: Rental Units

Table 21: FEMA IA Tenant Damage Level by County

County	Severe	Major – High	Major –Low	Minor – High	Minor – Low
Clackamas	38	47	6	33	19
Douglas	348	87	18	39	17
Jackson	213	333	119	103	61
Klamath	6	4	1	2	4
Lane	55	79	18	40	28
Lincoln	19	39	11	21	15
Linn	12	14	9	13	9
Marion	54	56	19	37	43
Total	745	659	201	288	196

Data from FIDA 40449 DR-4562, February 17, 2022.

3.2.6 Public Housing and Affordable Housing

Of the Oregon counties designated for FEMA IA, there is a public housing authority (PHA) in each of the eight counties (which includes the HUD MID areas and Klamath, the Grantee-identified MID).

3.2.6.1 Housing Choice Voucher Households²²

Housing choice voucher (HCV) households are qualified low-income, senior, and/or disabled households receiving rental assistance (a subsidy) to live in participating rental housing (with landlords) in their communities. These eight PHAs assist 1,428 households with public housing and 12,104 households with subsidies.

During the 2020 Wildfires, many PHA families had to temporarily evacuate while there was a direct threat to their homes. The public housing units did not receive any permanent impacts by the wildfires (i.e., no damages or displacements). However, four of the eight PHAs in the designated counties reported a total of 75 displaced HCV households. The four impacted PHAs were the Housing Authority of Lincoln County, Homes for Good (Lane County), the Marion County Housing Authority, and the Housing Authority of Jackson County.

Since the wildfires, 72 out of 75 displaced HCV households have been successfully rehoused. The remaining HCV households are in Lane, Lincoln, and Marion Counties. The PHAs continue to work through solutions for each of these participants to accommodate their post-disaster housing and location needs.

There are 165 HUD multifamily housing properties in the eight counties declared for FEMA IA. These properties contain 8,582 units, of which 4,315 receive project-based rental assistance. The HUD Office of Multifamily Housing Programs reported the evacuation of more than 500 units/households on 10 properties in the wildfire-threatened areas of Lincoln, Jackson, and Clackamas counties. By September 21, 2020, the office reported that all evacuated residents had returned to their respective properties.

²² DR-4562-OR: Housing Impact Assessment, [https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20\(FINAL%202021-04-30\).pdf](https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20(FINAL%202021-04-30).pdf), p. 24-25 and consultation with PHAs in impacted counties

3.2.6.2 OHCS Housing Portfolio²³

OHCS maintains asset management oversight over a portfolio of 1,150 projects statewide, totaling almost 57,000 units, consisting of projects funded with federal and State tax credits, bonds, other federal funding (e.g. HOME and Housing Trust Funds, and State funding. More than 1,000 projects (about 53,000 units) are residential rental, with the balance comprising a mix of manufactured housing parks (MHPs), assisted living and other residential facilities, transitional housing, shelters, and one lease-to-own project. Of the total units, 75% are targeted to households at 50% to 60% of area median income.

Within the eight disaster-declared counties with FEMA IA, there are 363 residential rental properties that are part of the OHCS portfolio. These include 15,000 residential rental units, 13 MHPs with a total of 745 units (in Lane, Clackamas, and Douglas counties only), and 23 assisted-living properties totaling 1,250 units.

Of the OHCS projects, three properties in Jackson County, totaling 127 units, were severely damaged (lost).

Table 22: OHCS Assisted Severely Damaged Housing Projects

Property Name	Number of Units	City/County	Population
Anderson Vista	36	Talent/Jackson	Farmworker
Brookside Rose (Rose Court)	36	Phoenix/Talent	Seniors or Individuals with Disabilities
Northridge Center	55	Medford/Jackson	Seniors

Data from the DR-4562-OR Housing Impact Assessment – April 30, 2021.

3.2.6.3 Multi-Family HUD-Assisted Housing

There are 165 HUD multifamily housing properties in the eight counties declared for FEMA IA. These properties contain 8,582 units, of which 4,315 receive project-based rental assistance. The HUD Office of Multifamily Housing Programs reported the evacuation of more than 500 units/households on 10 properties in the wildfire-threatened areas of Lincoln, Jackson, and Clackamas counties. By September 21, 2020, the office reported that all evacuated residents had returned to their respective properties.

²³ DR-4562-OR: Housing Impact Assessment, [https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20\(FINAL%202021-04-30\).pdf](https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20(FINAL%202021-04-30).pdf), p. 24

Oregon Housing and Community Services worked with HUD to develop the Housing Impact Assessment related to the DR-4562 wildfires. The data in the below table are the result of this collaboration. Minor damages to HUD assisted properties were assessed but no remaining unmet needs were identified as of the time of the publication of the Housing Impact Assessment or Action Plan.

Table 23: HUD Assisted Properties

Type of Damage	Number of Properties	Number of Units	Number of Units Assisted	Number of Units Waiting for Assistance
No Damage	157	8,066	4,092	3,974
No Utilities	2	170	50	120
Minor Damage	5	264	173	91
No Assessment	1	82	0	82

Data from the DR-4562-OR Housing Impact Assessment – April 30, 2021.

3.2.6.4 Public Housing Authorities Damaged

The State communicated with each public housing authority during the development of the Housing Impact Assessment in early 2021 and followed up during the development of the Unmet Needs Assessment in fall 2021 for the initial Action Plan. Only the Housing Authority of Jackson County faced unmet recovery needs for their impacted properties and the State has provided significant resources through Disaster tax credits, modular homes, and state funding to help address their unmet recovery needs and build additional affordable housing.

Table 24: Public Housing Authority Impacted Properties

County	Total PHAs	Total PHAs Damaged	No. of Units Damaged
Clackamas	1	0	0
Douglas	1	0	0
Jackson	1	1	127
Klamath	1	0	0
Lane	1	0	0
Lincoln	1	0	0
Linn	1	0	0
Marion	1	0	0

Data from the DR-4562-OR Housing Impact Assessment – April 30, 2021.

3.2.6.5 Owner with Unmet Needs in a Floodplain

DR-4562 was not a flood event. However, the State received flood location data from FEMA on the location of IA applicants, which is reflected in the table below. The State estimates this table significantly undercounts the number of properties that were wildfire damaged and located in the special flood hazard area (100-year floodplain) or in the regulatory floodway (floodway), particularly amongst disaster-impacted manufactured homes. Many of the damaged manufactured housing parks have properties located in the floodplain and some damaged properties in Lane County are known to be located in the floodway.

Through the environmental review process, the State will verify whether each property falls within the 100-year floodplain or the floodway and will ensure environmental, elevation, and flood insurance requirements are met and applied to each property, as applicable. No CDBG-DR assistance will be used to replace, repair or reconstruct homes located in the regulatory floodway.

Table 25:

Damage Category	All Owners	MHU Owners	No HOI	No Flood Ins
Severe	4	4	4	4

Data from FIDA 40449 DR-4562, February 17, 2022.

3.2.6.6 Insurance Claims and Losses in Disaster-Impacted Areas

Data for events such as floods and hurricanes, fire damage and claims data must be collected from individual insurance companies. Individual insurance companies are inconsistent in how they categorize policies and claims, and they do not report insurance information into a centrally managed database. OHCS has worked closely with the Oregon Division of Financial Regulation and the State Insurance Commissioner to collect aggregate commercial and residential claims information through a data call to insurance providers. The insurance providers account for insurance policies and claims differently; therefore it is known that many of these losses and claims include personal property, vehicles, and structures that are not typically eligible for CDBG-DR assistance (e.g., fences, out buildings, etc.). Therefore, these claims and losses overvalue the amount of insurance available to support residential property recovery from DR-4562.

Table 26: Residential Insurance Claims by County

County	No. of Claims	No. of Claims Resulting in Loss	Direct Incurred Losses (\$)
Clackamas	3,073	2,231	51,722,214
Douglas	236	149	43,206,580
Jackson	3,896	2,975	368,785,649
Klamath	62	49	3,265,150
Lane	1,907	1,269	255,642,143
Lincoln	1,066	831	61,017,713
Linn	1,423	158	150,146,301
Marion	1,450	985	154,580,203
Total:	13,113	8,647	\$1,088,365,953

Data from Oregon Division of Financial Regulation 2020 Wildfire Homeowner Claims Data Call Results. Data submitted as of 12/31/2021.

3.2.6.7 Total Home Loans Approved by the SBA

The Small Business Administration provides low-interest loans to homeowners who have suffered damage from natural disaster events in order to help the homeowner recover more swiftly. After a homeowner applies for a loan from the SBA the loan undergoes an approval process and upon approval of the loan application an amount is determined and presented to the applicant. From here the homeowner can accept the terms of the loan or decide to cancel their loan and decline the funds. The two below tables describe the number of home loans that were approved by the SBA with one including the loans that were subsequently cancelled by SBA or the homeowner and the other excluding those cancelled loans, effectively showing only the active loans.

Table 27: Home Loans Approved by SBA

**(a) Number of Home Loans with
Cancelled Loans**

County	No. of Home Loans With Cancelled Loans
Clackamas	40
Douglas	11
Jackson	269
Klamath	3
Lane	54
Lincoln	55
Linn	24
Marion	84
Total	540

**(b) Number of Home Loans
without Cancelled Loans**

County	No. of Home Loans With Cancelled Loans
Clackamas	20
Douglas	4
Jackson	147
Klamath	1
Lane	22
Lincoln	26
Linn	11
Marion	42
Total	273

Data from SBA Reports, January 2022.

3.2.7 Social Equity, Fair Housing, and Civil Rights

3.2.7.1 Affirmatively Further Fair Housing

OHCS has designed their CDBG-DR programs in a manner that is consistent with the agency's commitment and obligation to affirmatively further fair housing.

Based on the 2021 Analysis of Impediments to Fair Housing Choice,²⁴ the research findings and impediments faced in Oregon include:

- Members of protected classes, particularly people with disabilities and people of color experience disparities in rental housing choice.
- People of color disproportionately experience barriers to attaining homeownership.
- Members of protected classes disproportionately experience barriers to accessing economic opportunity.

²⁴ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, oregon.gov/ohcs/development/Documents/Attachment%20B%20-%202021%20Proposed%20FHAP%20Report.pdf, pages 11–16.

- Residents still lack knowledge of their fair housing rights, are not empowered to take action, and have very limited fair housing resources locally.

Within each program description, the State will identify ways in which CDBG-DR assistance will help address these impediments and achieve OHCS's obligation to affirmatively further fair housing, as applicable.

3.2.7.2 The Use of Data to Make Funding Decisions to Advance Equity and Reduce Barriers

Through its long-established policy making and program design processes, OHCS is committed to using data, performance metrics, and qualitative and quantitative information to ensure programs help advance equity and reduce barriers. This section outlines the OHCS policy-making governance structure, the agency's guiding documents, and includes additional analysis of impacts to vulnerable populations,^{24F25} members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, concentrated areas of poverty, socially vulnerable areas, and historically underserved communities.^{25,26}

This information provides a foundation for understanding the additional needs of survivors and for ensuring programs are implemented equitably, or in a manner that understands and addresses disparities and additional needs across race, ability, class, age, ethnicity, gender, and other characteristics.

3.2.7.2.1 Housing Stability Council and OHCS Statewide Housing Plan

3.2.7.2.1.1 Housing Stability Council

All CDBG-DR Action Plans and Substantial Amendments will be presented to the Oregon State Housing Stability Council (the Council or HSC) for review.²⁷

²⁵ HUD defined vulnerable populations as: "A group or community whose circumstances present barriers to obtaining or understanding information or accessing resources."

²⁶ HUD defines underserved communities as: "Refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. Underserved communities that were economically distressed before the disaster include, but are not limited to, those areas that were designated as a Promise Zone, Opportunity Zone, a Neighborhood Revitalization Strategy Area, a tribal area, or those areas that meet at least one of the distress criteria established for the designation of an investment area of Community Development Financial Institution at 12 CFR 1805.201(b)(3)(ii)(D)"

²⁷ OHCS, Housing Stability Council, Bylaws, <https://www.oregon.gov/ohcs/hsc/Pages/index.aspx>

The Council provides leadership in, and reviews and sets policy for, the development and financing of affordable housing throughout the state of Oregon. The Council, with the advice of the Executive Director of OHCS, sets policy and approves or disapproves rules and standards for programs, and approves or disapproves loans and grants, and carries out the provisions of [ORS 456.567](#); and [ORS 456.571](#). The nine-member Council is charged with meeting the tremendous need for the provision of affordable housing for lower-income Oregonians. The Council members are appointed by the Governor, subject to confirmation by the Senate under [ORS 171.562 and 171.565](#).

Per their charter, the Council:²⁸

- Helps establish strategic direction and a policy framework for OHCS
- Helps the Director to foster constructive partnerships with other state agencies and key partners engaged in housing and community services
- Sets policy for and issues decisions regarding loans, grants, and funding awards
- Advises policymakers
- Informs the OHCS Director's annual operating plan and biennial budget, and oversees OHCS operations through regular reports from the Director
- Advocates at all levels on behalf of the Department and affordable housing

3.2.7.2.1.2 Statewide Housing Plan

The 2019-2023 Statewide Housing Plan²⁹ outlines six policy priorities that focuses OHCS's investments to ensure all Oregonians have the opportunity to pursue prosperity and live free from poverty. These priorities are:

- Equity and Racial Justice
- Homelessness
- Permanent Supportive Housing
- Affordable Rental Housing
- Homeownership
- Rural Communities

One of the six core priorities is to advance equity and racial justice by identifying and addressing institutional and systemic barriers that have created and perpetuated patterns of disparity in housing and economic prosperity.

²⁸ OHCS, Housing Stability Council, Bylaws, <https://www.oregon.gov/ohcs/hsc/Pages/index.aspx>

²⁹ OHCS, Statewide Housing Plan: 2019–2023, <https://www.oregon.gov/ohcs/pages/oregon-state-wide-housing-plan.aspx>

To meet this priority, OHCS has developed implementation strategies, which rely on quantitative and qualitative data. The applicable implementation strategies that OHCS will use for the design, outreach, engagement, and implementation of its CDBG-DR programs are described below.

- Adopt an approach to advancing equity and racial justice, informed by national promising practices and lived experience of communities of color
- Create and maintain a system to analyze OHCS programs and practices and remove identified barriers to access and opportunity within OHCS programs to ensure equitable outcomes
- Improve OHCS's ability to track, analyze, and measure performance and progress towards equity goals through standardization of data collection and enhancing data analysis of program utilization
- Meaningfully engage culturally specific and culturally responsive organizations and their constituents to ensure OHCS policies, practices, systems of accountability, and program awards are designed to advance equity and racial justice and meet the needs of communities of color, including black, indigenous, and people of color
- Fund housing and community services programs to build inclusive communities and prevent, mitigate, or reverse the effects of gentrification and displacement
- Increase access to fair housing resources, education, and enforcement to reduce the occurrence and impact of housing discrimination in Oregon
- Strengthen relationships with tribal leaders and leverage resources to address disparities in tribal housing issues

3.2.7.2.1.3 Targeted Universalism, Racial Equity Analysis Tool (REAT) and Equity Lab

OHCS will apply a targeted universalism approach to designing and implementing CDBG-DR programs. Within a targeted universalism framework, universal goals are established for all groups concerned. The framework then uses targeted processes and strategies to achieve those goals, based upon how different groups are situated within structures, culture, and across geographies to obtain the universal goal. Targeted universalism is a platform to operationalize programs that move all groups toward the universal policy goal, as well as a way of communicating and publicly marketing such programs in an inclusive, bridging manner. It is an approach that supports the needs of particular groups, including those in the majority, while reminding everyone that we are all part of the same social and civic fabric.³⁰ Through this process, the State will develop specific solutions to address unmet

³⁰ Targeted Universalism, Policy and Practice, May 2019, <https://belonging.berkeley.edu/targeted-universalism>

needs, incorporating those solutions into a universal goal-oriented framework to equitably benefit all groups involved.

As an example, the State may set a universal goal for the Homeowner Assistance and Reconstruction Program to ensure all homeowners at or below 80% AMI move into an affordable and secure home. This goal will account for other resources and programs available to LMI households. The targeted strategies will account for the culturally specific needs of different protected class groups, vulnerable populations, and underserved communities. The strategies will include an analysis of historic and current barriers to disaster recovery resources and will incorporate solutions to address these barriers. Some examples of targeted processes and strategies for Latine households and individuals living with disabilities are included below:

- Targeted strategies for addressing the recovery needs of disaster-impacted Latine survivors include providing additional application support, legal services, language translation and interpretation services, support managing licensed and insured construction contractors, time constraints, access to additional funding, providing access to housing that meets the needs of multi-generational households, and the need to work with trusted community organizations due to a distrust of government.
- Targeted strategies for addressing the recovery needs of disaster-impacted individuals living with disabilities include providing additional application support, access to housing that is designed to be accessible for their needs, legal services to support power of attorney accommodations, ensuring housing application intake centers are accessible, ensuring the CDBG-DR website is Section 508 compliant.

The State will publish program universal goals and targeted strategies on its final Action Plan that will be submitted to HUD. OHCS will leverage feedback received from public comments, the expertise of internal data and reporting team staff, partnerships with local organizations, and the OHCS Racial Equity Ad Hoc Workgroup. This Workgroup is in the process of finalizing a customized Racial Equity Analysis Tool (REAT) and Equity Lab for the agency. In addition to helping inform the targeted universal goals and strategies, the Racial Equity Analysis Tool and the Equity Lab workshop process will be used to support thought-partnership, answer questions, and review programs to ensure they are serving communities of color effectively.

Under the targeted universalism framework, OHCS will develop strategies that operationalize equity, direct resources and achieve outcomes for those most impacted by housing instability as a result of the 2020 Wildfires. Some of the additional needs that may

be specific or more prevalent amongst different protected classes, vulnerable populations, and/or underserved communities are described in the sections below.

3.2.7.2.2 Individuals Living with Disabilities

FEMA reported that nearly 18% of the valid FEMA IA registrants self-reported having access or functional needs. Through the course of development of the FEMA Disaster Sheltering and Housing Strategy for DR-4562,³¹ FEMA and OEM identified significant challenges in addressing affordable and accessible recovery needs for people with disabilities.

- **Issue No. 1: Affordability and Accessibility.** For renters and homeowners living with a disability, accessibility is of the utmost importance when searching for a new home. No matter how appealing the price or location, a home is not suitable unless it accommodates the physical needs of its tenants. This also includes access to community services and supports, such as public transportation and paratransit services. These additional requirements often limit a resident's ability to identify lower-cost housing.
- **Issue No. 2: Accessible Housing Is Not Only Utilized by Households That Require Resources.** Accessible homes are undersupplied, even if we assume that they are routinely occupied by households that have a disability. In reality, the situation is made worse by the fact that accessible homes and individuals with disabilities are rarely paired together. An individual without a disability will not turn down an attractive housing option just because it has accessible features. Alternatively, someone who develops a physical disability may prefer to continue living in their non-accessible home rather than go through the process of moving.
- **Issue No. 3: Awareness of Programmatic Waivers and Impacts on People with Disabilities.** During a disaster, organizations, including HUD, will issue waivers of certain requirements in their programs to support the speedy recovery of disaster survivors. These program flexibilities may free up funding to be utilized for different purposes, may increase the amount of money that can be spent on certain types of assistance, or might create programmatic flexibilities to speed up the process. While these waivers are typically good for survivors because they may make more housing available, some waivers can be detrimental to survivors with disabilities. For example, HUD has issued a waiver to HOME property standards, which appeared to waive the Americans with Disabilities Act and the Rehabilitation Act. Disability integration can advise what waivers exist and how they positively or negatively affect the response and recovery of people with disabilities.

³¹ FEMA, DR-4562-OR: Disaster Sheltering and Housing Strategy, <https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/FEMA-Disaster-Sheltering-Housing-Strategy-DR4562.pdf>

- **Issue No. 4: Including Disability Access in Hazard Mitigation Strategies.**

Accessible elevation can be a barrier for people with mobility disabilities and older adults who are aging in place. Elevated homes can disrupt community visitability and can be daunting for individuals who need zero-step entry and egress.

Per ORS 456.510, OHCS-funded rental housing programs must follow visitability requirements. With certain exceptions, OHCS subsidized rental housing for new single-family or duplex dwelling with habitable space on the first floor must be designed and constructed as “visitable” dwelling: <https://www.oregonlaws.org/ors/456.510>. The State will adopt this standard in the reconstruction or new construction of all site-built housing funded with CDBG-DR assistance. This is in addition to ensuring all multi-family housing subsidized with CDBG-DR assistance meet ADA and accessibility requirements.

By adopting this standard across its programs, the State will help increase the availability of accessible housing to meet current and future needs of older adults and people living with disabilities. This will increase the opportunity for households to age in place and build in increased community resiliency for individuals with disabilities.

3.2.7.2.3 Latine Individuals and Households

3.2.7.2.3.1 Impediments

The State has identified wildfire impacts and recovery barriers for Latine communities as a special area of need and focus. In addition to barriers to homeownership described under the Analysis of Impediments to Fair Housing Choice, the 2016 Latinos in Oregon: Trends and Opportunities in a Changing State³² identifies additional barriers faced by Latine individuals and households in Oregon:

- While more Latine students are graduating, the achievement gap between Latine and white students starts early and persists.
- Latine Oregonians are essential to the state’s economy, but are still at an economic disadvantage compared to white Oregonians.
- While Latine health status is improving in some areas, disparities still exist for health access and outcomes. Housing is a critical social determinant of health.

3.2.7.2.3.2 Oregon’s Growing Latine Workforce and Continued Economic Disadvantage

According to the Oregon Employment Department, Oregon’s Latine population has a higher labor force participation rate and Latine are employed at higher rates than whites who are not Hispanic. While Latine Oregonians are participating in the labor force at

³² The Oregon Community Foundation, Latinos in Oregon: Trends and Opportunities in a Changing State, August 2016, https://www.ode.state.or.us/wma/ydd/2015-17/latinos_in_oregon_report_aug-2016.pdf, pages 2-3

higher rates than are their white counterparts, stark discrepancies exist in income and poverty between the two groups. In 2014, according to American Community Survey five-year estimates, white Oregonians have a median household income of \$51,397 and Latine Oregonians have a median household income of \$39,723. When reviewing the per capita income, white Oregonians' per capita income of \$28,690 is more than double Latine Oregonians' per capita income of \$13,740.³³

It is important to highlight that Oregon's Latine population is young, diverse and growing due to an increase in the number of US-born Latine Oregonians.³⁴ While many Latine individuals and households or their ancestors may have come to Oregon as seasonal or migrant workers, not all Latine individuals or households who were impacted by the wildfires are currently seasonal or migrant workers, but are working across industries within the impacted areas, including but not limited to service occupations, construction and maintenance, production and transportation, sales and office occupations, and management, science and arts. In the areas impacted by the Almeda Fire, according to the results of the survey conducted by Unete in 2021, the majority of those Latine survivors worked in agriculture, hospitality, and landscaping.³⁵

The Oregon Health Authority's Estimate of Migrant and Seasonal Farmworkers in Agriculture, 2018 Update, estimates that 174,000 migrant and seasonal farmworkers and their families play a vital role in the State's economy. It is estimated that more than 55,000 migrant and seasonal farmworkers and their families reside within the seven HUD-identified MID counties. Farm workers have long been excluded from certain protective labor laws in Oregon, such as child and overtime labor laws, though there are various legislative efforts underway in Oregon to address these inequities that are rooted in racism and exclusion. Table 28 provides a breakdown of migrant/seasonal households by impacted county.

³³ Ibid, page 18.

³⁴ Ibid, page 2.

³⁵ Unete (Center for Farm Worker and Immigrant Advocacy), Almeda Housing Survey 2021, https://www.canva.com/design/DAExaPiwXT8/fxlcQhZ0eyOysmz950zPIA/view?utm_content=DAExaPiwXT8&utm_campaign=designshare&utm_medium=link&utm_source=shareyourdesignpanel#1

Table 28: 2020 Wildfire-Impacted County Migrant and Seasonal Household Members

County	Total Migrant, Seasonal Farmworkers, and Household Members (estimates)
Clackamas	12,296
Douglas	2,624
Jackson	6,567
Lane	2,899
Lincoln	131
Linn	4,233
Marion	26,673

This discrepancy in income and a history of exclusionary labor policies pose significant potential barriers to obtaining resources needed to recover from the wildfires.

3.2.7.2.3.3 Survey of Disaster Impacted Latine Households

There are no comprehensive datasets identifying the number of Latine individuals who were impacted by the wildfires. However, different community based organizations have conducted surveys of impacted residents, which are helpful for understanding the experiences of many Latine survivors.

CASA of Oregon and the NOWIA Unete Center for Farm Worker Advocacy conducted a stakeholder outreach survey of Latine community members impacted by the Almeda Fire (Jackson County).³⁶ At the onset of the fires, NOWIA Unete supported more than 600 families by fulfilling basic needs, including food, clothing, hotel rooms, and distance learning support for students. They are continuing to support more than 300 families with hot meals, food vouchers, and food staples/hygiene products, in addition to advocacy and educational services. NOWIA Unete started surveying survivors in mid-April 2021 to offer a clearer picture of the needs of the Latine farm worker and immigrant community they represent. Through this survey, 151 families were interviewed, which included the following:

- 34 single-parent households
- An average family size of 3.2 members
- 30 people who identified as having a disability

³⁶ Unete (Center for Farm Worker and Immigrant Advocacy), Almeda Housing Survey 2021, https://www.canva.com/design/DAExaPiwXT8/fxlcQhZ0eyOysmz950zPIA/view?utm_content=DAExaPiwXT8&utm_campaign=designshare&utm_medium=link&utm_source=shareyourdesignpanel#1

- 5% older than age 62
- 24% younger than age 12
- 89% of a race and ethnicity other than white or non-Hispanic
- 89% whose primary or only language is Spanish

Of the people surveyed, more than 50% indicated that they have lived in the valley for more than 20 years and, as such, have established roots and are anxious to return to the communities they helped establish. The results also showed that before the 2020 Wildfires, 55% of the families were paying between \$400 and \$600 per month for rental housing. In addition, the results show that 40.5% of the surveyed respondents can comfortably afford housing payments between \$300 and \$600, 31% between \$600 and \$800, and 19% between \$800 and \$1,000. The survey also gathered information on pre-fire living arrangements, which yielded the following results:

- 57% lived in a manufactured home
- 21% lived in an apartment/other rental housing
- 18% lived in RVs
- 4% lived in other living arrangements

The respondents also provided information on their current living arrangements, which are as follows:

- 5% had no reliable housing
- 8% had temporary housing through FEMA
- 15% had RVs
- 8% lived in hotels
- 20% lived in apartments
- 21% lived in a rented house
- 7% owned a house
- 6% lived in a trailer
- 10% lived in other living arrangements

While this information includes a limited population, it does help OHCS in the design of their programs, their outreach and engagement strategies, and in how programs are carried out to ensure that the diverse needs of wildfire survivors are met. For example, OHCS is partnering and engaging with CASA of Oregon, community action agencies, long-term recovery groups, and other community-based organizations to gather additional information and to ensure that program design, engagement, outreach, and program

marketing strategies are inclusive and address the needs of those who have been marginalized from the programs offered to date.

3.2.7.2.4 Impacts on Individuals and Households Experiencing Homelessness

Homelessness is a long-standing challenge facing Oregon that has been exacerbated by COVID-19. According to the Oregon Statewide Shelter Study (August 2019),³⁷ Oregon has one of the highest homelessness rates in the country, with 50 or more persons experiencing homelessness per 10,000 population, and an estimated need of more than 5,800 shelter beds for both families with children and individuals experiencing homelessness. The study found a particular need among certain groups, including people of color, undocumented non-citizens, youth, and LGBTQ+ individuals.

Per the Oregon Community Foundation's March 2019 report on Homelessness in Oregon, while Oregon's population represents 1.3% of the total U.S. population, Oregon's homeless population represents 2.6% of the total U.S. homeless population. In addition, the report suggests that the State's homelessness and housing dilemmas are the result of two converging crises—an inadequate housing supply and rising rents that are leaving tens of thousands of children and families in Oregon at risk of becoming homeless, and the persistence of a smaller population of chronically homeless people in need of intensive social services and specialized housing.³⁸ Oregon's long-standing housing crisis meant that wildfire and other natural disaster survivors with the fewest resources could not find a place to relocate, resulting in an increased need for non-congregate sheltering after the wildfires and challenges in providing intermediate and permanent housing solutions for wildfire survivors experiencing, or at risk of experiencing, homelessness.

Estimating the number of homeless individuals was more difficult in 2021, as COVID-19 upended routines, reduced staffing and resources, and presented unexpected complications. At the same time, COVID-19 caused economic disruption and the most sudden and severe contraction in the U.S. economy in decades, resulting in millions of individuals and households losing their jobs. Many formerly stable households found themselves facing food shortages and the loss of their homes. While government and the nonprofit sector addressed some of these hardships, the scale of the problem made it difficult to help everyone.

³⁷ OHCS Statewide Shelter Study (August 2019), <https://www.oregon.gov/ohcs/about-us/Documents/poverty/Oregon-Statewide-Shelter-Study.pdf>

³⁸ Oregon Community Foundation, Homelessness in Oregon (March 2019), <https://oregoncf.org/community-impact/research/homelessness-in-oregon/>

There were many reasons to believe that the size and composition of the population of people experiencing homelessness may have changed in 2021; however, COVID-19 made it harder to isolate the impacts from the 2020 Wildfires and the impacts from COVID-19. The table below compares the 2019 point-in-time (PIT) count with the 2021 (sheltered and unsheltered) PIT count. All eight wildfire-impacted counties experienced increases in homelessness from 2019 to 2021, with the largest increases in Marion (250) and Clackamas (247) counties.

Table 29: Point-in-Time by County

County	2019 Homelessness PIT	2021 Homelessness PIT	Increase From 2019 to 2021
Clackamas	419	666	247
Douglas	542	594	52
Jackson	712	831	119
Klamath	207	421	214
Lane	2,165	2,379	214
Lincoln	260	283	23
Linn	277	380	103
Marion	974	1224	250
Total	5,556	6,778	1,222

Source: Oregon Statewide Homelessness Estimates 2021 Report

OHCS obtained certain available usage data from its State Homeless Assistance Program (SHAP) to demonstrate quantitative impacts (as expressed by the number of households served) on SHAP-funded homelessness services. However, these data do not necessarily represent only wildfire-related impacts:

- Lane County saw an overall increase from 1,132 households served in July–August 2020, to 1,677 households served in September–October 2020, to 2,412 households served in December 2020 – January 2021. Of the households served, 89% were childless adults.
- Marion County saw an overall increase from 742 households served in July–August 2020, to 971 households served in September–October 2020, to 1,107 households served in December 2020 – January 2021. More than 80% of the households served were childless adults.

- Jackson County saw a slight decrease from 206 to 194 in the number of households served from July–August to September–October 2020, followed by an overall increase to 253 served in December 2020 – January 2021. Of the households served, 80% were childless adults.

Oregon state and US federal legislatures allocated hundreds of millions of dollars for COVID-19 recovery in Oregon, specifically to be used for homelessness sheltering, supports and prevention, including through state emergency board funds, state house bills, the US Treasury Emergency Rental Assistance Program and Homeowner Assistance Fund, HUD HOME-CV, and HUD ESG-CV.

3.2.7.2.5 Rural Housing Challenges

Oregon's pre-disaster housing stock was concentrated near metropolitan areas. This is because Oregon is one of the few states that has established urban growth boundaries (UGB),^{38F39} which promote growth in urban zones while also restricting residential development of rural farm and forest land. Thus, the low level of pre-disaster housing stock in rural areas has made community housing stock especially vulnerable to natural hazards, such as wildfires, flooding, and landslides. This, in combination with the shortage of labor and construction supplies, has added to the challenges faced by rural communities in rebuilding and replacing destroyed housing.

Throughout the public comment period, there were multiple comments from local government officials and impacted residents that the lack of available land in rural areas has made it difficult for households to recover. This challenge is particularly acute for homeowners of manufactured homes who were living on leased land when that land is no longer available or no longer affordable due to escalating manufactured housing park rental costs, the lack of land, and/or skyrocketing costs of acquiring land in the impacted rural areas.

These challenges are addressed in the State's CDBG-DR program design by considering current labor and supply costs and shortages when calculating awards and determining cost reasonableness. The State will work with residents and local governments to ensure homes are built in line with UGB requirements, and to standards that make them more energy efficient and resilient to the spectrum of natural hazards faced in the rural impacted areas – not just wildfires. The State will allow for the repair or replacement of damaged private infrastructure - such as septic tanks and wells - in its housing programs.

³⁹ Oregon Department of Land Conservation and Development, Urban Planning, <https://www.oregon.gov/lcd/UP/Pages/Urban-Planning.aspx>

3.2.7.2.6 Racially or Ethnically Concentrated Areas of Poverty

HUD defines Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) as an area where there is a significant number of racial and/or ethnic minorities living in poverty. HUD has developed a census tract-based definition of R/ECAPs.⁴⁰ The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. HUD uses a definition of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line.⁴¹ Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

According to the HUD R/ECAP mapping tool, there is one R/ECAP area in the MID area, in Marion County (see Figure 3, below). However, the R/ECAP census tract is outside of the burn scar areas within Marion County. Additionally, Figure 4 is a racial dot density map of the MID areas. Due to the small population size of the MID communities within the burn scar areas, the dot density maps do not communicate significant data for communities within the burn scar area.

⁴⁰ HUD, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), 2018. <https://www.arcgis.com/home/item.html?id=56de4edea8264fe5a344da9811ef5d6e>

Figure 3. R/ECAP Areas, MID Counties

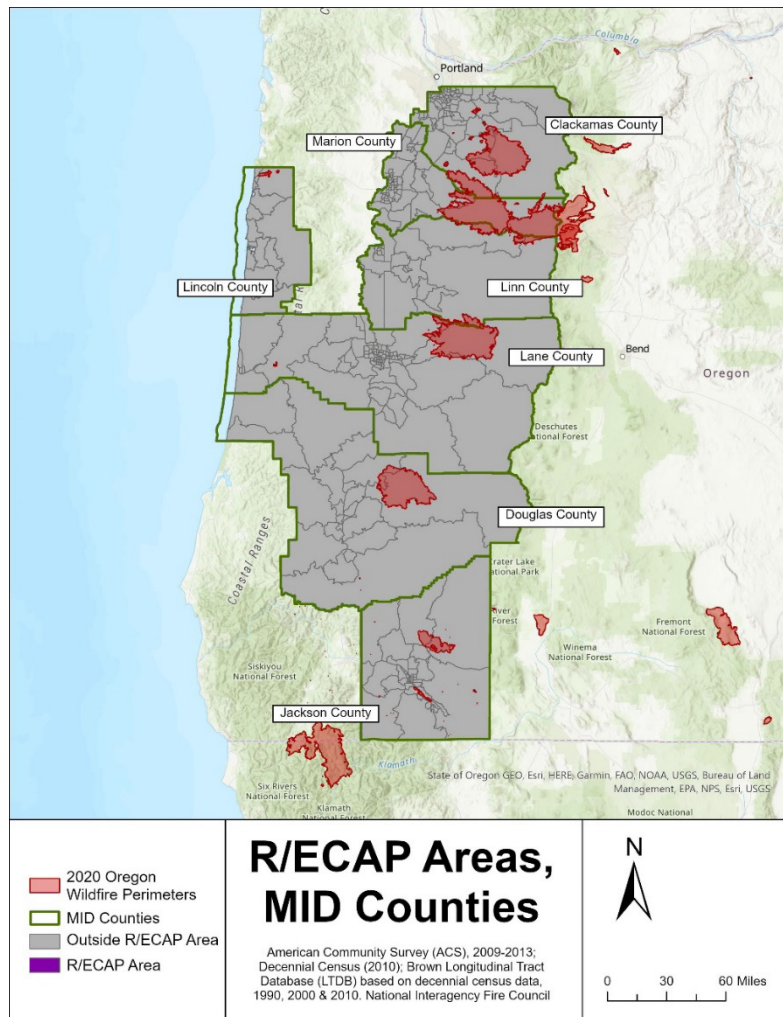


Figure 4. Race and Ethnicity Dot Density, MID Counties

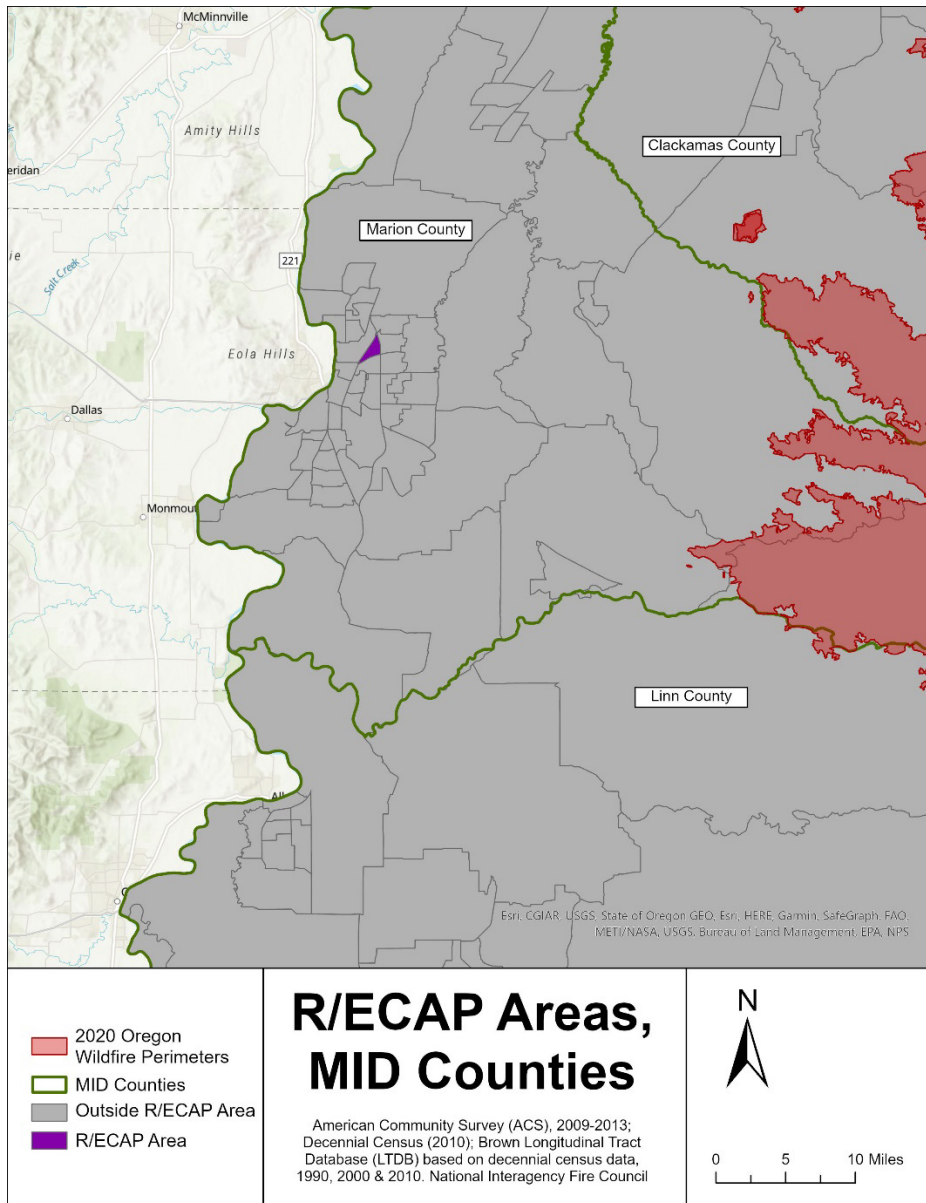
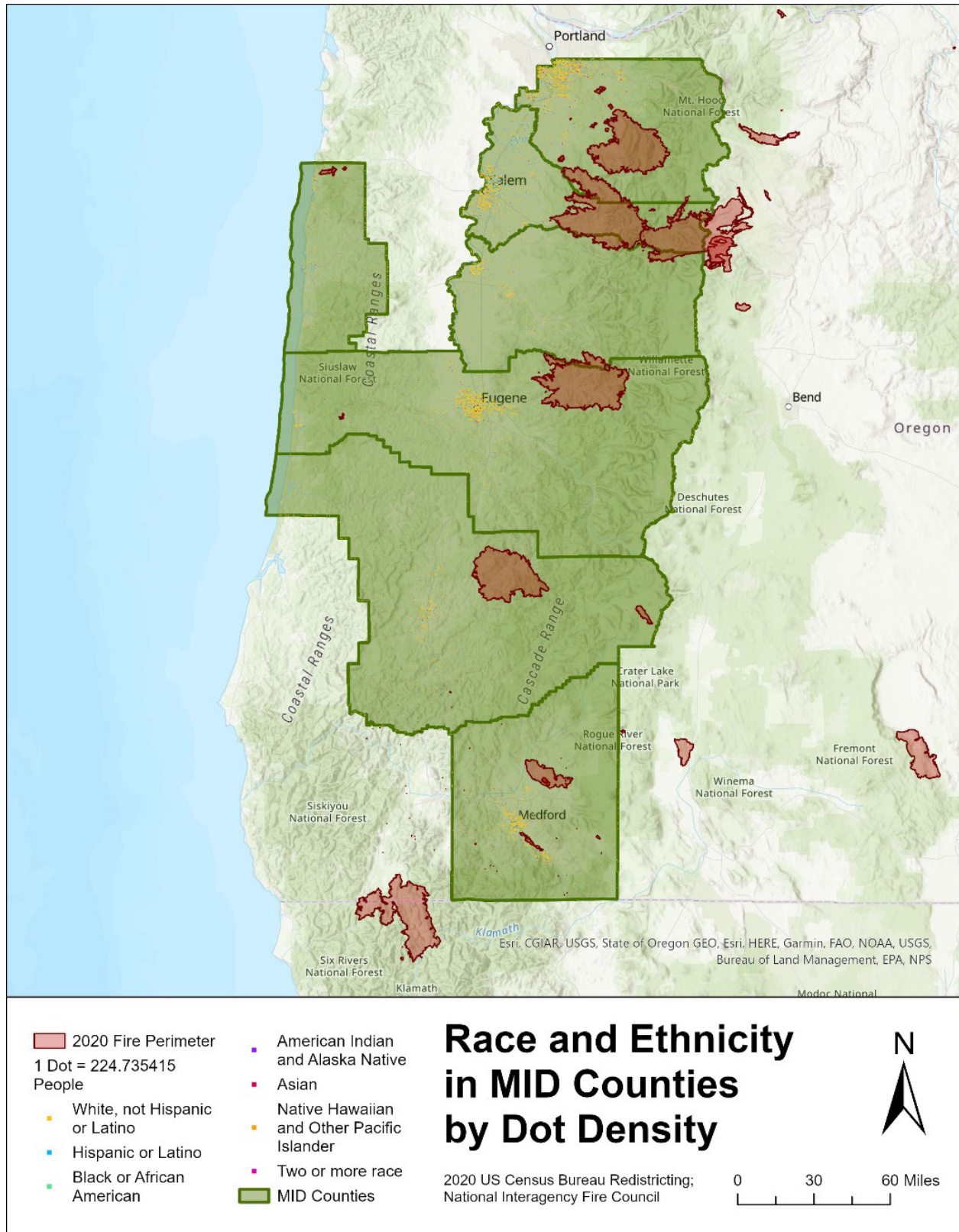


Figure 5. Race and Ethnicity in MID Counties by Dot Density



3.2.7.2.7 Underserved Communities

The State has mapped the burn scar areas from the 2020 Wildfires with the geographic boundaries of Tribal Areas and Opportunity Zones in Figures 6 through 9 below. These maps identify those areas that HUD has identified as underserved communities at the census tract level (Opportunity Zones) and on the Tribal Area scale. Due to the rural and diverse nature of the impacts from the 2020 Wildfires, OHCS also will use more refined and focused data analysis, mapping, and community data gathered through the Action Plan and the program design stakeholder consultation process to understand which neighborhoods and communities have been historically underserved. The State will also review other information that may indicate whether a community is underserved, including those census tracts that were eligible for opportunity zone designation and areas eligible for New Market Tax Credits.

Figure 6: Map of Burn Scar, Tribal Boundaries, and Opportunity Zones in Jackson County

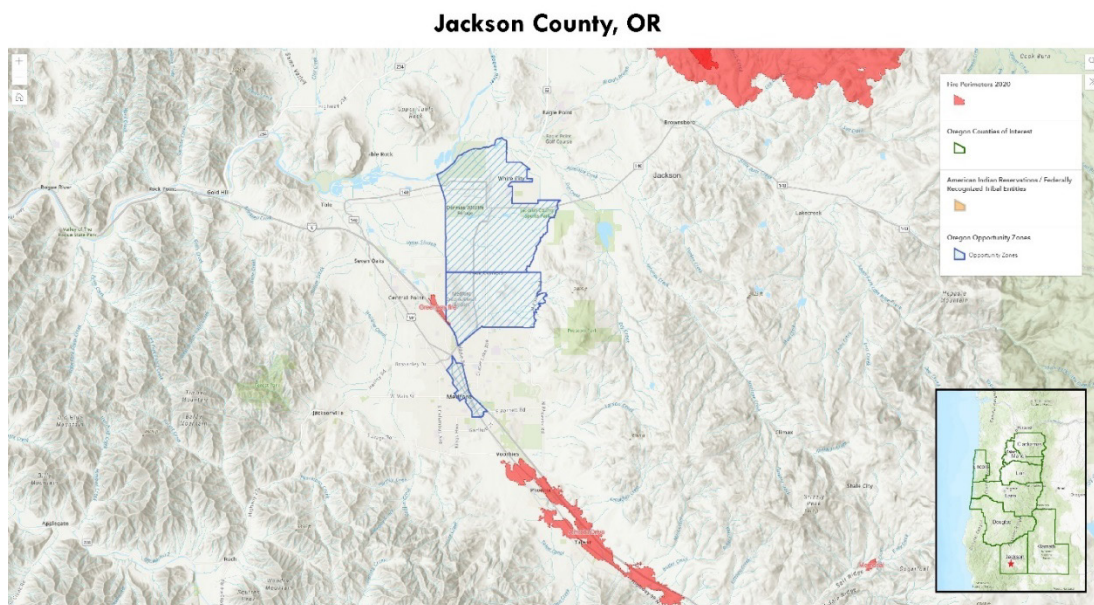


Figure 8: Map of Burn Scar, Tribal Boundaries, and Opportunity Zones in Marion County

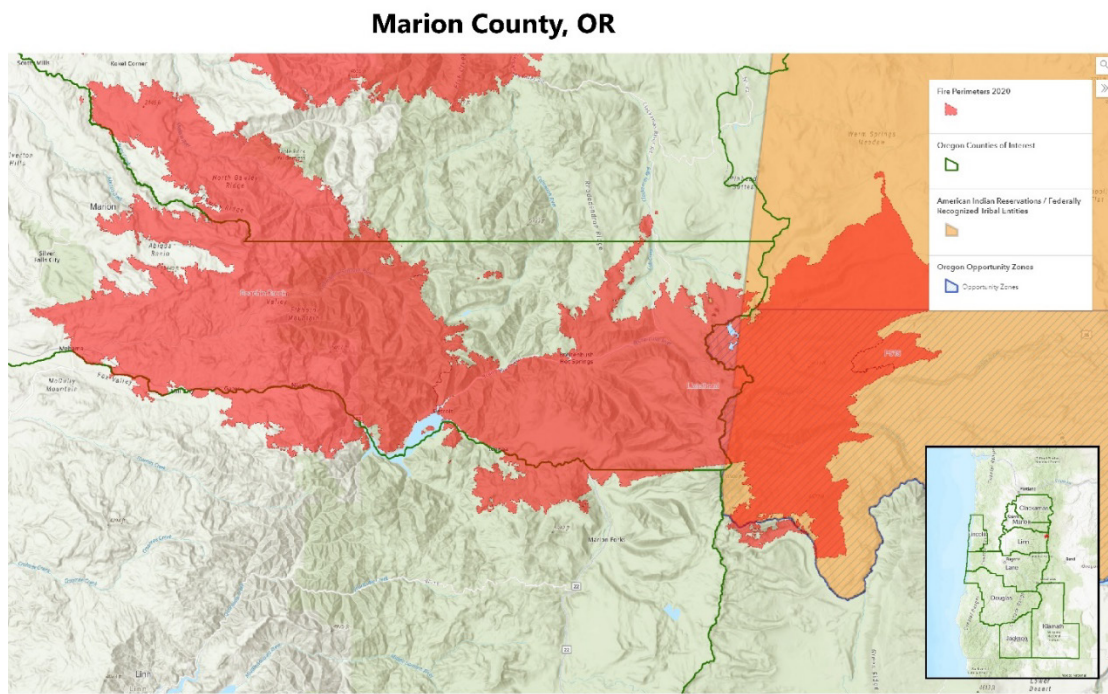
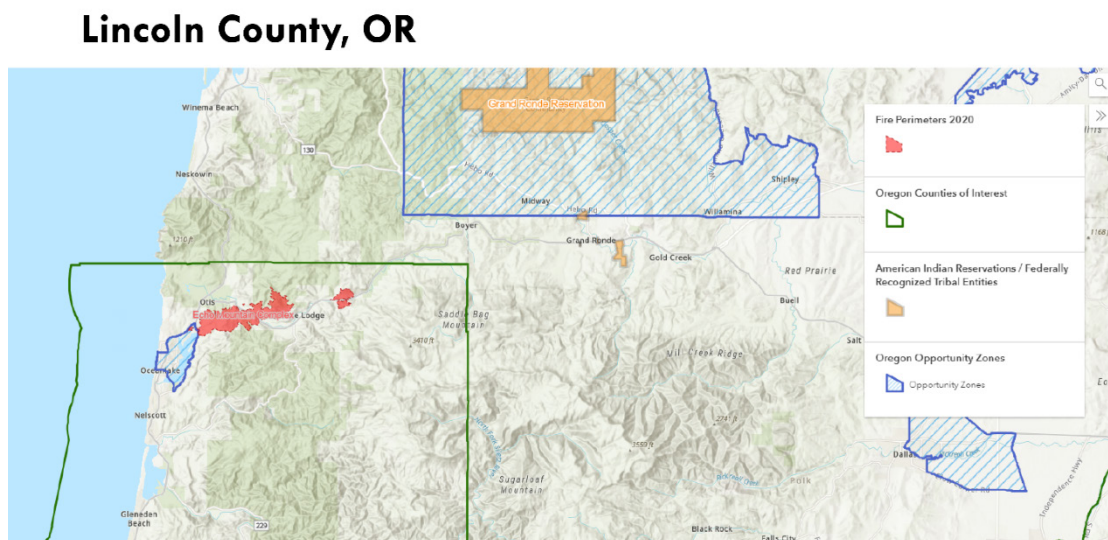


Figure 9: Map of Burn Scar, Tribal Boundaries, and Opportunity Zones in Lincoln County



3.2.7.2.7.1 Tribal Areas

Tribal lands representing four American Indian Tribes are located within the impacted areas. They are the Coquille Tribe, Cow Creek Band of Umpqua Tribe of Indians, the Klamath Tribes, and the Confederated Tribes of Siletz Indians.⁴²

None of these four tribes in and/or near the wildfire impact areas have large reservations or tracts of native-owned lands, or housing that sustained damage by the wildfires. Rather, their enrolled tribal members live throughout the State and nationally.

- The Coquille Indian Tribe, located on the southern Oregon coast, near Coos Bay in Coos County, has 1,100 enrolled tribal members. The Coquille Indian Tribe has a 10,000-acre tribal land base.
- The Cow Creek Band of the Umpqua Tribe of Indians, located in southwestern Oregon in Roseburg, has 1,800 members. The Cow Creek Band of Umpqua Tribe of Indians does not have reservation lands.
- The Klamath Tribes include the Klamath, Modoc, and Yahooskin Tribes and are in the Klamath Basin, in southcentral Oregon, with a population of approximately 5,400.
- The Confederated Tribes of Siletz Indians consist of 27 individual tribes in the Willamette and Umpqua Valleys in central western Oregon, with an enrolled population of 4,084 members. The Siletz Tribes own a 5.8-square mile reservation in Lincoln County.
- The Confederated Tribes of the Warm Springs included elements of the Warm Springs, Wasco, and Paiute Tribes. The Tribe has over 5,000 members and a 1,019 sq. mile reservation in north-central Oregon. The reservation was directly impacted by the 2020 Lionshead Fire. Almost 100,000 acres of timber lands on the reservation were impacted, but no structures were lost.

American Indian/Alaska Native tribal members from outside of Oregon also reside in and were impacted in the declared counties. Some of these tribal members evacuated during the wildfire and returned to their reservations or tribal areas where they were provided with shelter and services, some doubled up with other tribal members, and some relied on the American Red Cross and State non-congregate sheltering resources (reports received from the HUD Northwest Office of Native American Programs and FEMA Tribal Liaison) for sheltering and food needs.

⁴² DR-4562-OR: Housing Impact Assessment, [https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20\(FINAL%202021-04-30\).pdf](https://www.oregon.gov/ohcs/get-involved/Documents/committees/ODHTF/05-03-2021-DR-4562-OR%20Assessment%20(FINAL%202021-04-30).pdf), p. 29-30

This is significant when it comes to resources as there may be additional potential resources for Tribal members seeking disaster assistance, although these funding sources may have been insufficient to meet long-term recovery unmet needs.

3.2.7.2.7.2 Opportunity Zones

Opportunity Zones were created under the Tax Cuts and Jobs Act of 2017. They are low-income communities and certain neighboring areas, defined by population census tract, that were nominated by states for the designation, then certified by the U.S. Department of the Treasury. Their purpose is to spur economic growth and job creation in low-income communities while providing tax benefits to investors.⁴³ As demonstrated in the maps above, the 2020 Wildfire-impacted areas that are either within or border Opportunity Zones fall in the following counties:

- Jackson County
- Klamath County
- Lincoln County
- Marion County

3.2.7.2.7.3 Social Vulnerability Index and Disadvantaged Communities

In 2021, President Joe Biden signed Executive Order 14008, Tackling the Climate Crisis at Home and Abroad. The Executive Order states that “40 percent of the overall benefits” of federal investments from covered programs should flow to disadvantaged communities.⁴⁴ This is to ensure that any federal funds directed toward climate mitigation and adaptation largely benefit historically underserved communities. One of the ways that agencies and covered programs benefit disadvantaged communities is by identifying target populations with the Centers for Disease Control and Prevention’s (CDC) Social Vulnerability Index.

The CDC’s Agency for Toxic Substances and Disease Registry’s (ATSDR) Social Vulnerability Index (SVI) ranks counties and census tracts on 15 social factors, including unemployment, minority status, and disability, and then further groups them into four related themes. The SVI ranking variables for the four themes include Socioeconomic Status, Household Composition & Disability, Minority Status & Language, and Housing Type & Transportation. These indicators help support analysis on the relative vulnerability of a given census tract and help identify communities that will need continued support to recover following an emergency or natural disaster. The attached map shows the overall ranking (RPL_Themes),

⁴³ IRS, Opportunity Zones, <https://www.irs.gov/credits-deductions/businesses/opportunity-zones>

⁴⁴ Office of Management and Budget, Implementation Guidance for the Justice40 Initiative, <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>

which is a percentile ranking that represents the proportion of tracts that are equal to or lower than a tract of interest in terms of social vulnerability. For example, a CDC/ATSDR SVI ranking of 0.60 signifies that 60% of tracts in the State or nation are less vulnerable than the tract of interest and 40% of tracts in the State or nation are more vulnerable.

Both Klamath and Marion counties have an SVI percentile of more than 0.8 (0.91 and 0.88, respectively), indicating that their populations are more vulnerable than 80% of other counties in the United States. In addition, Jackson, Douglas, Lane, and Linn counties all have an SVI percentile above 0.5 (0.71, 0.68, 0.54, and 0.57, respectively).

At the finer level of detail provided by the census tract map, it is clear that the 242 Fire (Klamath County), Alameda Fire (Jackson County), and Archie Creek Fire (Douglas County) took place in census tracts with high SVI.

Figure 10: Overall Social Vulnerability Index Percentile in Oregon Counties

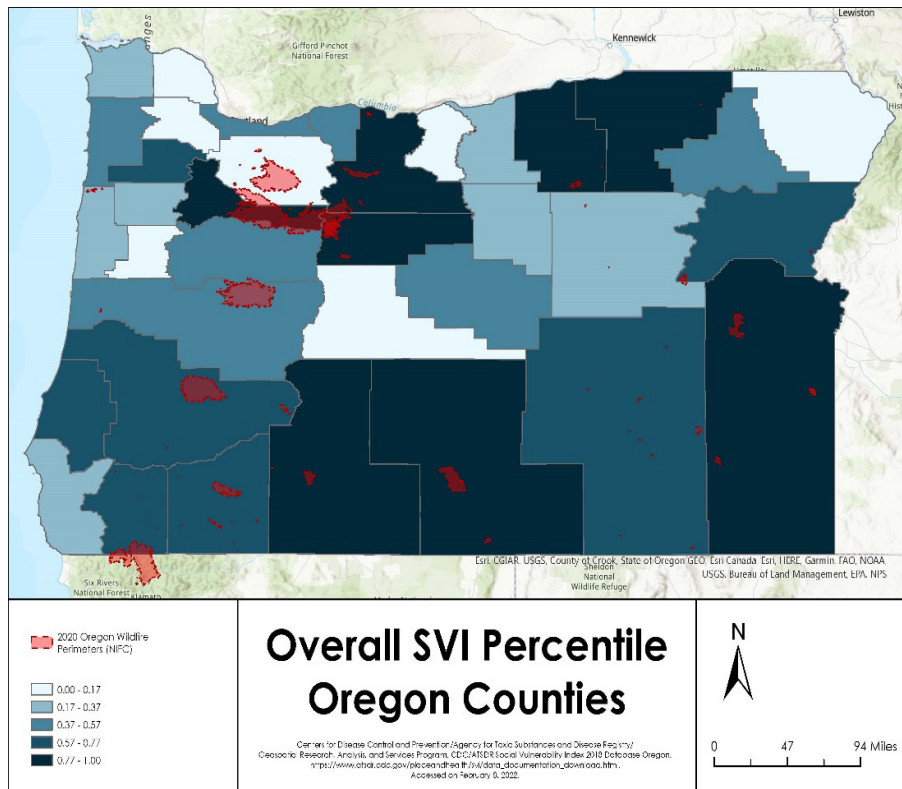
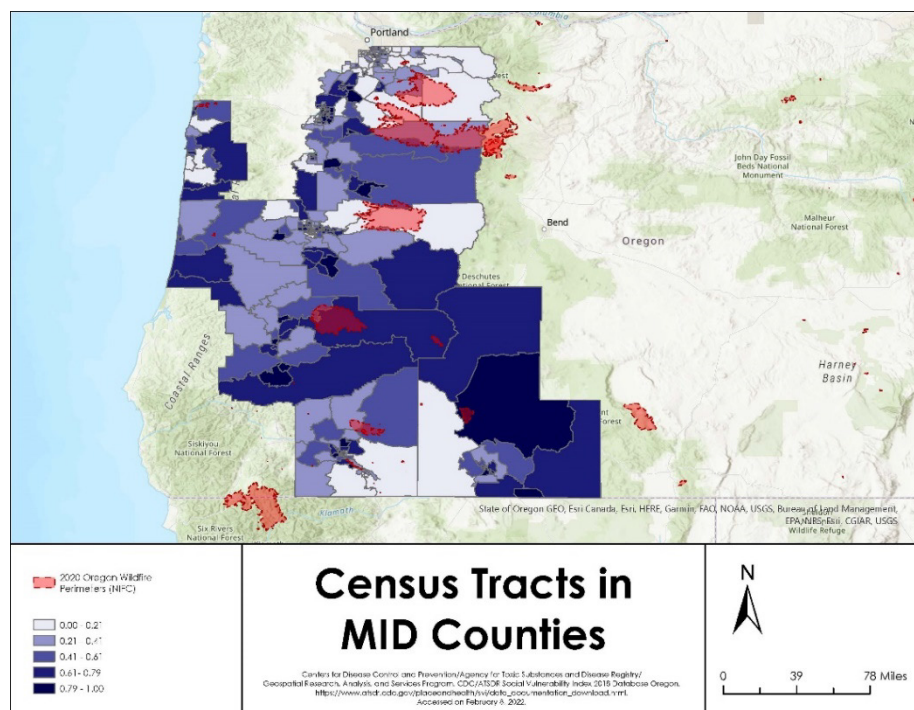


Figure 11: Social Vulnerability Index Percentile by Census Tract and Burn Scar Areas



3.2.7.2.8 Coordination and Engagement

There have been multiple regional, local, and statewide planning efforts undertaken prior to and since the 2020 Wildfires that either directly or indirectly inform the State's recovery to date and which serve as the foundation for the CDBG-DR Public Action Plan. Through the data analysis carried out in the Unmet and Mitigation Needs Assessments and drawing from the planning and strategy coordination described below, the State has outlined the following guiding principles for CDBG-DR program decision making. The State of Oregon is committed to the following:

- Advancing equity and racial justice and supporting vulnerable populations and underserved communities.
- Rebuilding homes and communities so that they are more resilient to current and projected hazards.

3.2.7.2.8.1 Oregon's Commitment to Increased and Ongoing Coordination and Engagement to Provide Equal Opportunities for Disaster Assistance

OHCS is working closely with various local organizations, including local elected officials, recovery groups, community action agencies and culturally specific organizations and community-based organizations. OHCS and other state agencies have been collecting information from local partners since the early days of the recovery, and there are many

themes that have emerged from those working with individuals with lived disaster experiences.

- Across the impacted areas, there are many residents who were living in less traditional housing situations who have not yet been able to access recovery assistance. This has been a particular barrier for the Latine community. This includes individuals and households living in recreational vehicles, multi-generational families living on a single-property, living in sheds on rural properties, and/or other doubled-up situations.
- Rural communities that were impacted were already facing a significant housing crisis and the relative loss of housing to the pre-disaster housing stock has devastated many communities. Many communities are concerned their residents will not return because the town has been destroyed, due to lack of housing, lack of employment opportunities, and/or because they have resettled elsewhere.
- Local and private infrastructure that was there before the disaster was outdated and needs to be replaced with infrastructure that meets code and accommodates rebuilding affordable and resilient housing
- Land availability and costs are some of the biggest barriers to recovering in a manner that is affordable, particularly in Southern Oregon
- There is insufficient affordable housing stock available for people to rent while they work to complete their recovery
- Many homeowners continue to struggle with receiving assistance from their insurance companies for eligible damages
- Most homeowners – including site-built and manufactured homeowners – were underinsured, if they had any homeowner’s insurance

As described in the program sections of this Action Plan, OHCS will ensure its CDBG-DR programs are designed to address the diverse and unique needs faced by different communities across the 2020 Wildfires.

3.2.7.2.8.2 Regional Housing Needs Assessment

Oregon’s State legislature passed House Bill (HB) 2003 in 2019, establishing a transformative approach to planning and programming to resolve the ongoing affordable housing crisis. A portion of HB 2003 directed OHCS to create a methodology to conduct Oregon’s first statewide Regional Housing Needs Analysis (RHNA). The goal of the report was to standardize a housing forecasting methodology so that cities could have a clearer image of the affordable housing production goals that they need to meet. This would ensure that cities could take responsibility for contributing to statewide housing goals. After OHCS developed the initial report, DLCD was tasked with reviewing the RHNA to

determine whether the RHNA provides a realistic affordable housing goal for Oregon's regions. DLCD reviewed the report and strongly recommended that the State legislature adopt the RHNA and task OHCS and DLCD to begin its implementation and use.⁴⁵ On March 1, 2021, OHCS submitted and presented their report to the State legislature along with DLCD's assessment.

Key takeaways from OHCS's RHNA methodology include the following:

- Over the next 20 years, Oregon will need to build about 584,00 new homes.⁴⁶
 - This means that Oregon's developers will need to build 30,000 to 40,000 units every year.
 - The Portland metropolitan area, Deschutes County, and the Willamette Valley will experience the greatest amount of production pressure.
- Nearly a quarter of these homes are currently needed to address current housing shortages.

OHCS's RHNA was conducted with extensive stakeholder outreach and coordination. The methodology used to determine overall regional need consisted of estimates for projected need, current underproduction, and housing for people experiencing homelessness. Using this methodology, OHCS was able to estimate the number of future housing needs by unit type and income level. OHCS was able to create a regional fair share approach to affordable housing planning across the State.⁴⁷

Currently, OHCS and DLCD are working with stakeholder groups and the State legislature to create an RHNA implementation plan. OHCS has created regular legislative reports and is working with the RHNA working group to publish a final RHNA report by the end of 2022.⁴⁸

⁴⁵ Oregon State Legislature, Regional Housing Needs Analysis Memo (April 2021), <https://olis.oregonlegislature.gov/liz/2021r1/Downloads/CommitteeMeetingDocument/244208>

⁴⁶ OHCS, Implementing a Regional Housing Needs Analysis Methodology in Oregon (March 2021), <https://www.oregon.gov/ohcs/about-us/Documents/RHNA/RHNA-Technical-Report.pdf>

⁴⁷ OHCS, Regional Housing Needs Analysis Companion Summary (February 2021), <https://www.oregon.gov/ohcs/about-us/Documents/RHNA/02-21-2021-ECONW-OHCS.pdf>

⁴⁸ Oregon Department of Land Conservation and Development, RHNA Working Group Meeting (October 28, 2021), https://www.oregon.gov/lcd/UP/Documents/20211028_RHNA_WorkGroup_Mtg1.pdf

3.2.7.2.8.3 OHCS and the Oregon Disaster Recovery Housing Task Force

The Oregon Disaster Recovery Plan was developed by the Oregon Military Department and OEM and published in March 2018.⁴⁹ The plan is an all-hazards document that gives the State a scalable recovery organization that can be implemented for incidents of varying levels of complexity. This plan guides the State's recovery operations while complementing and supporting the response and recovery plans and procedures of responding agencies; local and tribal governments; special districts; and other public, nonprofit/volunteer, and private sector entities.

The plan outlines seven State Recovery Functions (SRFs), which serve as the State's organizing structure for coordinating a recovery and supporting local and tribal recovery organizations. Each SRF has defined responsibilities; however, the SRFs are designed to work together to rebuild housing in Oregon, recognizing the nexus of housing recovery and all SRFs. Oregon's SRF framework aligns with federal Recovery Support Functions to facilitate and accelerate communication, whole community coordination, and delivery of resources. Each SRF is led by a coordinating agency or team (see the table below).

Table 30: State Recovery Function by Agency

State Recovery Function (SRF)	Coordinating Agency or Team
1 – Community Planning and Capacity Building	Oregon Department of Land Conservation and Development
2 – Economic Recovery	Business Oregon
3 – Health Services	Oregon Health Authority
4 – Social Services	Oregon Department of Human Services
5 – Disaster Housing	Oregon Housing and Community Services
6 – Infrastructure Systems	Oregon Department of Administrative Services, Oregon Department of Energy, Oregon Department of Transportation, Public Utility Commission of Oregon
7 – Natural and Cultural Resources	Oregon Department of Environmental Quality

⁴⁹ Oregon Office of Emergency Management, State Disaster Recovery Plan (March 2018), https://www.oregon.gov/oem/Documents/OR_RECOVERY_PLAN_MARCH_2018.pdf

OHCS is the designated lead agency for SRF 5, which is responsible for addressing pre- and post-disaster housing issues; facilitating the delivery of State resources to assist local and tribal governments in the rehabilitation and reconstruction of destroyed and damaged housing; and developing new accessible, long-term housing options.⁵⁰ As an organization, OHCS is committed to ensuring that all Oregonians have the opportunity to pursue prosperity and live free from poverty, with an agency mission of providing stable and affordable housing and engaging leaders to develop and integrate a statewide policy that addresses poverty and provides opportunities for Oregonians.

In the course of responding to the 2020 Wildfires through SRF5, OHCS and coordinating agencies created the Oregon Disaster Housing Task Force, which includes multiple State, federal, regional, local, and nonprofit organizations. In the beginning days of the recovery, the Task Force committed to focusing on equity and racial justice in disaster recovery, following the State of Oregon Equity Framework,⁵¹ which defines the following historically and currently underserved communities:

- Native Americans, members of Oregon's nine federally recognized tribes; American Indians; Alaska Natives
- Black, Africans, African Americans
- Latine, Hispanic
- Asian, Pacific Islanders
- Immigrants, refugees, asylum seekers
- Undocumented, DREAMers
- Linguistically diverse
- People with disabilities
- LGBTQ+
- Aging/Older adults
- Economically disadvantaged
- Agricultural workers, migrant workers
- Those living in rural parts of the State

⁵⁰ Oregon Office of Emergency Management, State Disaster Recovery Plan (March 2018), https://www.oregon.gov/oem/Documents/OR_RECOVERY_PLAN_MARCH_2018.pdf

⁵¹ Oregon State Legislature, Equity Framework in COVID-19 Response and Recovery, <https://digital.osl.state.or.us/islandora/object/osl%3A948967/datastream/Obj/view>

Through the course of their work, the Task Force developed the following goals and strategies for the State's recovery, which have been further detailed in the State's Disaster Housing Recovery Action Plan, completed in June 2021. These goals include strategies focusing on equity and racial justice.

- **Goal 1: Create intermediate housing solutions.** Provide short-term living solutions for wildfire survivors to meet basic needs with a focus on providing the support and services necessary to find and secure longer term housing.
- **Goal 2: Bolster local capacity.** Increase local capacity to promote an intermediate and permanent housing supply.
- **Goal 3: Expedite the delivery of permanent housing solutions.** Provide cross-cutting strategies that facilitate all housing types, tenures, and income levels that result in new construction and reconstruction in wildfire-impacted counties by 2025.
- **Goal 4: Build community and family resilience.** Ensure that, as families and communities rebuild, they can incorporate lessons from the 2020 Wildfires and strengthen their ability to withstand future natural disasters with minimal disruption.

The Disaster Housing Recovery Action Plan serves as a foundational document for the work that OHCS has carried out through the development of the CDBG-DR Action Plan.

3.2.7.2.8.4 Governor's Wildfire Economic Recovery Council

Oregon Governor Kate Brown established the Wildfire Economic Recovery Council (WERC) in October 2020 to evaluate the economic and community needs of Oregonians statewide following the 2020 wildfire season. Membership included more than 40 leaders from across the State, including elected officials, business and nonprofit representatives, philanthropy community leaders, tribal leaders, federal delegation representatives, State agencies, and the Office of the Governor. WERC also established a regional response team that included representatives from FEMA, Regional Solutions, and key State and local agencies. The eight Regional Solutions coordinators served as a key interface between State and local recovery efforts, including standing up regional councils and elevating issues to the Governor's Council.⁵²

⁵² Office of the Governor, Wildfire Economic Recovery Council, https://www.oregon.gov/gov/policies/Wildfire/Programs/Council/Documents/Wildfire-Prog-Dir-Rpt_March-2022.pdf

WERC published a report⁵³ of its findings and key recommendations to provide direction to State agencies as they set out to implement the actions enumerated in the SRFs. The report also suggested specific investments to the Oregon state legislature. The report includes 23 recommendations centered on housing and sheltering, debris and cleanup, and recovery and rebuilding. The recommendations that are key to recovery and rebuilding are as follows:

- Focus on equitable delivery of emergency preparedness and recovery programs to ensure that underrepresented community members have a voice.
- Leverage public investment to rebuild the housing units that were lost in the impacted communities.
- Bolster community support and workforce development so that communities are the authors of their own recovery.
- Use State funds to fully leverage FEMA's Hazard Mitigation Grant Program to reduce future wildfire and associated risks, prioritizing the communities impacted by the 2020 Wildfires.
- Ensure that FEMA mitigation funds are considered for all FEMA Public Assistance Program repair or replacement projects.
- Address utility issues related to sewer systems, broadband, water quality, and power lines.

3.2.7.2.8.5 HB 2100: Task Force on Homelessness and Racial Disparities in Oregon

In June 2021, the 81st Oregon Legislative Assembly passed House Bill 2100. One component of this bill was the establishment of a 19-member Task Force on Homelessness and Racial Disparities in Oregon. This group was tasked with developing a report to identify and investigate methods by which the State could decrease the rates of racial disparity among people experiencing homelessness and propose recommendations to the State legislature for potential changes to funding structures, methods for distributing information about needed services, and methods to modify contracting processes and eligibility for the providers of services for individuals experiencing homelessness and housing insecurity.

The Task Force published their report in January 2022.⁵⁴ To develop meaningful recommendations, the Task Force investigated existing datasets, both looking at national statistics and Oregon-specific information. What the data demonstrated is that the

⁵³ Office of the Governor, Wildfire Economic Recovery Council, https://www.oregon.gov/gov/policies/Wildfire/Programs/Council/Documents/Wildfire-Prog-Dir-Rpt_March-2022.pdf

⁵⁴ OHCS, House Bill 2100, Task Force on Homelessness and Racial Disparities in Oregon, <https://www.oregon.gov/ohcs/get-involved/Documents/01-21-2022-Findings-and-Recommendation.pdf>

percentage of homelessness is greater than the percentage of the population in Oregon for Black, American Indian or Alaska Native, and Native Hawaiian or Other Pacific Islander (in some cases, as much as four times more homelessness than their share of the total State population).

In addition to data analytics, the Task Force conducted surveys, interviews, and working groups. Ultimately, the Task Force generated 35 recommendations to address the four goals laid out in HB 2100. Many of these recommendations focus on aligning State activities and federal programs administered by the State in a way that takes measurable steps toward prioritizing equity and inclusion, such as more meaningful engagement with people with lived experiences to move them from below the radar in planning processes to acting as influencers.

As the work of this Task Force has occurred during the critical time between the disaster event and the establishment of meaningful housing programs with CDBG-DR resources, through close coordination and management from OHCS, the State is well positioned to act on these recommendations and the data collected through this process.

3.2.7.3 Statewide Demographics and Disaster-Impacted Populations

In planning the use of funds, it is critical to include vulnerable and historically underserved populations. Minority populations are more likely to be uninsured and not have sufficient resources to recover from a disaster. The table below shows the number and percentages of persons, according to race and ethnicity, within the state (State Estimates), the 20 disaster declared counties (Disaster Declaration Estimates), and the most impacted and distressed counties (MID Estimates). In the most impacted distressed areas Hispanic and Latine individuals represent over 13% of the total population, minority individuals represent 11% of the total population, and individuals of two or more races represent just under 10% of the total population. This information is critical for Oregon to consider as it designs programs with targeted strategies that will help people of color and Latine individuals overcome barriers that have historically resulted in exclusionary housing outcomes.

Table 31: Race and Ethnicity

Demographic	State Estimates	State Percentage	Disaster Declaration Estimates	Disaster Declaration Percentage	MID Estimates	MID Percentage
Total population	4,089,521	100%	1,676,253	41.0%	1,609,968	39.4%
Under 5 years	230,556	5.6%	94,418	5.6%	90,317	5.6%
65 years and older	427,294	10.4%	190,638	11.4%	182,196	11.3%
Population with a Disability	587,093	14.4%	261,454	15.6%	248,963	15.5%
White or Caucasian	3,450,208	84.4%	1,459,658	87.1%	1,401,924	87.1%
Black or African American	75,891	1.9%	14,885	0.9%	14,431	0.9%
American Indian and/or Alaska Native	46,785	1.1%	19,339	1.2%	16,468	1.0%
Asian	180,072	4.4%	41,052	2.4%	40,378	2.5%
Native Hawaiian and Other Pacific Islander	16,453	0.4%	6,161	0.4%	6,116	0.4%
Hispanic or Latine	588,757,	13.89%	520,224	13.54%	228,337	13.17%
Other	125,026	3.1%	53,608	3.2%	52,077	3.2%

Source: 2020: ACS 5-Year Estimates Subject Tables S1810 DISABILITY CHARACTERISTICS

When a disaster strikes, households with children and/or seniors have additional needs including helping children cope with recurring trauma from seeing standing burned trees, being displaced from their communities and schools, and the loss of all their belongings. Seniors disproportionately face additional costs related to replacing medical equipment and face similar temporary and permanent housing accessibility challenges faced by individuals living with disabilities. The table below shows the number of children and seniors living in the disaster impacted counties. There are nearly 450,000 children under the age of 18 and over 300,000 seniors living in the most impacted and distressed areas. While all these residents may not have experienced direct housing losses from DR-4562, the trauma and additional strains on existing resources may have a disproportionate impact on services and housing available to accommodate children and seniors.

Table 32: Age and Sex

Demographic	State Estimates	State Percentage	Disaster Declaration Estimates	Disaster Declaration Percentage	MID Estimates	MID Percentage
Total Population	4,129,803	100%	3,751,199	100%	1,622,727	100%
Under Age 5	230,557	5.60%	208,584	5.56%	90,317	5.57%
Under Age 18	867,943	21.00%	783,754	20.89%	345,288	21.28%
Over Age 65	709,555	17.20%	634,413	16.91%	305,035	18.80%
Male	2,047,388	49.60%	1,856,102	49.48%	799,955	49.30%
Female	2,082,465	50.40%	1,895,097	50.52%	822,772	50.70%

Source: ACS 5-Year Estimates (2015–2019).

Persons who are socially vulnerable are more likely to be adversely impacted by a disaster and have more challenges in recovering. Persons with disabilities have less mobility, need special equipment to evacuate, and many have service animals that need to be considered when a disaster occurs. Persons with disabilities face disproportionate challenges in finding suitable housing to accommodate their special needs and the additional costs for accessible safe permanent housing. The table below illustrates the number and percentages of socially vulnerable persons living in the most impacted and distressed areas within the 20 disaster declared counties. People with disabilities represent 15.36% of the population living in the areas that are identified as most impacted and distressed from the 2020 wildfires. While not every person with a disability may have experienced a direct impact from the disaster, the data informs how the programs will be made available to any person with a disability that was directly impacted by the disaster and making their social community more resilient for any future disasters.

Table 33: Social Vulnerability and Protected Classes

Demographic	State Estimates	State Percentage	Disaster Declaration Estimates	Disaster Declaration Percentage	MID Estimates	MID Percentage
Total Population	4,081,943	100%	3,707,150	100%	1,603,564	100%
Persons with Disabilities	584,576	14.32%	275,830	7.44%	246,377	15.36%
Single-Parent Households	125,899	3.08%	62,093	1.67%	52,077	3.25%
Speaks English "Less Than Well"	114,957	2.82%	68,004	1.83%	34,609	2.16%
Foreign-Born	405,821	9.94%	255,971	6.90%	121,139	7.55%

Source: ACS 5-Year Estimates (2014–2018).

3.2.7.4 Education Demographics

Education can be an indicator of resiliency during a disaster. Individuals with a college degree are more likely to have the resources to plan for and recover from a disaster. The table below illustrates the educational levels for individuals age 25 and older in the disaster declared counties and . In the disaster declared counties over 17% represent individuals with some college and no degree living in the counties. Over 7% represent individuals with a Bachelor's Degree or higher living in the most impacted and distressed areas compared to the 33.70% that represent individuals with a Bachelor's Degree or higher within the state.

Table 34: Education Demographics

Education (population age 25 and older)	State Estimates	State Percentage	Disaster Declaration Estimates	Disaster Declaration Percentage	MID Estimates	MID Percentage
High School Graduate or Equivalent	659,085	22.70%	585,653	15.61%	282,478	6.84%
Some College, No Degree	737,003	25.40%	666,484	17.77%	310,875	7.53%
Associate's Degree	257,692	8.90%	233,202	6.22%	105,324	2.55%
Bachelor's Degree or Higher	975,920	33.70%	687,916	18.34%	322,503	7.81%

Source: ACS 5-Year Estimates (2015–2019).

3.2.7.5 Income Demographics

Income levels disproportionately affect a person's ability to be resilient and mitigate the negative impacts when a disaster happens and low-income persons have more challenges in being able to replace everything destroyed in a disaster and fully recover from it. They are more likely to not have savings or insurance available to them for an immediate temporary housing solution as they attempt to recover and get stabilized. In addition, their economic and in some cases their housing situations were exacerbated by COVID-19. The table below shows a comparison of the median household income and the per capita income (mean income calculated for all individuals in a specific area) as well demonstrating that over 400,000 persons living in the disaster declared counties have incomes below the poverty level. Persons living in poverty have a difficult time finding affordable housing that meets the needs of their families and tend to live on meager means. The proposed programs prioritize low-income persons to improve their access to affordable housing and their resiliency of disasters.

Table 35: Income

Income/Economic Demographics	Statewide	Counties Impacted by Disaster	MIDS
Median Household Income	\$62,818	\$55,250	\$56,713
Per Capita Income	\$33,763	\$30,194	\$30,067
Persons with Income Below the Poverty Level in the Past 12 Months	951,718	482,659	217,235

Source: ACS 5-Year Estimates (2015–2019).

3.2.7.6 LMI Analysis – Statewide

The programs in this plan have been designed to prioritize low-and-moderate income (LMI) persons and meet the overall LMI benefit expenditure requirements in aggregate. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent of the total allocation must be expended to benefit populations within the MID. As defined by HUD, LMI households earn a gross household income of under 80 percent of Area Median Income (AMI), adjusted for family size. The tables (36 and 37) below illustrate the number of LMI persons living in disaster and non-disaster impacted counties. The percentages of LMI persons living in the most impacted and distressed areas are more than twice the statewide percentage with Lane County having the highest percentage of 42.29% LMI persons living in their county. The information is critical to the strategic planning of investing the funds to benefit LMI households through public services programs, affordable housing, and homeownership opportunities.

Table 36: Statewide LMI

Category	Total LMI Persons	Total Population	Percentage of LMI
Statewide	644,694	4,129,803	15.61%

Source: ACS 5-Year Estimates (2015–2019).

3.2.7.7 LMI Analysis – Federally Declared Disaster Areas

Table 37: LMI by County

County	Non-MID Total LMI Persons	Non-MID Total Population	Non-MID Percentage LMI	MID Total LMI Persons	MID Total Population	MID Percentage of LMI
HUD and Grantee MIDs						
Clackamas	–	–	–	136,390	389,438	35.02%
Douglas	–	–	–	44,055	107,194	41.10%
Jackson	–	–	–	86,430	208,363	41.48%
Klamath	28,160	65,972	42.68%	–	–	–
Lane	–	–	–	150,985	357,060	42.29%
Lincoln	–	–	–	18,145	46,347	39.15%
Linn	–	–	–	49,164	118,971	41.32%
Marion	–	–	–	131,365	323,259	40.64%
Other Impacted Counties						
Benton	39,545	86,495	45.72%	–	–	–
Columbia	22,685	49,389	45.93%	–	–	–
Coos	26,330	62,775	41.94%	–	–	–
Deschutes	64,224	166,622	38.54%	–	–	–
Jefferson	8,795	22,061	39.87%	–	–	–
Josephine	37,925	83,409	45.47%	–	–	–
Lake	3,675	7,842	46.86%	–	–	–
Multnomah	360,560	768,418	46.92%	–	–	–
Tillamook	9,735	25,430	38.28%	–	–	–
Wasco	9,409	25,492	36.91%	–	–	–
Washington	208,570	556,210	37.50%	–	–	–
Yamhill	47,315	101,119	46.79%	–	–	–

Source: ACS 5-Year Estimates (2011–2015).

3.2.7.8 Manufactured Homes Impacted by Disaster

The table below shows the manufactured home inventory for the disaster impacted counties. Both Jackson and Lincoln have over 50% of total manufactured homes in their respective counties.

The insurance data available does not separate out the amount paid for property losses to mobile home and manufactured homeowners, so no insurance proceeds are included in the unmet need calculation. However, while all types of home and property owners impacted by DR-4562 are facing challenges with having adequate insurance to cover the costs to rebuild or replace damaged housing in the current market, mobile and manufactured homeowners face additional challenges related to insurance.

One of the challenges comes from the date of the home. HUD passed regulations in 1976 around national standards for “manufactured homes,” and homes built before 1976 are more difficult or expensive to insure because they do not meet the federally regulated safety standards. Therefore mobile homeowners of units that pre-date 1976 are more likely to be uninsured or only have personal contents insurance.

Over half of the manufactured homeowners (owners of homes built after 1976) consider themselves uninsured or underinsured, based on surveys carried out by disaster case managers, long-term recovery groups, and community based organizations. In addition, the costs of new manufactured homes have increased dramatically since 2014⁵⁵, which has widened the gap between the amount paid by insurance (when available) and the amount it costs to replace destroyed manufactured homes. In addition, many of the septic, well, and park improvements (car ports, decks, etc.) were not covered by insurance or FEMA and therefore present an additional unmet need faced by manufactured homeowners.

To determine the unmet need for manufactured homes, the State determined the average cost of a manufactured home in an investor-owner manufactured housing park using data from OHCS’s Manufactured Home Replacement Program. From this average cost value the FEMA Individuals and Households Program awards were subtracted to determine the unmet need amount.

⁵⁵ [Dickerson, Lillian, Mobile Homes See Values Surge Faster than Single-Family Homes \(December 2021\). inman.com.](#)

Table 38: Manufactured Homes

County	No. of Units	Percentage of Total Units in County	Unmet Need
Clackamas	19	7.0%	\$2,530,516
Douglas	32	5.2%	\$4,222,801
Jackson	938	53.4%	\$116,921,994
Klamath	4	10.8%	\$553,213
Lane	84	21.1%	\$11,134,430
Lincoln	126	53.6%	\$16,421,808
Linn	24	18.6%	\$3,097,086
Marion	76	19.2%	\$10,078,270
Total	1,303		\$164,960,118

Source: FIDA 40449 DR-4562, February 17, 2022.

3.2.7.9 SNAP and D-SNAP Applicants Impacted by Disaster

The Department of Human Services oversees the Disaster Supplemental Nutrition Assistance Program (SNAP). They do not collect data on SNAP for non-disaster participants. The State is working to identify comprehensive data for the remaining fields below.

The SNAP program offers food benefits to low-income individuals and families. When a disaster occurs individuals and families may be eligible for additional nutrition assistance through the Disaster Supplemental Nutrition Assistance Program (D-SNAP). The table below shows that in the disaster declared counties 1,550 households received additional food benefits.

Table 39: SNAP and D-SNAP Applicants Impacted by Disaster

County	# SNAP Households	# SNAP Individuals	# Households Issued D-SNAP	# Individuals Issued D-SNAP
HUD and Grantee MIDs				
Clackamas	Data pending	Data pending	40	Data pending
Douglas	Data pending	Data pending	207	Data pending
Jackson	Data pending	Data pending	417	Data pending
Klamath	Data pending	Data pending	36	Data pending
Lane	Data pending	Data pending	181	Data pending
Lincoln	Data pending	Data pending	160	Data pending

County	# SNAP Households	# SNAP Individuals	# Households Issued D-SNAP	# Individuals Issued D-SNAP
Linn	Data pending	Data pending	93	Data pending
Marion	Data pending	Data pending	416	Data pending

Source: ODHS DCM Profile Report

3.2.7.10 Limited English Proficiency Breakdown

Language can be a barrier for individuals and households to get access to the resources and services they need for a full recovery. Not knowing English can impede a person's ability to understand what resources are available to them, how to access the resources, and their ability to communicate their needs for a full recovery. To assist the state in removing the barrier, the tables below (40 and 41) breaks down persons who are affected by this barrier living in the disaster declared counties. In all of the counties Spanish is the language that has the highest percentage of persons who speak it. The state uses this information for their Citizen Participation Plan and will consider it in the implementation of their recovery programs to ensure that the language barrier is removed. Public information is translated into Spanish and interpreters are available to assist in communications. For all other languages, translation and interpreters will be made available as needed.

Table 40: Breakdown of Limited English Proficiency

County	Estimate Speaking English Less Than "Very Well"	Percentage Speaking English Less Than "Very Well"
Clackamas	6,971	1.80%
Douglas	554	5.00%
Jackson	3,675	1.80%
Klamath	1,095	1.80%
Lane	3,923	1.10%
Lincoln	296	6.00%
Linn	1,452	1.30%
Marion	17,738	5.70%

Source: ACS 5-Year Estimates (2014–2018).

3.2.7.11 Languages Spoken Within the State

Table 41: Languages Spoken within the State

Languages Spoken	Estimate Number Population	Percentage of Population	County
Spanish	8,523	2.08%	Clackamas
Chinese	1,713	0.42%	Clackamas
Russian	1,447	0.35%	Clackamas
Spanish	862	0.79%	Douglas
German	56	0.05%	Douglas
Other Pacific Islander Language	46	0.04%	Douglas
Spanish	5,734	2.65%	Jackson
French	190	0.09%	Jackson
Other Pacific Islander Language	177	0.08%	Jackson
Spanish	1,442	2.15%	Klamath
Tagalog	36	0.05%	Klamath
Thai	35	0.05%	Klamath
Spanish	5,872	1.57%	Lane
Chinese	1,566	0.42%	Lane
Hungarian	469	0.13%	Lane
Spanish	1,164	2.40%	Lincoln
Tagalog	37	0.08%	Lincoln
German	30	0.06%	Lincoln
Spanish	1,714	1.37%	Linn
Tagalog	87	0.07%	Linn
Vietnamese	66	0.05%	Linn
Spanish	27,117	7.98%	Marion
Russian	1,695	0.50%	Marion
Chinese	594	0.17%	Marion

Source: ACS 5-Year Estimates (2015–2019).

3.2.7.12 Affected Continuum of Care Entities

Individuals and households experiencing homelessness are vulnerable in disasters because many of them do not have a permanent home and lack the resources to receive communication about disasters. Most do not have any means of transportation to gather their belongings and evacuate. Many struggle with mental illness, they are traumatized by their situation of not knowing where their next meal is coming from or where they will sleep at night. It takes targeted and specialized support services and outreach that builds trust to help them get into safe affordable permanent supportive housing. The tables below (42, 43 and 44) illustrate the number of persons experiencing homelessness by Continuum of Care regions and county. The point-in-time counts show that the range of unsheltered homeless ranges from 82 in Linn County to 1,900 in Lane and Lincoln Counties. This information is used to incorporate non-traditional outreach methods to inform persons experiencing homelessness and connecting them to the right resources for recovery.

Table 42: Affected Continuum of Care Entities

CoC Number	CoC Entity	Impacted County	Homeless Count
OR-507	Clackamas County Continuum	Clackamas	492
OR-505	Rural Oregon Continuum	Douglas	197
OR-502	Jackson County Continuum	Jackson	766
OR-505	Rural Oregon Continuum	Klamath	261
OR-500	Lane County Continuum	Lane	2317
OR-505	Rural Oregon Continuum	Lincoln	36
OR-505	Rural Oregon Continuum	Linn	320

Source: Oregon Statewide Homelessness Estimates 2021 Report, includes sheltered and unsheltered individuals

3.2.7.13 Point-in-Time Count – Type of Shelter

Table 43: Point in Time County – Type of Shelter

Scale of Data	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Clackamas	N/A	191	301	492
Douglas	N/A	197	0	197
Jackson	N/A	342	424	766
Klamath	N/A	23	238	261
Lane	N/A	327	1990	2317
Lincoln	N/A	36	0	36
Linn	N/A	238	82	320

Source: Oregon Statewide Homelessness Estimates 2021 Report

3.2.7.14 Point-in-Time Count – Impacted by Disaster

Table 44: Point-in-Time Count – Impacted by Disaster

Scale of Data	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Clackamas	0	191	301	492
Douglas	1	197	0	198
Jackson	248	342	424	1,014
Klamath	6	23	238	267
Lane	88	327	1990	2,405
Lincoln	59	36	0	95
Linn	0	238	82	320

Source: Oregon Statewide Homelessness Estimates 2021 Report and Non-Congregate Shelter Data from ODHS (April 2022)

3.2.7.15 HUD-Assisted Housing Impacted by Disaster

Public Housing is an integral part of a community's housing inventory. The table below shows the number of public housing units and that 75 Housing Choice Voucher units were impacted by the disaster.

Table 45: HUD-Assisted Housing Impacted by Disaster

County	Total Housing Choice Vouchers	Total Impacted -Housing Choice Voucher Units	Total LIHTC* Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units
TOTAL (Clackamas, Douglas, Jackson, Klamath, Lane, Lincoln, Linn, and Marion)	12,104	75	3,020	0	8,582	0

* LIHTC – Low-Income Housing Tax Credit Program

3.3 Infrastructure Unmet Needs

3.3.1 Statewide Infrastructure Loss and Damages

FEMA, Oregon State agencies, and local communities have identified considerable impacts on public facilities and infrastructure from the 2020 Wildfires. While FEMA has determined more than \$581 million in damages to be eligible under its Public Assistance Program, that number does not reflect the entirety of the 2020 Wildfires' impact. Not only was the damage considerable in scale, but the wildfires also impacted a wide range of facility types, including public buildings, roads and bridges, utilities, and parks.

3.3.1.1 Roads and Bridges

Many roads and bridges were damaged and/or forced to close as a result of the 2020 Wildfires, many for an extended period of time. At least nine State highways and two interstate highways were forced to close due to fire hazards and many remained closed until the damage could be repaired. Several towns in Jackson County, including Phoenix and Talent, suffered significant damage to roads, street signs, and guardrails. Many roads suffered further damage from unusually-high usage by heavy equipment during clean-up, debris removal and hazard debris removal phases of recovery.

3.3.1.2 Buildings and Equipment

The 2020 Wildfires also had a devastating impact on buildings and equipment in the State—at least 923 nonresidential buildings across seven counties were damaged or destroyed, including fire stations in McKenzie Bridge, White City, and Phoenix. Jackson County also lost several vehicles, outbuildings, tools, and equipment. Also, in Phoenix, the Southern Oregon Education Service District lost its entire campus.

3.3.1.3 Utilities

Perhaps the costliest infrastructure damage occurred to utilities, including power generation and distribution, water treatment and distribution, and communications. In Lane County alone, more than 40 miles of electrical infrastructure required complete replacement as did significant public safety communications infrastructure. Several citizens did not receive evacuation notices after a communications tower on Mt. Hagen was destroyed.

As communities rebuild electrical systems, many utility providers are rebuilding more resiliently by undergrounding electrical lines. FEMA is helping cover many of these costs through FEMA PA for damaged or destroyed lines, but the federal funding available is not sufficient to cover all undergrounding costs, including those costs to underground utility lines to individual residences and commercial businesses. Those utility lines that remain above ground continue to be at-risk to the impacts from future disasters.

A total of 146 public water systems were affected by the 2020 Wildfires, including 50 with surface water sources and 96 with groundwater source areas within the wildfires' perimeters. The initial wildfire impacts interrupted electrical power and limited access to water treatment plants, prompting many water systems to issue boil water notices due to a loss of system pressure. In addition to water quality issues, some water systems, such as the Blue River Water District, suffered damage to their delivery system, which resulted in a loss of the potable water function. Over the long term, changes in watersheds caused by the 2020 Wildfires may increase treatment costs, diminish reservoir capacity, and even result in the need for alternative water sources.

In addition to the destruction to existing public water systems, many rural residents, businesses, and local governments were on private septic and well systems. Prior to the wildfires, many communities were contemplating the timing, cost analysis, and need for municipal water and wastewater treatment systems. With the destruction from the wildfires and new Oregon building codes, many residential properties repairs can no longer be grandfathered into allowing for pre-disaster infrastructure replacement. Based on initial estimates from local governments across the impacted areas, there are over \$300 million

in post-disaster municipal water and sewerage system needs to comply with current more resilient standards. These costs are not eligible under FEMA PA because the needed infrastructure did not exist prior to the disaster.

Access to water to help put out the wildfires was a particular challenge for many communities. As communities recover, they will consider additional or alternative ways to ensure there is sufficient water or other fire suppression plans and resources in place to combat future wildfires.

3.3.1.4 Parks, Recreation, and Other Facilities

The 2020 wildfire season also had a significant impact on the State's public recreation facilities and natural resources, resulting in the closure of many Oregon Department of Forestry, Oregon Parks and Recreation, U.S. Bureau of Land Management, U.S. Forest Service National Forests and Scenic Areas, and U.S. Army Corps of Engineers recreation areas, some of which remained closed for extended periods. The Labor Day fires burned more than 16,000 acres of the Santiam State Forest, including several popular recreation sites, roads, and natural resources, some of which remain closed as of this writing. Numerous recreation sites were also impacted along the North Umpqua River by the Archie Creek Fire. Highway 224, which leads to a popular recreation corridor along the Clackamas River, remained closed for over a year after the fire.⁵⁶ In addition to the emergency work and permanent costs that resulted from these damages, the State also lost considerable revenue from tourism, recreation, and visitation, upon which its economy relies.

3.3.1.5 Local Capacity Challenges for Navigating Post-Fire Complexities

Many local government officials and nonprofit leaders in MID areas have reported that they do not have the capacity or resources to support the effort necessary to address the many remaining overwhelming needs.

Their tax bases have also been diminished. From the community perspective, they need resources to be able to continue the rebuilding process.⁵⁷

⁵⁶ Willamette Week, Highway 224 in the Fire-Damaged Clackamas River Corridor Is One Step Closer to Reopening, [Highway 224 in the Fire-Damaged Clackamas River Corridor Is One Step Closer to Reopening \(ww.com\)](https://www.oregon.gov/gov/policies/Wildfire/Programs/Council/Documents/Highway-224-in-the-Fire-Damaged-Clackamas-River-Corridor-Is-One-Step-Closer-to-Reopening-(ww.com))

⁵⁷ Office of the Governor, Wildfire Economic Recovery Council, https://www.oregon.gov/gov/policies/Wildfire/Programs/Council/Documents/Wildfire-Prog-Dir-Rpt_March-2022.pdf, p. 13

3.3.2 FEMA Programs

FEMA's Public Assistance Program (PA) provides supplemental grants to State, tribal, territorial, and local governments, and certain types of private nonprofits so that communities can quickly respond to and recover from major disasters or emergencies. FEMA also encourages the protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process.

To access FEMA PA funds, eligible applicants must submit a request for grant funds to the PA primary grant recipient, which in the case of Oregon is the Office of Emergency Management, which evaluates eligibility for PA with FEMA. For DR-4562, FEMA is authorized to reimburse not less than 75% of the eligible costs of specific types of disaster response and recovery work undertaken by eligible applicants. FEMA may recommend that the President increase the federal cost share, where warranted. Oregon has requested an increase in the federal share for DR-4562; however, this request was not approved. However, see below, the cost share was later adjusted nationally.

FEMA PA-eligible activities include short-term emergency work and long-term permanent work. Emergency work is divided into two categories: Debris Removal (Category A) and Emergency Protective Measures (Category B). Direct assistance for debris removal is provided if FEMA determines that such work is in the public interest. Permanent work is broken down into five categories: Roads and Bridges (Category C); Water Control Facilities (Category D); Buildings and Equipment (Category E); Utilities (Category F); and Park, Recreational, Railway, Beaches, Piers, Ports, and Harbors (Category G). Permanent work may only be authorized under a major disaster declaration.⁵⁸ Table 46 outlines which counties qualified for which FEMA PA categories under DR-4562. For the purposes of the needs assessment, HUD only considers needs associated with categories C through G (Permanent Work).

On March 18, 2022, FEMA announced that additional disaster funding is available to all states, tribal nations, and territories with Presidential major disaster and emergency declarations occurring in 2020. Through the March 15, 2022 H.R. 2471, Consolidated Appropriations Act, 2022, Congress granted a minimum 90% federal cost share for disasters that include DR-4562. This applies to Public Assistance and Hazard Mitigation Grant Program.

⁵⁸ Congressional Research Service, FEMA PA Overview, <https://crsreports.congress.gov/product/pdf/IF/IF11529>, p. 1-2

The figures below reflect a non-federal cost share of 25%. The State will update the Unmet Needs assessment in the next Action Plan amendment, after OEM receives additional guidance from FEMA on how to apply the revised cost share down to 10%. At present, it is anticipated the non-federal cost share need will be reduced by \$115 million.

Table 46: DR-4562: FEMA PA-Eligible Counties

County	Cat A	Cat B	Cat C	Cat D	Cat E	Cat F	Cat G
Benton	X						
Clackamas	X	X	X	X	X	X	X
Columbia	X						
Coos	X						
Deschutes	X						
Douglas	X	X	X	X	X	X	X
Jackson	X	X	X	X	X	X	X
Jefferson	X						
Josephine		X	X	X	X	X	X
Klamath	X	X	X	X	X	X	X
Lake	X						
Lane	X	X	X	X	X	X	X
Lincoln	X	X	X	X	X	X	X
Linn	X	X	X	X	X	X	X
Marion	X	X	X	X	X	X	X
Multnomah	X						
Tillamook	X	X	X	X	X	X	X
Wasco	X						
Washington	X						
Yamhill	X						

At the time of publication of this Action Plan, OEM has assessed eligible projects in the FEMA PA categories listed below across the impacted areas, as summarized in the tables below. Initially, PA focused on emergency work and debris removal; however, multiple amendments to the federal declaration authorized permanent repair and replacement work. The expenditure of permanent work funding is subject to the State and local governments providing the non-federal cost share; this State and local share is an eligible use of CDBG-DR funding. This PA-funded permanent work often takes years after a disaster event to be fully assessed and completed.

3.3.3 Hazard Mitigation Grant Program

FEMA's Hazard Mitigation Grant Program (HMGP) provides funding to State, local, tribal, and territorial governments so that they can rebuild in a way that reduces, or mitigates, future disaster losses in their communities. HMGP assists communities in rebuilding in a better, stronger, and safer manner to become more resilient to future natural disaster events. This grant funding is available after a presidentially declared disaster and can fund a wide variety of mitigation projects.

HMGP can be used to fund projects to protect either public or private property, as long as the project fits within State and local government mitigation strategies to address areas of risk and complies with HMGP guidelines.⁵⁹

FEMA conducts a final eligibility review to ensure compliance with federal regulations. HMGP projects must comply with federal environmental laws and regulations, be cost-effective, and be technically feasible. Federal law requires that States and local jurisdictions have a mitigation plan prior to receipt of HMGP funds. The plan identifies hazards, assesses community needs, and describes a communitywide strategy for reducing the risks associated with natural disasters

OEM conducted a call for projects and the submission of grant applications to the State from eligible entities for projects that could reduce property damage from future disasters. American Indian tribes and certain nonprofit organizations also may apply, and local governments may apply for assistance to benefit individual property owners and businesses. For DR-4562, OEM received more than \$237 million in potentially eligible applications, over \$100 million more than what was available through HMGP (\$129.2 million), and therefore they have activated the Interagency Hazard Mitigation Team⁶⁰ to review eligible projects for approval by FEMA. It is anticipated that it will take an additional 6–8 months to complete the review process and determine final projects for HMGP.

The table below indicates the amount of FEMA HMGP funding and need based on the eligible applications received to date, as described above. It includes all projects that are still under review but reflects more funding than what is available through the FEMA HMGP for DR-4562. It is anticipated this number may change once the State and FEMA recalculate the cost share following the changes from H.R. 2471, Consolidated Appropriations Act,

⁵⁹ Oregon Office of Emergency Management, Hazard Mitigation Grant Program, https://www.oregon.gov/oem/Documents/DR4258_Brochure.pdf

⁶⁰ Oregon Office of Emergency Management, State Interagency Hazard Mitigation Team (State IHMT), <https://www.oregon.gov/oem/Councils-and-Committees/Pages/IHMT.aspx>

2022, which granted a minimum 90% federal cost share for DR-4562, including for HMGP. The table below reflects a projected 90% federal cost share and 10% non-federal cost share.

3.3.4 FEMA Public Assistance Program

Table 47: FEMA PA Award Amounts by Category

PA Category	No. of Damaged Sites	Sum of Approx. Cost	Sum of Federal Share Cost	Sum of Non-Federal Share Cost
A – Debris Removal	58	\$304,173,430	\$273,756,087	\$30,417,343
B – Emergency Protective Measures	259	\$164,032,248	\$147,629,023	\$16,403,225
C – Roads and Bridges	41	\$2,692,195	\$2,422,976	\$269,220
D – Water Control Facilities	7	\$294,838	\$265,354	\$29,484
E – Buildings and Equipment	137	\$23,319,260	\$20,987,334	\$2,331,926
F – Utilities	46	\$74,875,694	\$67,388,125	\$7,487,569
G – Parks, Recreational Facilities, and Other Items	57	\$12,325,071	\$11,092,564	\$1,232,507
Z – Management Costs	99	\$28,049,254	\$25,244,329	\$2,804,925
Total	704	\$609,761,990	\$548,785,791	\$60,976,199

Data from OEM FEMA PA Report, February 16, 2022, updated with 10% non-federal cost share calculation.

3.3.5 Total Cost and Need by PA Category

Table 48: FEMA PA Unmet Need by Category

PA Category	Estimated PA Cost	Match Cost	15% Resiliency	Total Need (Match + Resiliency)
A – Debris Removal	\$304,173,430	\$30,417,343	\$45,626,015	\$76,043,358
B – Emergency Protective Measures	\$164,032,248	\$16,403,225	\$24,604,837	\$41,008,062
C – Roads and Bridges	\$2,692,195	\$269,220	\$403,829	\$673,049
D – Water Control Facilities	\$294,838	\$29,484	\$44,226	\$73,710
E – Buildings and Equipment	\$23,319,260	\$2,331,926	\$3,497,889	\$5,829,815
F – Utilities	\$74,875,694	\$7,487,569	\$11,231,354	\$18,718,923

PA Category	Estimated PA Cost	Match Cost	15% Resiliency	Total Need (Match + Resiliency)
G – Parks, Recreational Facilities, and Other Items	\$12,325,071	\$1,232,507	\$1,848,761	\$3,081,268
Total	\$581,712,736	\$58,171,274	\$87,256,911	\$145,428,185

Data from OEM FEMA PA Report, February 16, 2022, updated with 10% non-federal cost share calculation.

3.3.6 Approximate Recovery Cost per Agency

Table 49: Unmet Needs by Organization Type

Agency	Approximate Cost
City or Township Government	\$13,533,937.58
County Government	\$32,122,433.06
Independent School District	\$2,581,024.05
Nonprofit with 501(c)(3) IRS Status	\$68,917,083.33
Nonprofit without 501(c)(3) IRS Status	\$249,530.42
Public/State-Controlled Institution of Higher Education	\$571,137.07
Regional Government Organization	\$313,832.87
Special District Government	\$11,552,201.68
State Government	\$666,888,055.82
Total	\$796,729,235.88

Data from OEM FEMA PA Report, February 16, 2022.

3.3.7 Hazard Mitigation Needs per County or Known Project

Table 50: Hazard Mitigation Needs by County

Project	Cost	Funding Source	Unmet Need (10% local match)
Benton County	\$520,400	FEMA	\$52,040
Clackamas County	\$2,485,670	FEMA	\$248,567
Douglas County	\$17,862,938	FEMA	\$1,786,294
Jackson County	\$4,535,838	FEMA	\$453,584
Josephine County	\$1,085,000	FEMA	\$108,500
Lane County	\$37,879,286	FEMA	\$3,787,929

Project	Cost	Funding Source	Unmet Need (10% local match)
Lincoln County	\$31,143,877	FEMA	\$3,114,388
Marion County	\$200,000	FEMA	\$20,000
Multnomah	\$2,879,355	FEMA	\$287,936
Regional	\$13,575,819	FEMA	\$1,357,582
Umatilla County	\$2,500,000	FEMA	\$250,000
Wasco County	\$331,443	FEMA	\$33,144
Washington County	\$15,854,835	FEMA	\$1,585,484
Clatsop County	\$665,613	FEMA	\$66,561
Coos/Curry County	\$986,357	FEMA	\$98,636
Klamath County	\$217,576	FEMA	\$21,758
Total	\$132,724,006	FEMA	\$13,272,401

Data from OEM HMGP Report, February 15, 2022, updated with 10% non-federal cost share calculation.

3.4 Economic Revitalization Unmet Needs

3.4.1 Disaster Damage and Impacts

The economic destruction from the 2020 Wildfires also was significant. Many people were displaced, including a large population of undocumented workers with limited English proficiency. Businesses that employed thousands of Oregonians were wiped out, leaving some Oregonians unemployed. Private industry structures, including restaurants, shops, grocery stores, and other businesses, were destroyed, threatening the ability for communities to have access to the services needed for residents to come back. The impact varied from community to community, and community-based organizations quickly became overwhelmed.⁶¹ There also were significant wildfire flame and smoke damage to agricultural crops and livestock operations.

3.4.1.1 Unemployment

3.4.1.1.1 Unemployment Claims

Prior to onset of Oregon's 2020 Wildfires, the State was already experiencing a significant economic downturn due to the COVID-19 pandemic. In September 2020, the Oregon Office

⁶¹ Office of the Governor, Wildfire Economic Recovery Council, https://www.oregon.gov/gov/policies/Wildfire/Programs/Council/Documents/Wildfire-Prog-Dir-Rpt_March-2022.pdf, p. 10

of Economic Analysis found that the State had already lost 14% of existing jobs as a result of the pandemic. While all classes of workers suffered large losses, low-wage workers bore the brunt of the economic impacts from COVID-19.⁶²

A more accurate indicator of impacts on jobs due to the 2020 Wildfires is the number of new unemployment insurance and Disaster Unemployment Assistance (DUA) claims. The DUA is funded by FEMA and is administered by the Oregon Employment Department. This program aims to provide temporary unemployment benefits to jobless workers or self-employed individuals who have lost their job or access to work as a direct result of the 2020 Wildfires.

There are many reasons why individuals may not apply for this voluntary assistance; however, the DUA program was authorized for this disaster event and the following tables outline the claims that occurred as a result of the ongoing event at that time.

Table 51: Disaster Unemployment Assistance Claims

Disaster Unemployment Assistance Claims	
Start of Week	No. of Claimants Claiming a Week of Benefits
August 30, 2020	0
September 6, 2020	19
September 13, 2020	133
September 20, 2020	120
September 27, 2020	102

Table 52: Unemployment Insurance Increase Estimates

Unemployment Insurance Increase Estimates				
	Non-Fire-Impacted Counties		Fire-Impacted Counties	
	Number of Claimants	Number of Claimants	Expected Number of Claimants to Claim the Week (assuming no fire)	Increase in the Number of Claimants Who Claimed a Week, Possibly Due to the Fire
August 30, 2020	174,097	95,052		
September 6, 2020	175,580	100,883	95,862	5,021

⁶² Oregon Office of Economic Analysis, Oregon Employment (September 2020), <https://oregoneconomicanalysis.com/2020/10/15/oregon-employment-september-2020/>

Unemployment Insurance Increase Estimates				
	Non-Fire-Impacted Counties		Fire-Impacted Counties	
	Number of Claimants	Number of Claimants	Expected Number of Claimants to Claim the Week (assuming no fire)	Increase in the Number of Claimants Who Claimed a Week, Possibly Due to the Fire
September 13, 2020	173,718	98,056	94,845	3,211
September 20, 2020	166,383	92,168	90,840	1,328
September 27, 2020	162,602	89,937	88,776	1,161

Source: Oregon Employment Department.

Per the Oregon Employment Department, an increase in expected claims can be correlated to an event that causes unemployment with a moderate to high level of confidence, in this case, the 2020 Wildfires. Workers are displaced and businesses must close so an increase in unemployment claims is an expected outcome. However, the further the data is from an event that is likely to cause unemployment, the weaker the correlation to the event becomes.

3.4.1.1.2 Dislocated Worker Program

Oregon's Dislocated Worker Program, administered by the Oregon Higher Education Coordinating Commission (HECC), offers help to both employers and workers before and during a layoff. Local workforce partnerships across the impacted counties submitted requests to the Department of Labor using data from the dislocated worker and employer needs from California's 2017 and 2018 wildfires. Based on this information and projected need for Oregon, the State received \$7,551,112 in dislocated worker grant funding distributed to Rogue Workforce Partnership, Clackamas Workforce Partnership, Lane Workforce Partnership, Northwest Oregon Works, Southwest Oregon Workforce Investment Board, and Willamette Workforce Partnership.

3.4.1.1.3 Impacts on Seasonal and Agricultural Workers

CASA of Oregon and the NOWIA Unete Center for Farm Worker Advocacy conducted a stakeholder outreach survey of Latine community members impacted by the Alameda Fire. In 2021, they published a study showing the disproportionate impact on minority community members, finding that 44% of families relied on seasonal work as their primary source of income. The survey also indicated that 88% of families impacted were, in some way, connected to agriculture within the past 7 years, with 42% working in orchards, 36% in

vineyards, 31% in hemp, 13% in forestry, 15% in dairy/livestock, and 34% in food processing. The survey also found that the median income of survey participants was \$30,000, which is just over half of Jackson County's median household income of \$53,412.⁶³

⁶⁴ The results from this survey indicate that there was a disproportionate impact on agricultural workers during and after the fires.

3.4.1.2 Agricultural Impacts

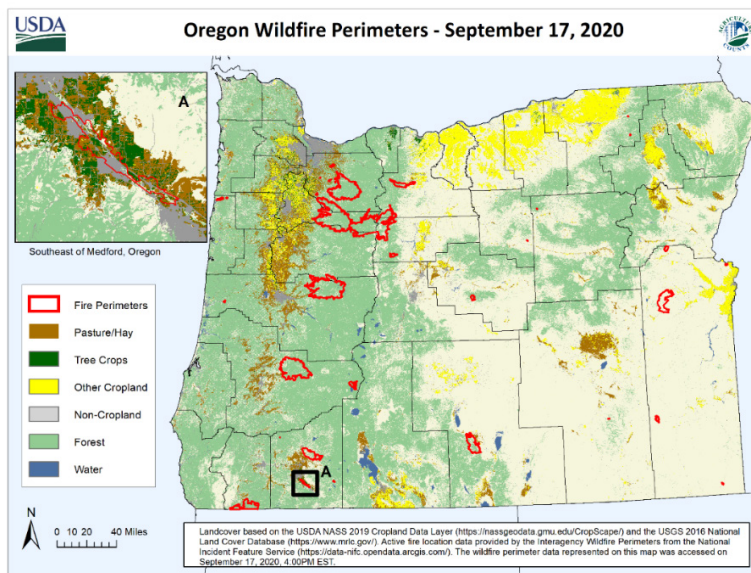
At the time of publication, there was no comprehensive assessment of the value of the loss to the agricultural industry by the Oregon Department of Agriculture from the 2020 Wildfires. However, the 2020 Wildfires did have significant impacts on the agricultural, food, and fiber sectors in Oregon. The crops and livestock most affected included wine vineyards, hemp, hops, recreational marijuana, tree fruit, and cattle.

3.4.1.2.1 Crop Loss

The U.S. Department of Agriculture (USDA) identified 3,975 acres of pasture/hay, 773 acres of tree crops, 1,604 acres of grapes, 75 acres of onions, and 180 acres of sweet corn within the 2020 Wildfire perimeters. Most of the tree crops were contained within the perimeters in Jackson County. The crop insurance payouts that USDA made related to the 2020 Wildfires were \$5,844,055.

A map of the impacts based on USDA crop loss data is included in Figure 12.

Figure 12: Map of Damaged Crops and Burn Scar Areas



⁶³ [U.S. Census Bureau](https://www.census.gov).

⁶⁴ [Alameda Housing Survey, 2021](#).

Aside from direct crop loss due to burned farmland, farmers also experienced losses due to wildfire-related byproducts, such as smoke damage and contamination by ash. The Oregon State University Global Hemp Innovation Center investigated how wildfires impacted the 2020 hemp crop. In Jackson County, for example, there are 6,300 registered hemp acres that the Oregon Department of Agriculture estimates might have been affected by smoke tainted with heavy metals from burning houses, such as chromium and arsenic.⁶⁵

Based on interviews with the Oregon Department of Agriculture, wine vineyards in Oregon have a long history of sharing knowledge, which was especially helpful in addressing the effects of the wildfires. Some of the crop was discarded and some required additional funds in order to produce the wine (e.g., the additional cost of carefully extracting the juice without the skins). New filtering techniques were developed and some wineries purchased grapes grown away from smoke-affected regions in order to supplement their production. Novel ways of marketing that could meet COVID-19 precautions, such as virtual tastings, helped offset some of the COVID-19 losses. Still, the Oregon Wine Board estimates an approximately 20% decline in wine industry revenues due to the pandemic and wildfires.

3.4.1.2.2 Livestock

Wildfires burned both private and public grazing land east of the Cascade Mountains in 2020. These eastern region fires were generally earlier than the devastating Labor Day fires in western Oregon. Ranchers in central and eastern Oregon have a long history of managing wildfire threats. While there were very large fires in 2020 (e.g., Lionshead in Jefferson County burned more than 200,000 acres), for most of the eastern counties, it was a normal fire year. “Normal” means that every year wildfires burn not only private range land but also public land. Grazing permits on public land, both open range and forested areas, are an integral part of many cattle ranch operations.

West of the Cascades, there was an abnormally high number of large fires that affected not only beef cattle and dairy cattle but also other livestock. Many of the farmer/ranchers who were impacted had relatively small operations and, in many cases, they were able to move their livestock out of the path of the fires. At the same time, they often lost facilities, equipment, and very productive grazing land. Not only will they need to replace facilities, they will also need to lease land and/or purchase feed throughout normal grazing times and may be forced to sell their livestock earlier than planned.

⁶⁵ Oregon State University, Oregon Agriculture, Food and Fiber: An Economic Analysis, https://agsci.oregonstate.edu/sites/agcid7/files/main/about/oragecon_report_2021.pdf

The Oregon Department of Agriculture reports that livestock also were taken in at local community shelters, along with their farmers/ranchers. This burden was placed on local governments as FEMA shelters/funding does not cover livestock. Local governments helped provide farmers/ranchers with temporary shelter, as well as food and care of livestock during the wildfires.

3.4.1.3 Small Business Administration (SBA) Commercial Losses

The SBA offers Economic Injury Disaster Loans and Business Disaster Loans to businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations, such as public service, faith-based, and private universities, also are eligible. The law limits business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss.

There were 136 SBA business loan applications from impacted counties, totaling an estimated \$32 million in verified losses. Of these applications, only 15 loans were approved, representing \$3.3 million in total verified losses (only 11% of the applications and 9% of total verified losses). In total, around \$2 million were loaned to impacted businesses.

These data do not reflect the full population of impacted businesses as the State has assessed damages to at least 900 commercial structures and many business owners were operating out of their disaster-impacted homes. During the public hearings and public comment period for the initial Action Plan, the State received feedback from local governments and regional economic development entities – particularly in Lane and Jackson County – that many small businesses are struggling to recover from the impacts of the wildfires. They indicated there have been limited resources available to help impacted businesses, that business owners face similar insurance shortages for damaged real property as residential property owners, and that many homebased businesses are struggling to come back as they work on their home recovery.

The State will continue to work with local governments, chambers of commerce, state agencies, and other groups to understand the remaining needs of small businesses that were impacted by the Wildfires.

3.4.2 Total Business Loans Approved by the SBA

The Small Business Administration provides low-interest loans to homeowners who have suffered damage from natural disaster events in order to help the homeowner recover more swiftly. After a homeowner applies for a loan from the SBA the loan undergoes an approval process and upon approval of the loan application an amount is determined and presented to the applicant. From here the homeowner can accept the terms of the loan or decide to cancel their loan and decline the funds.

Table 53: Total Business Loans Approved by SBA

(a) Total Loans, Including Loans Cancelled by Applicants

County	Business Code/Category	Business/EIDL* Loans
Clackamas	Real Estate and Rental & Leasing	1
Columbia	Wholesale Trade	1
Jackson	Accommodation and Food Services	1
	Administrative and Support and Waste Management	1
	Construction	2
	Health Care and Social Assistance	2
	Manufacturing	2
	Other Services	1
	Real Estate and Rental & Leasing	8
	Retail Trade	2
Lane	Real Estate and Rental & Leasing	2
	Retail Trade	1
Lincoln	Real Estate and Rental & Leasing	1
Linn	Construction	1
Marion	Professional, Scientific, and Technical Services	1
	Real Estate and Rental & Leasing	2
Total	All Categories	29

* EIDL – Economic Injury Disaster Loan

(b) Total Loans, Excluding Loans Cancelled by Applicants

County	Business Code/Category	Business/EIDL* Loans
Columbia	Wholesale Trade	1
Jackson	Administrative and Support and Waste Management	1
	Construction	1
	Manufacturing	2
	Other Services	1
	Real Estate and Rental & Leasing	3
	Retail Trade	2
Lane	Retail Trade	1
Linn	Construction	1
Marion	Professional, Scientific, and Technical Services	1
	Real Estate and Rental & Leasing	1
Total	All Categories	15

* EIDL – Economic Injury Disaster Loan

3.4.3 SBA Applicant Breakdown

The table below demonstrates the relative breakdown and percentage of applications between business and home applicants. The home applicants include primary residences. Rental properties are generally included under Business loans.

Table 54: SBA Loan Breakout by Applicant

Application Type	No. of Applications	Percentage
Business/EIDL*	136	10.2%
Home	1,186	89.8%
Total	1,322	100.0%

* EIDL – Economic Injury Disaster Loan

3.4.4 Estimating Business Losses

The table below reflects information from SBA Business/EIDL applicants, and therefore does not include loss information on businesses that did not apply to SBA.

Table 55: Estimated Business Operations Losses

Operational Loss Category	No. of Businesses with Verified Losses	Average Verified Loss	Estimated Additional Losses to Businesses
Furniture	76	\$20,139	\$1,530,551
Machinery	88	\$24,319	\$2,140,067
Inventory	36	\$25,658	\$923,686
Leasehold Improvements	10	\$14,681	\$146,814

3.4.5 Increased Occupation Demands

Data not available based on unemployment claims.

3.5 Mitigation Only Activities

3.5.1 Overview

The Mitigation Needs Assessment is a risk-based assessment that summarizes the natural and human-caused threats and hazards in the eight counties most affected by the 2020 Oregon wildfires (DR-4562). The Mitigation Needs Assessment was undertaken to inform the use of the State's 15% CDBG-DR mitigation set-aside and to help build resilience and mitigation measures into recovery programs and projects.

Importantly, this assessment not only looks at wildfire risk, but also the risk of any natural hazard likely to threaten the MID areas, including flooding, volcanic, landslide, and earthquake. These hazards were identified in Oregon's Office of Emergency Management FEMA-approved [Natural Hazards Mitigation Plan, 2020 \(NHMP\)](#). Given that the plan was only recently approved and is not due to be updated for 3 years, it provides an accurate reflection of the most current hazards posed to the State.

In addition to current hazards, the Mitigation Needs Assessment considers future threats, particularly as severe weather events become more frequent and severe. In this manner, the State can ensure that it minimizes the vulnerability to the impacts of future extreme events through its recovery and mitigation projects and programs.

This assessment not only will help connect mitigation projects to current and future mitigation needs but will inform all projects undertaken through CDBG-DR such that, at a minimum, they do not exacerbate natural hazard threats and make use of scarce resources for recovery and mitigation.

As part of this assessment, the State also sought to identify and address risks to indispensable services, or those services that enable continuous operation of critical business and government functions and/or are critical to human health and safety and economic security.

3.5.2 Mitigation Needs Assessment Data and Methodology

The Mitigation Needs Assessment utilizes the findings of the NHMP, regional and local mitigation plans, and data and research from additional resources, including, but not limited to, the following:

- [American Community Surveys, 2011–2015, 2015–2019, and 2020](#)
- [Centers for Disease Control \(CDC\) Social Vulnerability Index](#)
- [Oregon Disaster Housing Recovery Action Plan](#)
- [Oregon Department of Geology and Mineral Industries](#)
- [Fourth Oregon Climate Assessment Report](#)
- Oregon Multi-Jurisdictional Hazard Mitigation Plans: [Clackamas](#), [Douglas](#), [Jackson](#), [Klamath](#), [Lane](#), [Lincoln](#), [Linn](#), and [Marion](#) Counties
- [Oregon Office of Economic Analysis](#)
- [U.S. Department of Agriculture, Forest Service](#)
- [Initial After-Action Review \(AAR\) of the June 2021 Excessive Heat Event](#)
- [Spatial Hazard Events and Losses Database for the United States](#)
- [State Natural Hazards Mitigation Plan \(NHMP\)](#)

Oregon's state-level natural hazards mitigation planning efforts are led by the Oregon DLCD. The mission and vision of Oregon's planning efforts in this area are to create a disaster-resilient State of Oregon such that natural hazard events result in no loss of life, minimal property damage, and limited long-term impacts on the economy.

[Oregon's Natural Hazards Mitigation Plan](#) provides statewide and regional information on the natural hazards most likely to occur in the State. The NHMP also reports on the potential impacts of natural hazards on people, property, and the environment, and establishes a mitigation strategy to reduce those impacts. The first Oregon NHMP was completed in 1992.

Each 5-year update to Oregon's NHMP must be approved by FEMA in order for the State to receive federal funds to carry out mitigation planning and projects. Oregon's latest NHMP was approved on September 24, 2020, as a standard plan.

It will be updated and re-approved in 2025. The State intends to take action to regain enhanced plan status during the effective life of the current NHMP.

Although the NHMP is led by DLCD, the planning process is supported by the [State Interagency Hazard Mitigation Team \(State IHMT\)](#), which includes staff from State agencies and universities involved in hazard mitigation. It provides broad oversight and policy direction for hazard mitigation in Oregon, including updating and maintaining the Oregon NHMP. OEM supports the State IHMT and manages some of the disaster mitigation funding that the State receives from the federal government.

The purpose of the Oregon NHMP Risk Assessment is to identify and characterize Oregon's natural hazards, determine which jurisdictions are most vulnerable to each hazard, and estimate potential losses to vulnerable structures and infrastructure and to State facilities from those hazards. Assessing the State's level of risk involves three components: characterizing natural hazards, assessing vulnerabilities, and analyzing risk. Characterization involves determining causes and characteristics, documenting historic events, and evaluating the future probability of occurrence while accounting for the potential shifts in probability and presentation that may manifest as Oregon's climate changes.

Regional risk assessments begin with a description of the region's natural environment, demographics, economy, infrastructure, and built environment, followed by a region-specific hazard characterization, vulnerability assessment, and risk analysis.⁶⁶

Oregon conducts a vulnerability assessment that combines information from the hazard characterization with an inventory of the existing (or planned) property and population exposed to a hazard and attempts to predict how different properties and population groups will be affected by each hazard.

Oregon also conducts a risk analysis that involves estimating the damages, injuries, and costs likely to be incurred in a geographic area over a given period. Risk analysis has two measurable components: (1) the magnitude of the harm that may result, defined through vulnerability assessments, and (2) the likelihood or probability of the harm occurring. For the 2020 Oregon NHMP update, the State risk assessment has been reorganized to flow from the discussion of hazards directly into the discussion of

⁶⁶ Oregon Department of Land Conservation and Development, Natural Hazards Mitigation Plan, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_02_ExecSum.pdf, p. 68

vulnerability, and then, for the first time, for the two to culminate in a brief discussion of risk.⁶⁷

The State uses a scoring worksheet during the risk assessment of natural disasters, referred to as the [OEM-FEMA Hazard Analysis Methodology](#).

Based on the above scoring worksheet, natural disaster hazards are ranked based on probability, impact, and community vulnerability. The following table provides the risk assessment of disaster types in the 2020 disaster-impacted counties:

Table 56: Local and State Vulnerability Ranking by County

County	Drought		Earthquake		Volcanic		Landslide		Wildfire		Flood		Windstorm		Winter Storm		Extreme Heat	
	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State
Clackamas	L	VL	H	VL	M	L	L	H	M	VL	M	VL	L	L	M	M		L
Douglas - Central	L	H	H	H	-	M	L	H	H	H	M	H	M	M	M	M		H
Douglas - Coastal	L	H	H	VH	-	M	M	H	M	M	H	H	H	M	L			

⁶⁷ Oregon Department of Land Conservation and Development, Natural Hazards Mitigation Plan, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_02_ExecSum.pdf

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County	Drought		Earthquake		Volcanic		Landslide		Wildfire		Flood		Windstorm		Winter Storm		Extreme Heat	
	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State	Local	State
Jackson	M	H	H	H	L	M	L	H	M	M	M	VH	M	H	M	H		M
Klamath	H	VH	H	VH	M	H	L	H	H	VH	M	H	-	-	M	M		H
Lane - Central	L	M	M	L	L	H	M	M	M	M	M	M	H	M	H	H		H
Lane - Coastal	-	M	-	VH	-	L	-	H	-	M	-	M	-	H	-	L		
Lincoln	M	M	H	VH	L	L	H	VH	L	L	M	L	H	H	M	-		M
Linn	L	H	H	VH	M	H		M	M	H	M	M	M	M	H	H		H
Marion	H	VH	H	VH	L	VH	H	H	M	VH	H	H	L	H	H	H	M	H

Notes for Table:

Local = Local Hazards Mitigation Plan; H = High vulnerability, M = Moderate vulnerability, and L = Low vulnerability

State = State Natural Hazards Mitigation Plan; VH = Very high vulnerability, H = High vulnerability, M = Moderate vulnerability, L = Low vulnerability, and VL = Very low vulnerability

While the NHMP identifies 11 natural hazards threatening the State as a whole, the risk of many, including tsunami and coastal hazards, vary widely throughout the State. For this reason, this Action Plan will focus on the top nine hazards in the eight affected counties. These include wildfire, flooding, earthquake, winter storm, landslide, drought, volcanic, windstorm, and extreme heat. Because of the location of the burn scar areas in the MID areas, the State did not include coastal erosion and volcanic hazards in its Mitigation Needs Assessment.

3.5.2.1 Local Hazards Mitigation Plans

Local hazards mitigation plans identify the most likely and impactful hazards in each community, as well as appropriate emergency actions in the event of a significant disaster event and mitigation measures to lessen the impact of future disasters.

In Oregon, most counties are required to update their Natural Hazards Mitigation Plan every 5 years, whereas multi-jurisdictional natural hazards mitigation plans use a different methodology, based on the local conditions and needs of their community. Some plans use a qualitative rating system based on past natural hazard data and future projections, while other natural hazards mitigation plans rely more heavily on qualitative data compiled from geological surveys, public engagement sessions, and on-the-ground observations.

Table 57 provides links to the most recent county hazards mitigation plans for the eight impacted counties. Each of these local hazards mitigation plans was current at the time of the 2020 Wildfires.

Table 57: Local Hazard Mitigation Plans

Hazard Mitigation Plan (HMP)	Link to Local Plan	Date
Douglas County Local NHMP, Volume II	Douglas	2016
Marion County Multi-Jurisdictional HMP	Marion	2017
Jackson County Multi-Jurisdictional NHMP	Jackson	2018
Linn County Multi-Jurisdictional NHMP	Linn	2017
Lincoln County Multi-Jurisdictional NHMP	Lincoln	2020
Lane County Multi-Jurisdiction HMP	Lane	2018
Clackamas County Multi-Jurisdictional HMP	Clackamas	2019
Klamath County Multi-Jurisdictional NHMP	Klamath	2017

Most counties include a risk assessment in their Natural Hazards Mitigation Plan to identify disaster types by the level of risk, from high risk to low risk. This assessment is generally

based on the frequency and impact of disaster events. In Table 58, you can see the most common categorizations of disaster type by risk level in the MID areas.

Table 58: Oregon Hazards Data Table by Threat Tier

High-Risk Threat	Medium-Risk Threat	Low-Risk Threat
Wildfire	Landslide	Volcanic
Earthquake	Drought	Tsunami
Winter Storm	Windstorm	Coastal Erosion
Flooding		

Furthermore, counties prioritize the probability of disaster event occurrence and vulnerability of the community to that hazard. Table 59 categorizes all disaster types by their risk rating based on probability and vulnerability by county.

Table 59: Hazard Threat Level, by County

Hazard								
County	Wildfire	Earthquake	Winterstorm	Flood	Landslide	Drought	Windstorm	Volcanic
Douglas	High	High	Moderate	High	Low	High	Very Low	Very Low
Marion	Moderate	High	Low	High	Moderate	High	Low	Low
Jackson	High	High	High	Moderate	Low	Moderate	Moderate	Low
Linn	Moderate	High	High	High	Moderate	Low	Moderate	Medium
Lincoln	Moderate	Moderate	High	Moderate	High	Low	High	Low
Lane	High	Moderate	High	High	Moderate	Low	High	Low
Clackamas	High	High	High	Moderate	Low	Moderate	Moderate	Medium
Klamath	High	High	Low	High	Moderate	High	Very Low ⁶⁸	Medium

3.5.3 Top Risks Impacting the HUD Most Impacted and Distressed Areas

Of the 11 hazard types impacting the State according to the NHMP, nine have been deemed as posing the most significant risk to the MID counties. These include wildfire, flood, earthquake, winter storm, landslide, drought, volcanic, windstorm, and extreme heat. Coastal hazards were excluded from this analysis as the burn scar areas and MID areas have zero or low risk of coastal flooding. Likewise, volcanic hazards were excluded

⁶⁸ State of Oregon, Natural Hazards Mitigation Planning,
<https://www.oregon.gov/lcd/NH/Pages/Mitigation-Planning.aspx>

as only Lane, Lincoln, and Marion counties are among the counties deemed vulnerable by the Oregon Department of Geology and Mineral Industries (DOGAMI).

The sections below provide an overview of the natural hazards affecting the MID counties, including information related to previous occurrences and their magnitude and impacts, as well as the probability of future hazard events, usually expressed in recurrence intervals.

3.5.3.1 Wildfires

A wildfire is an uncontrolled burning of grasslands, brush, or woodlands. The potential for wildfires depends on the surface fuel characteristics, recent climate conditions, current meteorological conditions, and fire behavior. Hot, dry summers and dry vegetation increase the susceptibility to fire in the fall, which is a particularly dangerous time of year for wildfires.

Fire is an essential part of Oregon's ecosystem but it also can pose a serious threat to life and property, particularly in the State's growing rural communities. Wildfires can be divided into three categories: interface, wildland, and firestorms. Wildland-urban interface (WUI) communities are areas where structures and other human development meet or intermingle with natural vegetative fuels. The increase in residential development in WUI areas has resulted in greater wildfire risk. Fire has historically been a natural wildland element and can sweep through vegetation that is adjacent to a combustible home.

Oregon experienced its most devastating series of wildfires in recorded history in early fall 2020. On September 15, 2020, a federal disaster declaration was declared for Clackamas, Douglas, Jackson, Klamath, Lane, Lincoln, Linn, and Marion counties. Oregon OEM reported that more than 4,200 homes were destroyed, including 1,795 manufactured housing units, based on damage assessments that the agency collected from each of the eight FEMA IA-declared counties (DR-4562).

The 2020 and 2021 Oregon wildfires across the State may prompt Klamath, Lincoln, Linn, and Marion counties to elevate wildfires to a high-level threat in their next NHMP update. In 2020, the Beachie Creek and Lionshead wildfires in Marion County destroyed 633 homes, accounting for nearly 40% of the annual residential building permits from 2019; in Lincoln County, the Echo Mountain Complex Fire destroyed 288 homes or 88% of the 2019 residential building permits. The extensive wildfire destruction and damage across all eight counties exacerbated the existing housing shortage in Oregon.

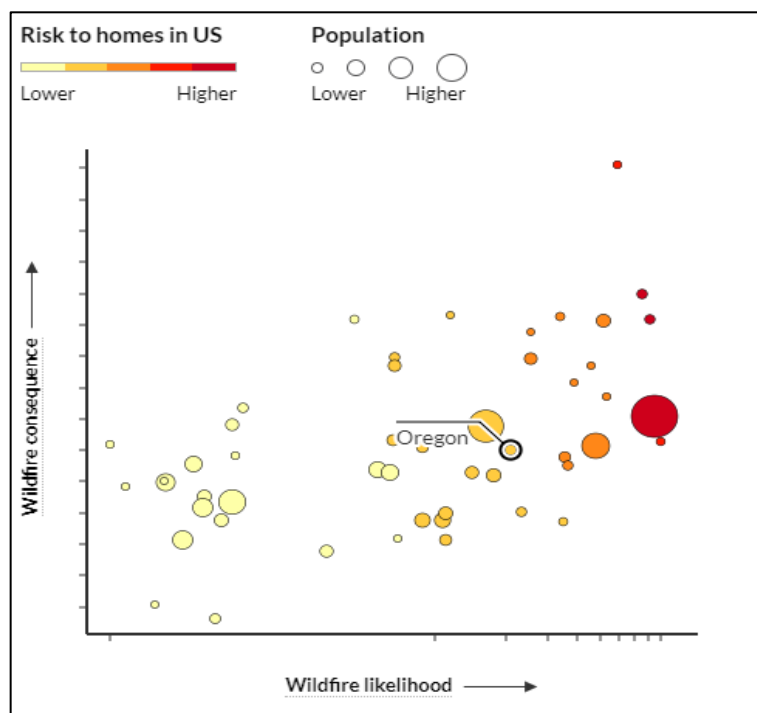
Table 60: Recent History of Wildfires in Oregon

Year	County	Fire/Disaster Name	Damage Summary
2002	Josephine	Biscuit Fire	Destroyed four homes and 10 additional structures.
2010	Jackson	Oak Knoll Fire	Destroyed 11 structures.
2014	Wallowa	Buzzard Complex	Primarily impacted rangeland and cattle farms.
2014	Grant	South Fork Complex	Burned 62,476 acres.
2015	Grant	Canyon Creek Complex	Destroyed 43 homes and almost 100 other structures.
2015	Wallowa	Grizzly Bear Complex	Destroyed two homes and dozens of other structures.
2020	Multiple Counties	Multiple Names/DR-4562	Destroyed more than 4,300 homes.
2021	Multiple Counties	Patton Meadow and Bootleg Fires	Destroyed more than 400 structures.

According to the USDA Forest Service, **populated areas in Oregon have, on average, a greater wildfire risk to homes than nearly 70% of other states** (see Figure 13). This presents multiple challenges for the State, including rising insurance costs, increasing State government outlays for recovery, and damages to underlying public infrastructure.⁶⁹

The level of fire activity is strongly correlated to summer climate as the largest fires generally occur

Figure 13: Oregon's Relative Wildfire Risks to Homes



Source: USDA, Forest Service, Wildfire Risk to Communities, 2021.

⁶⁹ USDA, Forest Service, Wildfire Risk to Communities (2021), <https://wildfirerisk.org/download/>

during warm and dry summers. Oregon's increasing wildfire risk in the face of climate change has caused an increase in catastrophic fires over the past several years. According to the Fourth Oregon Climate Assessment Report (2019), in a changing climate, fire activity in Oregon will continue to be influenced by warming temperatures and longer fire seasons. More frequent and intense wildfires are likely to damage larger areas, posing a greater risk to Oregon's housing stock.

Immediately following the fires, Oregon State agencies and federal partners created erosion threat reports related to the 2020 Wildfires. The Erosion Threat Assessment and Reduction Team (ETART) is a multi-jurisdictional and multi-agency team, led by FEMA and the State of Oregon, charged with the assessment of potential erosion risks and providing control treatment recommendations. This group of subject matter experts coordinated with federal, State, and local fire response teams as an early statewide recovery action.

This ETART team identifies risks and threats such as soil erosion, flooding potential, hazard trees, and ecological impacts associated with each fire. Local and State jurisdictions will evaluate the findings through the filters of need, feasibility, and cost to prioritize recovery projects and inform funding decisions.

ETART summaries and full reports for the Beachie Creek, Archie, Holiday Farm, and Riverside fires are available at <https://wildfire.oregon.gov/NCrecovery>

3.5.3.2 Flooding

Flooding is the most common environmental hazard affecting the United States, likely due to the widespread geographical distribution of river valleys and coastal areas and the attraction of human settlements to these areas. The most recent presidentially declared disasters have been associated with flash floods and general flooding.

Flooding is a localized hazard that generally results from excessive precipitation. Floods are generally considered to fall into one of two categories: flash floods that are the product of heavy localized precipitation occurring within a short period of time at a given location and general floods caused by large-scale weather systems that generate prolonged rainfall or rain-on-snow events that result in large amounts of runoff over a longer period across one or more river basins.⁷⁰ Other sources of flooding include flash floods associated with locally intense thunderstorms, channel migration, ice, or debris jams, and, much less frequently, dam failures.

⁷⁰ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASState.pdf, p. 173

Floods are a common and widespread natural hazard in Oregon as evidenced by the State's extensive history of flooding. Oregon's deadliest recorded flood occurred in Heppner in 1903 when a June 14 storm dropped 1.5 inches of rain within a 20-minute period. The storm was centered in the headwaters area of Willow Creek above Heppner in northeastern Oregon. Within minutes, a 5-foot wall of water and debris poured through Heppner, ripping homes from their foundations and resulting in 247 deaths.

Another late spring flood in 1948 is best remembered for destroying the entire city of Vanport (now Delta Park). Record flow levels on the Columbia River caused the structural failure of a dike, leaving the entire town of almost 19,000 homeless.

Additional floods of record in Oregon occurred in December 1964 and January 1965 during the "Christmas Flood." Damage from these floods totaled more than \$157 million and resulted in 20 deaths. From December 20 through 24, 1964, the most severe rainstorm to occur in central Oregon and one of the most severe west of the Cascades left many areas with two-thirds of their normal annual rainfall in just 5 days. The ensuing floods destroyed hundreds of homes and businesses, forced the evacuation of thousands of people, destroyed at least 30 bridges, and washed away hundreds of miles of roads and highways.

A similar flood event occurred in February 1996. Following an extended period of unseasonably cold weather and heavy snowfall in the Pacific Northwest, warming temperatures and rain began thawing the snowpack and frozen rivers throughout Oregon. On February 6, a strong subtropical jet stream or "Pineapple Express" reached Oregon. This warm, humid air mass brought record rainfall amounts, quickly melting the snowpack and swelling at least 25 rivers to flood stage. Many channels reached flood levels comparable to those reached during the 1964 flood. Of Oregon's 36 counties, 27 were eventually covered by a presidentially declared disaster due to this event, with statewide damages totaling more than \$280 million.⁷¹

Table 61 provides information on recent flooding events in the MID counties.

Table 61: Recent Flooding Events in the Most Impacted and Distressed Counties

Date	Location	Event
October 2017	Clackamas County	A potent atmospheric river brought strong winds to the north Oregon coast and coast range on October 21, causing heavy rain for some locations along the north Oregon coast and coast range, with Lees Camp receiving upwards of 9 inches.

⁷¹ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASState.pdf, p. 255

Date	Location	Event
		Runoff prompted the earliest significant Wilson River flood on record, as well as flooding on several other rivers in the area.
June 2018	Lane County	In Lane County, an upper-level trough moved across the area from the southwest, generating strong thunderstorms that produced locally heavy rainfall, lightning, hail, and gusty winds. Thunderstorms with heavy rainfall developed over southwest Baker County on June 20, leading to flash flooding and debris flow on the areas left burn scarred by the Rail and Cornet-Windy Ridge fires.
February 2019	Douglas and Lane Counties	DR-4432: Very heavy rain, along with the melting of recent snowfall, caused flooding at several locations in southern Oregon in late February. Deer Creek at Roseburg, the South Fork of the Coquille at Myrtle Point, the North Fork of the Coquille at Myrtle Point, the Coquille River at Coquille, and the Rogue River at Agness all exceeded flood stage. ⁷²

As severe weather events become more frequent and severe, western Oregon basins, in particular, are projected to experience increased precipitation, including extreme precipitation, which is likely to result in increased extreme river flows in future decades. It is very likely (> 90%) that Oregon will experience an increase in the frequency of extreme precipitation events (high confidence). It also is very likely that Oregon will experience an increase in the frequency of extreme river flows (high confidence).

3.5.3.3 Earthquakes

An earthquake is a vibration or shaking of Earth's surface due to an underground release of energy. They can be caused by various conditions, such as sudden movements along geological faults or volcanic activity. Earthquake magnitudes, or severity, are recorded on the Richter scale with seismographs. Some may be so minor that they are virtually unnoticed, while others can destroy entire cities. Seismology, the study of earthquakes, helps scientists understand what areas are more prone to experiencing earthquakes, such as along active fault lines and along the Pacific coast; however, earthquakes are generally unpredictable.⁷³

⁷² State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASState.pdf, p. 262

⁷³ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASState.pdf, p. 487

Earthquakes are infrequent and unpredictable. In Oregon, the Cascadia Subduction Zone may produce an earthquake of 8.0 magnitude or higher. And while there has not been a major Cascadia Subduction Zone earthquake in Oregon in more than four centuries, an earthquake's size, force, suddenness, and potential to cause catastrophic damage and disruption make for a potent natural hazard.

The table below, based on data gathered in the State's Natural Hazards Mitigation Plan, presents the frequency, location, and magnitude of seismic events in Oregon. The most recent such event occurred in 2001 in Nisqually, Washington.

Table 62: Frequency, Location, and Magnitude of Seismic Events in Oregon

Date	Location	Magnitude (M)
Approximate Years: 1400 BCE, 1050 BCE, 600 BCE, 400, 750, 900	Offshore, Cascadia Subduction Zone	Probably 8.0–9.0
January 1700	Cascadia Subduction Zone	About 9.0
October 1877	Portland Area, Oregon	5.2
February 1892	Portland Area, Oregon	5.0
December 1941	Portland Area, Oregon	4.5
April 1949	Olympia, Washington	7.1
December 1953	Portland Area, Oregon	4.5
November 1961	Portland Area, Oregon	5.0
November 1962	Portland Area, Oregon	5.5
December 1963	Portland Area, Oregon	4.5
March 25, 1993	Scotts Mills, Oregon	5.6
February 2001	Nisqually, Washington	6.874F ⁷⁴

The Oregon Department of Geology and Mineral Industries (DOGAMI) developed two earthquake loss models for Oregon based on the two most likely sources of seismic events: (1) an M6.5 arbitrary crustal event, and (2) a 2,500- year mean return period probabilistic earthquake scenario (2,500-year Model). Both models are based on Hazus-MH, software currently used by the Federal Emergency Management Agency (FEMA) as a means of determining potential losses from earthquakes and other hazards.

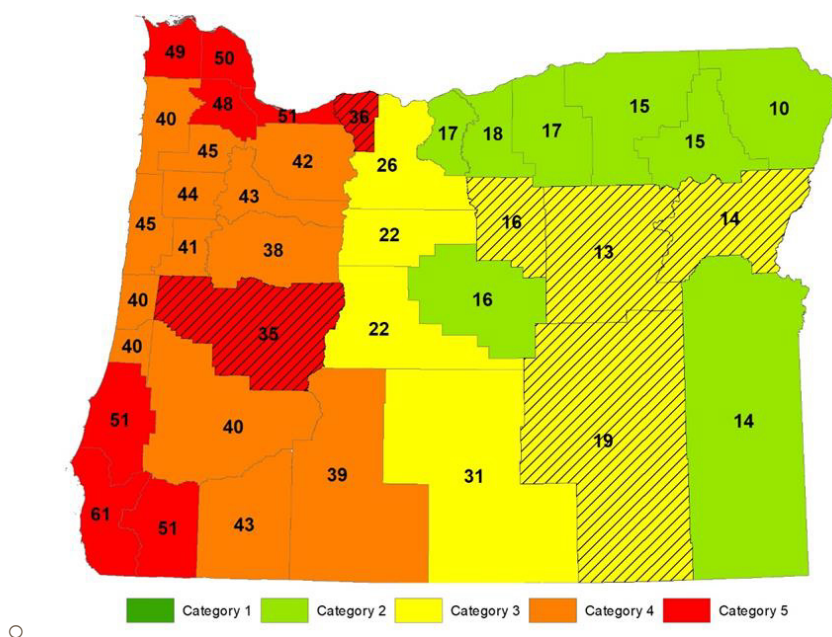
⁷⁴ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASState.pdf, p. 220

The arbitrary crustal event is based on a potential M6.5 earthquake generated from an arbitrarily chosen fault using the Hazus software, and assuming a worst-case scenario. The 2,500-year crustal model does not look at a single earthquake (as in the CSZ model); it encompasses many faults, each with a 2% chance of producing an earthquake in the next 50 years. The model assumes that each fault will produce a single “average” earthquake during this time.

DOGAMI investigators caution that the models contain a high degree of uncertainty and should be used only for general planning purposes. Despite their limitations, the models do provide some approximate estimates of damage⁷⁵.

The following image depicts the 2020 Oregon Earthquake Probability Ranking Based on Mean County Value of the Probability of Damaging Shaking and Presence of Newly discovered faults:

Figure 14: 2020 Oregon Earthquake Probability Ranking ⁷⁶



⁷⁵ State of Oregon, State Risk Assessment, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_05b_RASState.pdf, p. 223

⁷⁶ Oregon Department of Geology and Mineral Industries, Earthquake regional impact analysis (2020), <https://www.oregongeology.org/pubs/ofr/p-O-20-01.htm>

As the graphic indicates, each of the seven MID counties have at least a 32% chance of damaging shaking during the next 100 years. Note that counties with hatching had their probability category increased one step due to newly discovered faults.

3.5.3.4 Winter Storms

Winter storms are characterized by ice accumulation and freezing rain, heavy snowfall, and/or extreme cold and wind chill conditions. Impacts are determined by factors such as the amount and extent of snow or ice, air temperature, wind speed, event duration, and day and time. These hazard events typically create a disruption of regional systems, such as public utilities, telecommunications, and transportation routes.

An ice storm is used to describe occasions when ice accumulations damage trees and aboveground utility lines and affect travel surfaces. Heavy snowfall can cause extended periods of travel disruption and damage to structures. Exposure to the extreme cold and wind chill associated with winter storms can be life threatening and plumbing pipes can freeze or burst.

Winter storms, while more frequent than other hazards, also are more concentrated, with fewer statewide or regional events. The following table describes recent winter storm events from 2010 to the present.

Table 63: Winter Storm Events: 2010 to Present

Date	Location	Description
Nov. 29–30, 2010	Hood River and Wasco Counties	4–5 inches of snow reported in Cascade Locks and Hood River; 0.5 inch of ice in Corbett.
Jan. 12–18, 2012	Hood River and Wasco Counties	4.5 inches of new snow reported in Hood River; I-84 closed due to ice and snow east of Troutdale.
Feb. 6–10, 2014	Hood River County	A strong winter storm system affected the Pacific Northwest, bringing a mixture of arctic air, strong easterly winds, significant snowfall, and freezing rain to several counties in northwestern Oregon.
Feb. 11–14, 2014	Hood River County	2–7 inches of heavy rain fell across many counties in western Oregon, which, combined with warm temperatures, led to snowmelt and rainfall runoff that produced rapid rises on several rivers, including flooding on three rivers in northwestern Oregon.
Mar. 2, 2014	Hood River County, Upper Hood River Valley, and	Easterly winds brought cold air from east of the Cascades through the Columbia River Gorge as a moist front pushed in from the Pacific. The combination of a cold air mass and frontal precipitation resulted in

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Date	Location	Description
	Central Columbia River Gorge	approximately 6–8 inches of snow, as well as a quarter of an inch of ice on top of the snow in Hood River and White Salmo, and as much as 0.4–0.5 inch of ice in Parkdale.
Nov. 13, 2014	Hood River County (Western Columbia River Gorge)	Sleet and freezing rain created hazardous commutes for tens of thousands of persons in the western and eastern suburbs of Portland. Snow accumulations were primarily restricted to the Cascade valleys and the central Columbia River Gorge. Spotters reported around 6–8 inches of snow in the Cascade Foothills, followed by 0.25 inch of ice. A combination of heavy snow and ice resulted in slick driving conditions for the western Columbia River Gorge. Areas in the gorge measured a quarter of an inch of ice, whereas other areas had 5–8 inches of snow.
Dec. 6–23, 2015	Statewide Storm Events	DR-4258: Clatsop, Columbia, Multnomah, Clackamas, Washington, Tillamook, Yamhill, Polk, Lincoln, Linn, Lane, Douglas, Coos, and Curry counties were presidentially declared disasters. Several Pacific storm systems moved across the region over the December 12–13 weekend. Each storm system brought several inches of snow to the mountain areas.
Dec. 8, 2016	Hood River County (Western Columbia River Gorge)	A strong frontal system brought strong easterly winds to the North Willamette Valley and a mix of snow, sleet, and freezing rain down to the valley floor. Ice accumulations were higher in the West Hills and near the Columbia River Gorge. ⁷⁷
February 2021	Statewide Storm Events	Significant ice/snow event caused the largest power outage in Oregon history. Over 300,000 were without power, some were without power for up to a week. There was significant property and power line damage from downed trees.

There is no current research available regarding changes in the incidence of winter storms in Oregon due to changing climate conditions. However, the warming climate is likely to result in less frequent extreme cold events and high-snowfall years.

⁷⁷ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RARegAll.pdf, p. 564

Within the Oregon, northeast communities are known for cold winter conditions. This region is the commodity flow route to eastern Oregon. With long road closures, these communities suffer from loss of traffic and revenue. Drifting, blowing snow and windy and icy conditions have forced highway closures along Oregon's principal east-west transportation route, I-84, for hours. In such situations, travelers must seek accommodations, sometimes in communities where lodging is very limited. Access to farms and ranches can be extremely difficult and present a serious challenge for local emergency managers.

Winter storms, particularly east of the Cascades where snowstorms are typically more intense, bring larger amounts of snow and last longer. They can strand livestock in pastures, leaving them without food and water and exposed to extreme cold for long periods of time. Consequently, substantial losses of livestock from starvation, dehydration, and freezing significantly impact producers and State and local economies. In addition, water quality and health hazards develop when dead livestock are not retrieved until roads are cleared and vehicles can be used to remove the carcasses. Livestock buried under snow may not be found until the snow melts, carrying the carcasses to streams and floodways.⁷⁸

3.5.3.5 Landslides

A landslide is one of the most common and devastating geologic hazards in Oregon. A landslide is a downward movement of earth or rock driven by gravity. Landslides can be triggered by natural or human-caused circumstances, such as heavy rains, earthquakes, volcanoes, rapid snow melt, erosion, construction, and other human activity. Average annual repair costs for landslides in Oregon exceed \$10 million, with individual severe winter storm losses often exceeding \$100 million. As population growth continues to push new development into landslide-susceptible terrain, greater losses are likely to occur.

Three main factors influence an area's susceptibility to landslides—the geometry of the slope, geologic material, and water—and some geologic formations are more susceptible to landslides than others. In general, locations with steep slopes are most susceptible to landslides, and landslides occurring there tend to move more rapidly and pose greater life safety risks.⁷⁹

The following table describes major landslides in Oregon since 1964.

⁷⁸ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RAREgAll.pdf, p. 693

⁷⁹ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RAREgAll.pdf, p. 747

Table 64: Major Landslides in Oregon Since 1964

Date	Location	Description
December 1964	Crook, Deschutes, Jefferson, Klamath, Lake, and Wheeler Counties	DR-184
September 1993	Klamath County	Rockslide resulting from earthquake; one death
December 1996 – January 1997	Lake and Wheeler Counties	DR-1160
May – June 1998	Crook County	DR-1221
December 2003 – January 2004	Crook, Deschutes, Jefferson, Lake, and Wheeler Counties	DR-1510
December 2005	Jefferson County	Damages: \$11,666.67 (includes Sherman and Wasco Counties)
December 2005 – January 2006	Crook, Jefferson, and Wheeler Counties	DR-1632
December 2006	Wheeler County	DR-1683
January 2011	Crook County	DR-1956
January 2017	Deschutes County	DR-4328
February 2019	Jefferson County	DR-4432 ⁸⁰

Although it is difficult to predict exactly where and when a landslide will occur, these events are triggered by heavy rainfall events when the soil becomes saturated or following a seismic event. Given that they occur in every county in Oregon, there is a 100% probability of landslides occurring in the impacted region in the future.

It is **very likely** (> 90%) that Oregon will experience an increase in the frequency of extreme precipitation events (**high confidence**). Because landslide risk depends on a variety of site-specific factors, it is **more likely than not** (> 50%) that climate change, through the increasing frequency of extreme precipitation events, will result in an increased frequency of landslides.⁸¹

⁸⁰ Center for Emergency Management and Homeland Security, Spatial Hazard Events and Losses Database for the United States, <https://cemhs.asu.edu/sheldus>

⁸¹ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RAREgAll.pdf, p. 754

3.5.3.6 Drought

A drought is a prolonged period of less-than-normal precipitation such that the lack of water causes a serious hydrologic imbalance. Common effects of drought include crop failure, water supply shortages, and fish and wildlife mortality. High temperatures, high winds, and low humidity can worsen drought conditions and make areas more susceptible to wildfires. Human demands and actions can hasten or mitigate the drought-related impacts on local communities.⁸²

The following table provides an historical view of drought events in Oregon, beginning with Oregon's impacts from the infamous Dust Bowl through more frequent and recurring drought events.

Table 65: Drought Events in Oregon

Date	Location	Description
1929–1931	Regions 1–3 and 5–7 (1929–1930); Regions 6 and 7 (1930–1931) (Extreme Drought)	In the 1920s and 1930s, these regions were more commonly known as the “Dust Bowl” as they were experiencing a period of prolonged, mostly drier than normal conditions across much of the State and country. Moderate to severe drought affected much of the State.
1939	Statewide	
1977	Northern & Southern Central and Eastern Oregon	Significantly drier than normal year with temperatures near normal.
1994	Regions 4–8	The Governor's drought declaration covered 11 counties.
2001	Southern and Eastern Oregon	18 counties, including Jefferson, Wheeler, Crook, Deschutes, Klamath, and Lake, were placed under a Governor-declared drought.
2002	Southern and Eastern Oregon	The 18-county declaration remained in effect with the Governor adding five counties, bringing the total to 23 counties.
2003	Southern and Eastern Oregon	Jefferson, Deschutes, and Lake counties' drought declarations expired on June 23, 2003. The Governor issued new drought declarations for Wheeler and Crook

⁸² State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RAREgAll.pdf, p. 755

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Date	Location	Description
		counties and extended the Klamath County drought order through December 2003.
2004	Eastern Oregon	Klamath County was placed under a Governor-declared drought; three other counties were declared in neighboring regions.
2005	Regions 5–7	The Governor declared a drought in Wheeler, Crook, Deschutes, Klamath, and Lake counties. All Region 5 counties were declared, as well as two counties in Region 7.
2007	Regions 6–8	The Governor declared a drought in Lake County, along with five other counties in Regions 6 and 7.
2010	Region 6	The Governor declared a drought in Klamath and “contiguous counties.”
2012	Region 6	The Governor declared a drought in Lost River Basin only, located within Klamath and Lake counties.
2013	Regions 5–8	The Governor declared a drought in Klamath County, along with four other counties.
2014	Regions 4 and 6–8	The Governor declared a drought in 10 counties, including Crook, Wheeler, Klamath, and Lake counties.
2015	Statewide	All 36 Oregon counties received federal drought declarations, including 25 counties under the Governor’s drought declarations.
2018	Regions 1 and 4–8	Klamath, Lake, and Wheeler counties received the Governor’s drought declarations, including eight other counties in five other regions. ⁸³

⁸³ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RAREgAll.pdf, p. 1141

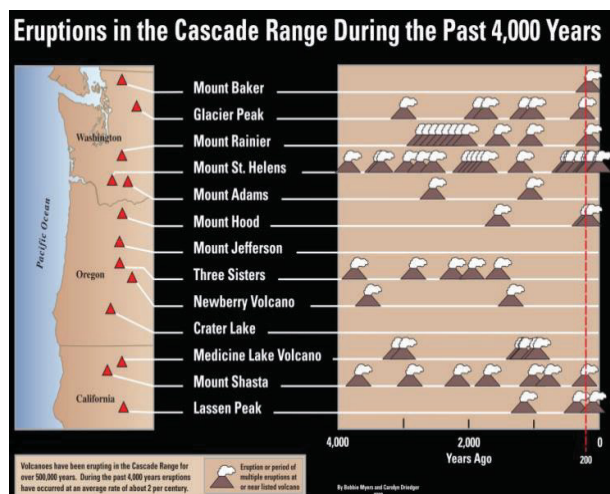
Climate change has brought longer and more severe droughts to the Pacific Northwest. Prior to the 2020 Wildfires, all MID counties experienced moderate to extreme drought. The buildup of dry brush over the previous several years contributed to the extreme intensity of wildfires throughout all eight disaster-declared counties. Continued drought in residential communities across Oregon threatens to exacerbate the housing vulnerability throughout Oregon, particularly in the disaster-declared counties

3.5.3.7 Volcanoes

Volcanoes are a potentially destructive natural hazard resulting from magma ascending to and then erupting from the earth's surface. Volcanic eruptions are usually isolated around a single vent area; however, their explosivity and effects can vary widely. While volcanic risk varies across the State, largely based on the proximity to Cascade Range volcanoes, all MID area counties, except for Lincoln County, were deemed by DOGAMI to have at least a moderate risk.

Potentially hazardous volcanoes in Oregon are present along the crest of the Cascade Range and to a lesser extent in the High Lava Plains, presenting significant hazards to communities within the region. The Cascade Range extends southward from British Columbia into northern California and its volcanoes are a result of the interaction of tectonic plates along the Cascadia Subduction Zone. The eruption of Washington State's Mount St. Helens in 1980 and subsequent activity demonstrate both the power and catastrophic consequences that Cascade-type volcanoes can have on the region.

Figure 15: Eruptions in the Cascade Range During the Past 4,000 Years



Source: Eruptions in the Cascade Range During the Past 4,000 years⁸⁴

⁸⁴ USGS, Eruptions in the Cascade Range during the past 4,000 years, <https://pubs.er.usgs.gov/publication/gip63>

In Oregon, volcanic hazards can have far-reaching consequences, which are categorized as “proximal” or “distal,” based on the range of their impact relative to the eruptive center or active vent. Proximal hazards are those occurring within 30 miles of the active vent and include lava flow; pyroclastic flows, which include very hot ash, lava, and gases; lahars, or volcanic mud and debris flows; debris avalanches and landslides; release of volcanic gases; and showers of ejected rock fragments called “tephra.”

While slow-moving and generally not life-threatening, lava flows can burn, crush, or bury objects in their path and disrupt local streams. Conversely, pyroclastic flows and tephra can move at speeds up to 150 mph, burning or crushing wood and other combustible materials and crushing structures such as homes and indispensable services in their path. In addition to the threat of being burned or crushed, these eruptive hazards can also result in life-threatening gases and should prompt the evacuation of affected areas.

Distal hazards include lahars, eruption columns, and clouds that can extend hundreds of miles, and ashfall that can affect air quality, impede road and air travel, and accumulate in sufficient quantities to collapse roofs. In addition to proximal and distal hazards, other non-eruptive hazards, such as earthquakes, flooding, and landslides, can result from volcanic activity.

Unlike other geologic hazards, such as earthquakes and tsunamis, certain precursors often foreshadow volcanic activity, such as heat output, volcanic gases, ground movements, and earthquakes. Scientists use these clues to recognize a restless volcano and to prepare for the events that may follow. Lessons learned at Mount St. Helens led the U.S. Geological Survey (USGS) to establish the Cascades Volcano Observatory (CVO) in Vancouver, Washington. Scientists at CVO continually monitor volcanic activity within the Cascade Range and study the geology of volcanic terrains in Oregon in cooperation with DOGAMI. USGS currently characterizes six Oregon volcanoes—Mount Hood, Crater Lake, Newberry, South Sister, Middle Sister, and North Sister—as “high to very high” threats.

While it is difficult for geologists to supply a timeline particular to volcanic activity and USGS stresses the uncertainty and limitations in forecasting eruptions, DOGAMI made use of open-file reports to understand the odds of certain events taking place at particular volcanoes and assigned a volcanic hazard probability score of 3 out of 5 to all MID areas, except for Lincoln County.

Table 66: Notable Geologic Events Near Mount Hood

Date or Age	Event	Deposits
1859, 1865, 1907(?)	Minor explosive eruptions of Mount Hood	Scattered pumice
Late 19th century	Late neoglacial advance	Prominent, sharp-crested moraines
Late 18th century	Old Maid eruptive period	Lava dome, pyroclastic flow and lahar deposits, tephra
About 500 years ago	Debris flows in Zigzag River	Debris flow deposits
1,000 years ago	Debris flows in upper Sandy River	Debris flow deposits
1,500 years ago	Timberline eruptive period	Lava dome, pyroclastic flow and lahar deposits, tephra
7,700 years ago	Eruptions from vent near Parkdale; Mount Mazama ashfall	Basaltic andesite of Parkdale lava flow; about 5 cm of Mazama ash
11,000 to 20,000 years ago	Waning phases of Evans Creek glaciation	Moraines
13,000 to 20,000 years ago	Polallie eruptive period	Lava domes, pyroclastic flow and lahar deposits, tephra
20,000 to 25,000 years ago	Maximum of Evans Creek glaciation	Belts of moraines in most valleys
20,000 to 30,000 years ago	Mount Hood dome eruptions	Lava domes, pyroclastic flow and lahar deposits
30,000(?) to 50,000(?) years ago	Mount Hood lava flow eruptions	Andesite lava flows of Cathedral Ridge and Tamanawas Falls

3.5.3.8 Windstorms

In the northwestern region of the United States, windstorms typically involve sustained winds of more than 50 mph, with less frequent events exceeding 80 mph. Windstorms can affect any region of the State but have a higher prevalence along the coastline and coastal headlands. Windstorms are especially dangerous in areas with tree coverage, exposed

property, major infrastructure, and aboveground utility lines, where they result in downed trees, power outages, and damage to roofs and outbuildings.⁸⁵

Rotational windstorms, commonly referred to as tornados, dust devils, or waterspouts, occur with lower frequency in Oregon. These are typically short duration, localized events that can present public safety hazards and damage.

The following table outlines recorded windstorm events with notable impacts.

Table 67: Historical Windstorm Events

Date	Location of Impact	Summary	Damage
March 1971	Most of Oregon	Notable damage in Newport	Falling trees damaged power lines, building damage
January 1986	Northern and central Oregon coast	75-mph winds	Damaged trees, buildings, and power lines
January 1987	Oregon coast	Wind gusts to 96 mph at Cape Blanco	Significant erosion to highways and beaches, several injuries
December 1987	Oregon coast / northwestern Oregon	Winds on the coast, 60 mph	Trees uprooted
March 1988	Northern and central coast	Wind gusts, 55–75 mph	One death near Ecola State Park, uprooted trees
January 1990	Statewide	100-mph winds in Netarts and Oceanside	One death, damaged buildings, falling trees (FEMA DR-853-OR)
February 1990	Oregon coast	Wind gusts of 53 mph at Netarts	Damage to docks, piers, and boats
January 1991	Most of Oregon	Winds of 63 mph at Netarts, 57 mph at Seaside	75-foot trawler sank northwest of Astoria
November 1991	Oregon coast	Slow-moving storm, 25-foot waves offshore	Buildings and boats damaged, transmission lines down

⁸⁵ State of Oregon, Regional Risk Assessments, https://www.oregon.gov/lcd/NH/Documents/Approved_2020ORNHMP_06_RAREgAll.pdf, p. 383

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Date	Location of Impact	Summary	Damage
January 1992	Southwestern Oregon	Wind gusts of 110 mph at Brookings	Widespread damage
January 1993	Oregon coast / northern Oregon	Tillamook wind gusts of 98 mph	Widespread damage, especially Nehalem Valley
December 1995	Statewide	Wind gusts of more than 100 mph; Sea Lion Caves, 119 mph	Four deaths, many injuries; widespread damage (FEMA DR-1107-OR)
November 1997	Western Oregon	Winds of 89 mph at Florence, 80 mph at Netarts and Newport	Severe beach erosion, trees toppled
February 2002	Southwestern Oregon	75–100 mph on the southwestern coast (Douglas, Coos, and Curry counties)	Widespread loss of electricity and damage to public utility infrastructure (FEMA DR-1405-OR)
January 2006	Clatsop, Tillamook, Lincoln, and Lane counties	Two storm events with high winds of 86 mph and 103 mph, respectively	Property damage among all four coastal counties; also impacted five other counties outside of Region 1; total damages of \$300,000 and \$200,000, respectively
February 2006	Clatsop, Tillamook, Lincoln, and Lane counties	Windstorm event with winds measured at 77 mph	Property damage among all four coastal counties; the storm also impacted nine other counties outside of Region 1; total damages of \$300,000 and \$275,000

Oregon’s history of wind damage underscores the need for a comprehensive wind hazard mitigation program. The necessity of such an action is supported by the after-action report that followed western Oregon’s high wind event of February 7, 2002 (Hazard Mitigation Survey Team Report, FEMA DR-1405-OR).

Structures that are most vulnerable to high winds in Oregon include insufficiently anchored manufactured homes and older buildings in need of roof repair. Section 307 of the Oregon Building Code identifies high-wind areas along the Oregon coast and sets anchoring standards for manufactured homes located in those areas. It is essential that coastal counties ensure that these standards are enforced. The Oregon Department of Administrative Service's inventory of State-owned and operated buildings includes an assessment of roof conditions, as well as the overall condition of the structure.

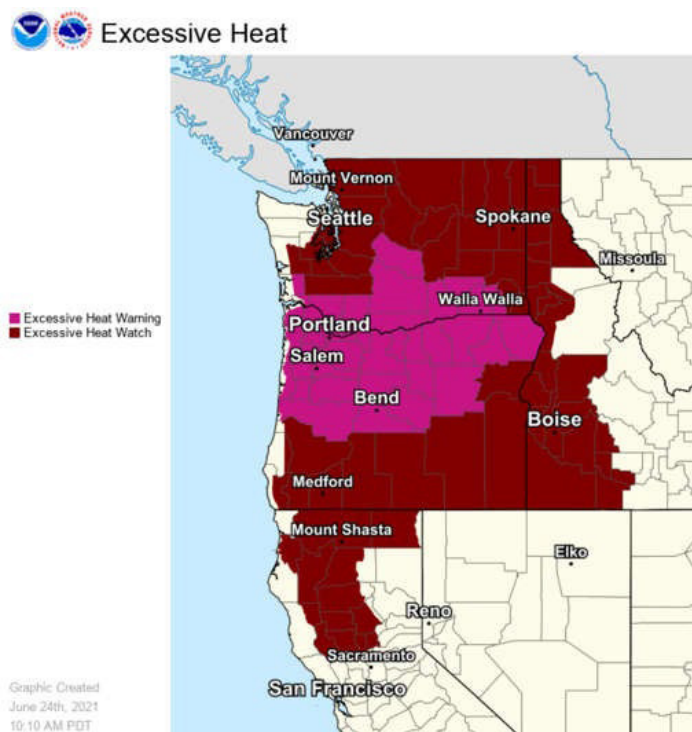
Fallen trees are especially challenging as they can block roads and rails for long periods, which can affect emergency operations. In addition, uprooted or shattered trees can down power and/or utility lines, disrupting local economic and other essential activities. Much of the problem may be attributed to a shallow or weakened root system in saturated ground. Many roofs have been destroyed by uprooted trees growing next to a house. In some situations, strategic pruning may be the answer and some counties will work with utility companies to identify problem areas and establish a tree maintenance and removal program.

3.5.3.9 Extreme Heat

Oregon experienced an unprecedented extreme heat event across the State from June 25 through June 30, 2021. A heat dome lodged over the Pacific Northwest brought three consecutive days of temperatures between 106 and 117 degrees Fahrenheit, resulting in the deaths of 83 people due to hyperthermia (elevated body temperature). Ranging in age from 37 to 97, most of the deceased lived alone in homes with no working air conditioning or fans. This lack of air conditioning left many Oregon residents vulnerable to an extreme heat event. Just 78% of Portland area households have a primary air conditioning unit, 13% less than the national average.⁸⁶

⁸⁶ Oregon Office of Economic Analysis, Fun Friday: Air Conditioning, <https://oregoneconomicanalysis.com/2018/07/20/fun-friday-air-conditioning/>

Figure 16: June 2021 Excessive Heat Map



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Climate scientists predict that excessive heat will become a more common occurrence, making for more frequent, more severe, and longer lasting heat events.⁸⁸ Increased extreme heat in urban areas also poses a risk to human health and safety, especially for those living and working in urban heat islands. People living outdoors, in energy-inefficient manufactured homes, or on the upper floors of multifamily housing units may be particularly vulnerable.⁸⁹ While efforts must continue to slow and stop the factors contributing to climate change, Oregon must also develop immediate and long-term strategies to adapt to today's changing climate. These efforts also must be incorporated into emergency and disaster preparedness and mitigation plans. These events will continue to negatively impact Oregon's environment, economy, health, and livelihood.

⁸⁷ Oregon Office of Emergency Management, Initial After-Action Review of the June 2021 Excessive Heat Event, https://www.oregon.gov/oem/Documents/2021_June_Excessive_Heat_Event_AAR.pdf

⁸⁸ University of Edinburgh, Substantial changes in the probability of future annual temperature extremes (2021), <https://www.research.ed.ac.uk/en/publications/substantial-changes-in-the-probability-of-future-annual-temperatu>

⁸⁹ Oregon Climate Change Research Institute, Fourth Oregon Climate Assessment Report: State of climate science: 2019, https://www.oregon.gov/lcd/NH/Documents/Apx_9.1.21_OR_ClimateAssmtRpt4_2019_OPT.pdf

3.5.3.10 Indispensable Services

Indispensable services are those that enable continuous operation of critical business and government functions and/or are critical to human health and safety and economic security. As part of the NHMP, DOGAMI and DLCD defined and quantified such critical facilities to include buildings that function as airports, communications, emergency operations, fire stations, hospitals or health clinics, military facilities, police stations, schools, detention centers, or miscellaneous facilities (e.g., Oregon Department of Transportation maintenance facility) that would be needed during or immediately after a natural disaster. DOGAMI identified 3,990 such facilities valued at more than \$12 billion.

Tables 68 through 71 indicate the number and value of indispensable service facilities exposed to each of five different hazard types.

Table 68: Wildfire Risk to Indispensable Services

County	High		Low		Moderate	
	Services	Value	Services	Value	Services	Value
Clackamas	5	\$3,673,515	809	\$3,136,262,722	11	\$10,642,500
Douglas	52	\$37,600,023	372	\$871,024,081	61	\$78,241,860
Jackson	112	\$161,277,367	353	\$1,564,121,625	10	\$21,491,206
Lane	7	\$5,655,494	634	\$2,592,676,437	38	\$54,174,853
Lincoln			193	\$213,819,629		
Linn	2	\$419,288	328	\$819,977,080	10	\$5,251,334
Marion	2	\$823,800	988	\$3,308,607,213	2	\$4,207,950
Total	180	\$209,449,487	3,677	\$12,506,488,787	132	\$174,009,703

Table 69: Landslide Risk to Indispensable Services

County	High		Low		Moderate	
	Services	Value	Services	Value	Services	Value
Clackamas	23	\$113,269,172	644	\$2,495,848,266	158	\$541,461,299
Douglas	47	\$55,717,431	319	\$683,924,573	119	\$247,223,960
Jackson	28	\$66,167,333	332	\$1,253,008,456	115	\$427,714,409
Lane	22	\$56,885,941	536	\$2,360,693,588	121	\$234,927,255
Lincoln	53	\$36,616,276	104	\$135,911,599	36	\$41,291,754
Linn	5	\$3,422,550	312	\$782,580,902	23	\$39,644,250
Marion	9	\$5,903,193	897	\$3,048,718,326	86	\$259,017,444
Total	187	\$337,981,896	3,144	\$10,760,685,710	658	\$1,791,280,371

Table 70: Earthquake Risk to Indispensable Services

County	Earthquake – High		Earthquake – Low		Earthquake – Moderate	
	Services	Value	Services	Value	Services	Value
Clackamas	384	\$1,648,297,803	2	\$1,500,000	439	\$1,500,780,934
Douglas	184	\$359,133,307	105	\$303,058,431	196	\$324,674,226
Jackson	277	\$1,230,618,331	14	\$42,668,087	184	\$473,603,780
Lane	142	\$293,816,852	300	\$1,379,236,487	237	\$979,453,445
Lincoln	127	\$156,765,624	15	\$9,274,189	51	\$47,779,816
Linn	267	\$721,958,342	14	\$9,262,710	59	\$94,426,650
Marion	817	\$2,891,502,523	30	\$99,152,014	145	\$322,984,426
Total	2,198	\$7,302,092,782	480	\$1,844,151,918	1,311	\$3,743,703,277

Table 71: Flood Risk to Indispensable Services

County	Hazard Zone		Other	
	Services	Value	Services	Value
Clackamas	12	\$16,061,850	813	\$3,134,516,887
Douglas	47	\$127,700,345	438	\$859,165,619
Jackson	35	\$84,659,780	440	\$1,662,230,418
Lane	95	\$274,560,919	584	\$2,377,945,865
Lincoln	10	\$3,234,560	183	\$210,585,069
Linn	26	\$41,334,300	314	\$784,313,402
Marion	157	\$471,643,195	835	\$2,841,995,768
Total	382	\$1,019,194,949	3,607	\$11,870,753,028

3.5.4 Mitigation Needs Assessment Conclusion

The Mitigation Needs Assessment makes it clear that there are at least nine natural hazards posing a risk to the seven MID counties. By characterizing these hazards in terms of their frequency and the State’s vulnerability, the State and its sub-recipients can draw on this needs assessment and the NHMP to identify current and future hazards in their communities and target CDBG-DR funds toward cost-effective solutions to mitigate them over the long term. In addition, this assessment will inform all CDBG-DR programs and activities undertaken as part of this allocation so that, at a minimum, they do not exacerbate hazards but rather serve to lessen their impacts.



General Requirements

4 General Requirements

4.1 Citizen Participation

4.1.1 Outreach and Engagement

4.1.1.1 Original Action Plan Process

In the development of this Action Plan, OHCS consulted with disaster-affected residents, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure that the consistency of the disaster impacts identified in the plan and the plan and planning process were comprehensive and inclusive.

State Agencies

To begin the development of the Public Action Plan, OHCS consulted with the following State agencies to gain a better understanding of disaster impacts and the current possible shortcomings of State and local funding for wildfire recovery.

- November 18, 2021 – Oregon Office of Emergency Management
- December 1, 2021 – Oregon Department of Land Conservation and Development
- December 9, 2021 – Housing Authority of Jackson County
- December 9, 2021 – Insurance Commissions/Homebuilders Association
- December 15, 2021 – Marion County Housing Authority
- December 16, 2021 – Oregon Department of Consumer and Business Services
- December 16, 2021 – Oregon Department of Energy
- December 17, 2021 – Business Oregon
- January 5, 2022 – Oregon Department of Consumer and Business Services
- January 10, 2022 – Oregon Employment Department
- January 18, 2022 – Oregon Department of Environmental Quality
- January 26, 2022 – Oregon Department of Agriculture
- January 27, 2022 – Oregon Department of Consumer and Business Services
- February 7, 2022 – Oregon Office of Emergency Management
- February 8, 2022 – Oregon Law Center

Through these consultation meetings, OHCS was able to gather data, experiences, and agency expertise to develop an initial unmet needs assessment.

Local Governments and Stakeholders

After developing the initial unmet needs assessment from State agency and federal data, OHCS began an early round of public engagement meetings with local counties, city governments, and long-term recovery groups (LTRGs). OHCS staff were allotted time to present and ask for feedback at each community meeting. The goals of this initial round of engagement were to present OHCS's initial unmet needs assessment and understand the gaps for which local governments, partners, and stakeholders could present more insight.

- March 2, 2022 – City of Talent Council
- March 3, 2022 – Clackamas County LTRG
- March 4, 2022 – Housing Stability Council
- March 4, 2022 – Jackson County LTRG
- March 7, 2022 – City of Phoenix Council
- March 7, 2022 – Holiday Farm Fire Recovery Coordination
- March 8, 2022 – Lincoln County LTRG
- March 10, 2022 – Marion County Board of Commissioners and Various Cities
- March 11, 2022 – Catholic Charities Disaster Case Managers
- March 16, 2022 – McKenzie Disaster Recovery Collective
- March 17, 2022 – Housing Tribal Cluster
- March 17, 2022 – Southern Oregon Regional Solutions Advisory Committee
- March 22, 2022 – Jackson County Commission
- March 23, 2022 – Reimagine and Rebuild Rogue Valley Collective Input Meeting
- March 24, 2022 – McKenzie Rebuilds Housing Subcommittee
- March 25, 2022 – Tribal Economic Development Cluster
- March 28, 2022 – McKenzie Valley LTRG
- March 29, 2022 – Lane County Commission
- March 29, 2022 – Lincoln County Staff and Commissioner Kaety Jacobson
- March 30, 2022 – City of Talent Council Working Session
- March 31, 2022 – Disaster Housing Recovery Task Force
- March 31, 2022 – Latine Jackson County Focus Group (with Unete)
- April 1, 2022 – Klamath/Lake LTRG
- April 4, 2022 – Latine Jackson County Focus Group (with unite Oregon)
- April 4, 2022 – OHCS Manufactured Housing Advisory Committee
- April 5, 2022 – Santiam LTRG

From the initial round of engagement, OHCS was able to receive information from local stakeholders and input on the types of programming for which communities wanted federal funding.

This initial round of public engagement found significant interest in programming for housing and infrastructure issues caused by the wildfire impacts. Many individuals were displaced by the fire and were currently living in RVs/fifth wheels. Community members expressed interest in creating affordable rental housing or possible homeownership opportunities for these individuals. From an infrastructure perspective, many communities strongly indicated that damaged – or previously lacking - infrastructure has limited the ability for both homeowners and businesses to recover. They also noted that very few businesses received federal assistance, leaving them few resources with which to attempt to reopen following both the wildfire and the COVID-19 pandemic. Communities also expressed interest in finding innovative ways to build fire hardening measures and strategies into their community planning and building codes. This would ultimately help communities mitigate against future wildfire risks and vulnerabilities. Feedback from these sessions greatly helped inform OHCS's allocation of funds and program implementation.

Summary of Feedback

Based on these meetings, the State received additional information on unmet recovery and mitigation needs that are not necessarily reflected in the federal datasets.

Housing

- The vast majority of respondents affirmed the priority to focus on providing housing for low- and moderate-income households.
- Severe shortage of rental housing, particularly affordable rental housing. Universally commented on. True in urban areas (cities of Phoenix and Talent), also a common theme in the Santiam Canyon, McKenzie River Valley, and Archie Creek fire-impacted areas. Urban areas are seeing some multifamily projects come in for permits; however, it is unclear where new rental opportunities in more remote rural areas will come from as there are few opportunities for multi-unit rental development due to land use and infrastructure constraints. Santiam Canyon, Jackson County, and Lincoln County all noted severe challenges with regard to workforce housing (at multiple income levels).
- Homeownership opportunities sought. Very common theme, emphasized particularly in the City of Phoenix. The City of Talent and the Unete focus group were very interested in expanding opportunities for community equity models (e.g., coop, community land trust) in park rebuilds.

- Many survivors were living in RVs/fifth wheels. Particularly true in the McKenzie River Valley, Santiam Canyon, Lincoln County, and Klamath (Bootleg Fire). Hundreds of individuals and families lost RVs that were a primary residence. Many were living on the property of extended family or friends; in the Bootleg Fire, many were on public property. In some areas, these are as much as half of the population that remains very difficult to house/serve.
- Large LMI populations but has other needs as well. The Catholic Charities' disaster case managers (DCMs) reported that the hardest to serve populations in Jackson County were LMI populations formerly occupying manufactured homes. Glide Revitalization (Archie Creek fire/Douglas County) reported that roughly three-quarters of families struggling to rebuild were LMI. Unete and Jackson County LTRG surveys documented large LMI populations. However, moderate income populations (above the LMI level) also are struggling with building costs, materials costs, and being underinsured. This is notable in the McKenzie River LTRG needs assessment, Lincoln County LTRG, Joint Committee on Wildfire Recovery testimony, and the Unete focus group.
- Housing must be built to accommodate/provide access for those with disabilities. This issue was noted among discussants at the AARP study presentation and Unete focus group. Those with disabilities are struggling with recovery and we all either have a disability currently or are at risk of developing one in the future.
- Housing permitting infrastructure. Lane County, in particular, noted that providing permit review and inspection services will be a challenge.

Mitigation

- There was strong, near universal, support for the importance of integrating resilience in new housing construction. Several discussions noted that this will be very difficult with regard to manufactured homes.
- Local governments, in particular, are seeking mitigation infrastructure investments. Marion County is seeking \$2 million in funding to replace major components of the public safety radio system. There are similar needs in Douglas and Lane counties. (Jackson County requested consideration regarding the use of CDBG to support debt service toward recent emergency communications investments.)
- Human/Organizational preparedness. Participants in the Unete focus group commented on the need for more education on/understanding of how to deal with disaster among community-based organizations, churches, and local governments.
- Dual-purpose investments were proposed (e.g., there was a need in the Santiam/Detroit area for a warming shelter that could also double as an evacuation point or immediate disaster shelter).

Infrastructure

- **Governments** and LTRGs in both canyons (Santiam Canyon and McKenzie River Valley) noted that additional investments in infrastructure (particularly sewer/community septic) are essential for businesses and homeowners to recover. Landlords/Sellers are not willing to rebuild because the infrastructure is insufficient. The Glide Water District has a capacity issue that is a constraint on recovery as well. (Much of the lost housing was marginally served or in gray areas in terms of permitting. Feasible routes for returning housing in some numbers, particularly for renters, are dependent upon new infrastructure investments.) There is a need for immediate planning, engineering work, and longer term capital investments.
- Transportation investments. Improvements to damaged roads and a need for a new, more urban infrastructure are issues in Marion and Lincoln counties, in particular. The City of Phoenix and Unete focus group both noted a need for new pedestrian safety improvements as denser development is occurring in the semi-urbanized areas of Jackson County.
- The City of Phoenix plans to urbanize the unincorporated area that burned and will require additional infrastructure investment.

Economic Revitalization

- Many businesses are stuck in recovery with insufficient insurance to complete rebuilds. This issue was raised by the City of Talent Council, the Southern Oregon Regional Solutions Advisory Committee, and elsewhere. Several communities, both in Jackson County and in Santiam Canyon (particularly Detroit and Gates), lost large proportions of their commercial areas. Lack of reinvestment poses a long-term challenge to the financial viability of local government and is a deterrent to potentially returning residents.
- Many businesses received no assistance. Early-stage businesses did not have the financial records/history to qualify for SBA loans.
- New businesses seeking to establish business and/or join in the recovery process lack resources. Several early-stage businesses in Glide are actively seeking financing.
- Mixed-income or mixed-use (housing over commercial) investments could be a means to help jump-start commercial zone redevelopment (e.g., City of Detroit, Jackson County urban areas).
- The workforce housing barriers noted above are an economic revitalization challenge.

Administration/Support Services

- Mixed comments from local governments on centralization/decentralization. Several governments (e.g., Lane County Board of Commissioners) expressed interest in more decision making and control being devolved to local government. Several, including Jackson County and the City of Phoenix, noted that the local capacity to manage/deliver programs under HUD rules could be a challenge.
- Social support programs for survivors. An interest in additional/continued services for survivors was noted in multiple contexts, particularly a need for help with mental/behavioral health, legal aid support, and assistance in accessing CDBG-DR programs. Multiple parties emphasized a need to maintain continuity of services for the most-challenged survivors by finding ways to allow them to continue working with existing DCMs and LTRGs that have established relationships and trust. Lane County noted a need for more tribal member outreach.

Eligibility

- Bootleg fire. The number of survivors severely impacted by the Bootleg fire (in 2021) is likely larger than the Clackamas, Douglas (Archie Creek), or South Obenchain fires of 2020. It is unfair that they have had so many fewer resources.
- Marginalization/Documentation issues. Members of the Unete focus group noted that many from the farmworker and immigrant community do not live in the “black and white” boxes of the majority population. Both the rules and the attitude of those administering the rules and interacting with survivors need to take account of this reality.

Survey

OHCS recognizes that affected stakeholders are at the center of and are partners in the development and implementation of this plan. Opportunities for resident input were provided throughout the planning process through a public input survey that was posted on the [OHCS website](#). This survey also was distributed at OHCS presentations and provided to DCMs/community leaders to distribute to impacted residents.

An email inbox for the program also was created for residents to directly voice concerns and/or provide additional feedback to the OHCS team.

4.1.1.2 Action Plan Amendment # 2 — Substantial

Throughout the past year, OHCS launched its pillar programs, HARP and PIER. Additionally, in anticipation of launching more programs, the state has focused engagement efforts

with survivors, subrecipients, community-based organizations, and local governments. To support housing efforts specifically, the state held:

- Weekly subrecipient meetings and updates over the past 12 months, supporting HARP launch.
- Three in-person public presentations in Lane County with subrecipients, survivors, and community partners.
- Three in-person public presentations in Jackson County with subrecipients, survivors, and community partners.
- Three virtual public presentations with subrecipients, survivors, and community partners.
- Four intake center visits, to connect with intake specialists and partners.
- Regular outreach and engagement with Community Action Agencies currently serving fire-impacted renter households to provide feedback on IHA program design.
- Three meetings in early 2024 with county officials to discuss HOP allocation strategies and a request for the program to be expanded to include affordable housing development.
- Additional outreach to disaster-impacted renter households through an online renters survey and to local officials and advocates through HOP committee meetings.
- Meetings with local governments and their partners to re-establish needs, center the proposed programmatic solutions, and outline the Action Plan Amendment. As a result, the amendments proposed are an outcome of the following meetings:
 - July 26, 2024 – Jackson County, local government, and community partners
 - July 29, 2024 – Lane County, local government, and community partners
 - July 30, 2024 – Marion County and local government
 - July 31, 2024 – Lincoln County and local government
 - Aug. 01, 2024 – Clackamas County and local government
 - Aug. 06, 2024 – Linn County and the county commissioner
 - Aug. 19, 2024 – Douglas County, local government, and community partners

The summary of these engagements and their impact on the proposed housing program amendments are described in Section 6.1.2 Action Plan Amendment #2 — Unmet Needs Updated.

Additional Action Plan Engagement Efforts

Several touchpoints with subrecipients, other state agencies, community partners, local governments, elected officials, and other stakeholders were held on the following dates to promote the upcoming substantial amendment, public hearings, and public comment period:

- Wednesday, Oct. 02, 2024
- Wednesday, Oct. 16, 2024
- Thursday, Oct. 17, 2024
- Thursday, Oct. 31, 2024

Lastly, as the Resilience Planning Program prepared for implementation, OHCS worked closely with the governor's office to determine the parameters of the statewide resilience plan. As a result, the amendments proposed are an outcome of the following meetings held during the public comment period:

- Wednesday, Oct. 23, 2024
- Tuesday, Oct. 29, 2024
- Wednesday, Nov. 6, 2024
- Thursday, Nov. 14, 2024
- Wednesday, Nov. 20, 2024

Upon publication, public comments were collected from the public, partners, and other stakeholders and are summarized in the Appendix.

4.1.2 The Public Action Plan's Public Comments

In addition to the activities above, OHCS has published this Action Plan (and subsequent amendments) at oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Public-Involvement.aspx for a 30-day public comment period. Residents were notified through the following methods:

- Direct email notice to individuals who had signed up for updates on CDBG-DR plan development.
- Email notices to local and tribal governments and nonprofit/community-based organizations that have been active in supporting survivors in disaster recovery, e.g., Long Term Recovery Groups, AARP, disability service advocates, and culturally-specific organizations.

- Public comment period information and communications materials provided to HARP outreach and engagement partners. This includes outreach materials designed for communication with their respective communities, as outlined in the HARP Partner Toolkit developed by OHCS
- Press release to all major news outlets state-wide.
- Announcements on agency-managed social media accounts.
- Formal notice on OHCS's website at oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Public-Involvement.aspx.

OHCS will ensure that all residents have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP).

A summary of residents' comments on this Action Plan, along with OHCS responses, is in an Appendix of this document. For more information, residents can refer to the OHCS Citizen Participation Plan, which can be found at oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Public-Involvement.aspx.

4.1.3 Public Hearings

As part of its initial Public Action Plan development process and subsequent substantial amendments, OHCS is required to hold at least one public hearing in one of the HUD-identified MID areas in order to obtain residents' views and to respond to proposals and questions. All public hearings were held at facilities that are accessible to individuals living with disabilities.

OHCS hosted and presented at public hearings in the following locations, the week of May 16 and May 24, 2022:

- Lincoln County
- Marion/Linn County
- Lane County
- Jackson County (English)
- Jackson County (Spanish) – May 24
- Virtual Open House

OHCS hosted and presented at public hearings in the following locations, Oct. 22 through Oct. 30, 2024:

- Lincoln County

- Marion/Linn counties
- Lane County
- Jackson County (English)
- Jackson County (Spanish) — Oct. 23
- Virtual hearing

The in-person public hearings were supplemented with key information and recorded presentations on the project website along with multiple methods for making virtual public comments.

Members of the public were able to submit public comments in a variety of ways, to reduce barriers of equitable participation in the public comment period:

- Online webform on the OHCS website
- Email
- Leaving a voicemail through a toll-free number
- Mailing in comments or letters to OHCS mailbox
- Public hearings

4.1.4 Complaints and Appeals

4.1.4.1 Complaints

OHCS or its subrecipients shall provide a written response to each formal complaint within 15 working days of receipt of the complaint or will document why additional time for a response is needed.

- Formal complaints are written statements of grievance, including email, comments posted on the OHCS website, and handwritten complaints. OHCS shall detail the process and contact information (through the website and email address) for submitting complaints within program guidelines, application documents, and on the OHCS website. OHCS shall maintain a tracker for collecting and categorizing complaints through resolution.
- Informal complaints are verbal complaints. OHCS and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process described above.
- Complaints alleging the violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of government

funds should be forwarded to the HUD Office of the Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). OHCS will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on oregon.gov/ohcs/disaster-recovery/pages/reoregon-fwaa.aspx to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

4.1.4.2 Appeals

OHCS or its subrecipients shall include written appeals processes within each set of program guidelines. The appeals processes will include, but are not limited to the following:

- The process for submitting, tracking, and resolving a written appeal to the organization administering the program (OHCS or its subrecipient), to include whether an appeals committee will be established to review and/or rule on appeals.
- The documentation required when submitting an appeal.
- The timelines for reviewing and providing a response to the appeal.
- Clarification of what may or may not be appealed. Generally, policies that have been approved and adopted within program guidelines may not be appealed. OHCS and its subrecipients do not have the authority to grant an appeal to a regulatory or statutory or HUD-specified CDBG-DR requirement.

4.2 Public Website

OHCS will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, activity and program information described in this plan, and the details of all contracts and ongoing procurement processes.

These items are made available at oregon.gov/ohcs/disaster-recovery/Pages/ReOregon.aspx.

Specifically, OHCS will make the following items available: the action plan created using the Disaster Recovery Grant Reporting System (DRGR), including all amendments; each Quarterly Progress Report (as created using the DRGR); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary, including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals).

Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted on a grantee's website.

In addition, OHCS will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds.

OHCS shall make these documents available in a form accessible to persons with disabilities and those with limited English proficiency, or LEP. OHCS shall take reasonable steps to ensure meaningful access to their programs and activities by LEP persons, including individuals from underserved communities, and in a form accessible to persons with disabilities. The website will provide multiple methods of communication to ensure there are not barriers to equitable participation for persons with disabilities.

The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

4.3 Amendments

Over time, recovery needs will change. Thus, OHCS will amend the Disaster Housing Recovery Action Plan as often as necessary to best address the long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop over time, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

When unmet needs and program descriptions or other sections rise to the level of requiring an action plan amendment, the State will do the following:

- Ensure that the current version of the Action Plan is accessible for viewing as a single document, with all amendments, so that the public and HUD do not have to view and cross-reference changes among multiple amendments.
- Identify amendments by highlighting added or changed text and striking out deleted text.
- Include a table that clearly illustrates where the funds are coming from and where they are going.
- Include a revised budget allocation table that reflects the entirety of all funds, if applicable to the amendment.

4.3.1 Substantial Amendment

A change to the initial Action Plan is substantial if it meets the following criteria:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- The allocation or reallocation of the greater of either a re-allocation of \$5 million or a reallocation that constitutes a change of 15% or greater of a program budget

When OHCS pursues the substantial amendment process, the amendment will be posted on the State's CDBG-DR website for a 30-day public comment period, located at [OHCS's website, oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Public-Involvement.aspx](https://oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Public-Involvement.aspx). The amendment will be posted in adherence with the Americans with Disabilities Act and LEP requirements. OHCS will review and respond to all public comments received and submit the comments and responses to HUD for approval.

A substantial action plan amendment shall require the following:

- The State will revisit the impact and needs assessment when moving funds from one program to another through a substantial amendment.
- A 30-day public comment period will include the following:
 - The State will prominently post the action plan amendment on the OHCS official disaster recovery website at oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Action-Plan.aspx.
 - The State will afford residents, affected local governments, and other interested parties a reasonable opportunity to review the plan or substantial amendment.
 - The State will identify and consider potential barriers that limit or prohibit equitable participation and will undertake reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with limited English proficiency. This includes the following:
 - The action plan amendment will be translated according to the CDBG-DR Language Access Plan.
 - The action plan amendment will be posted in a way that meets all accessibility requirements.

- The State will review and respond to all written and oral public comments received. Any updates or changes made to the Action Plan in response to public comments shall be clearly identified in the Action Plan and amendments. The public comments also will be submitted to HUD with the final Action Plan amendment.
- Receipt of approval from HUD.

4.3.2 Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. OHCS will notify HUD 5 business days before the change is effective.

All amendments will be numbered sequentially and posted to the website in one final, consolidated plan.

4.4 Displacement of Persons and Other Entities

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, OHCS will coordinate across federal, State, and local organizations to meet its commitment to minimize the displacement of homeowners and tenants due to the delivery of CDBG-DR programs. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure that the requirements of the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, are met.

OHCS will draw on existing Residential Antidisplacement and Relocation Assistance Plans (RARAPs) and will adapt them to meet the URA, Section 104(d), and related waivers and the alternative requirements specified in the Consolidated Notice. The adapted RARAP also will be updated prior to implementing any activity with CDBG-DR grant funds.

Since the 2020 Wildfires and prior to the availability of CDBG-DR funding, OHCS has been working to minimize the displacement and loss of housing assistance for impacted owner and renter residents by coordinating the provision of support and resources to impacted survivors through multiple entities, including the following:

- FEMA
- FEMA disaster case managers
- Oregon Department of Human Services

- Oregon Health Authority
- Oregon Office of Emergency Management
- Local governments
- Long-term recovery groups
- Community action agencies
- Public housing authorities
- State and local elected officials
- Other community-based organizations

OHCS will ensure that all CDBG-DR programs directly administered by OHCS and those programs administered through partner State agencies and subrecipients comply with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended (49 CFR Part 24), and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and the implementing regulations at 24 CFR Part 570.496(a) to minimize displacement. These regulations and requirements apply to both property owners and tenants in the event that proposed projects cause the displacement of persons or other entities. OHCS will include detailed policies and procedures for when proposed programs or projects could potentially cause the displacement of people or other entities.

CDBG-DR funds may not be used to support any federal, State, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. Public use shall not be construed to include economic development that primarily benefits private entities. None of the currently planned projects under this Action Plan contemplate the use of eminent domain.

4.5 Protection of People and Property

The State of Oregon will leverage the CDBG-DR funds to build economic and disaster resilience into all recovery programs and activities. Some of the ways that the State will do this are included in the sections below.

4.5.1 Elevation Standards

To protect against current and future flood risks, the federal government mandates elevation standards when federal funds are used for new construction, reconstruction, repair of substantially damaged structures, or substantial improvement to structures that are principally for residential use and located within a high-risk floodplain as defined by the recently mandated FFRMS. The FFRMS creates a shift in the federally recognized floodplain

as it expands from the 100-year floodplain to the new “FFRMS floodplain.” The new FFRMS revises floodplain management regulations in 24 CFR Part 55 and offers changes to minimum property standards in 24 CFR Part 200. The effective date of the new FFRMS was May 23, 2024, with a compliance date of June 24, 2024.

The FFRMS floodplain and required elevations can be determined using one of the three different approaches described below:

1. **Climate-Informed Science Approach (CISA):** The elevation and corresponding horizontal floodplain that result from using the best-available, actionable hydrologic and hydraulic data and methods that integrate current and future changes in flooding based on climate science
2. **2,500-year Floodplain or 0.2-Percent-Annual-Chance Flood Approach (0.2 PFA):** The area subject to flooding by the 0.2% AC flood
3. **Freeboard Value Approach (FVA):** The elevation and corresponding horizontal floodplain that result from using the freeboard value, reached by adding 2 feet to the base flood elevation (BFE) for noncritical actions (+2' FVA) and from adding 3 feet to the BFE for critical actions (+3' FVA)

New construction or substantial improvement to structures determined to be within the FFRMS floodplain must be carried out in accordance with the FFRMS's Eight-Step Process. Some updates of importance include the update to HUD's Minimum Property Standards under 24 CFR Part 200.

The definition of **substantial damage** is defined in 44 CFR Part 59.1 and applies to any reconstruction, rehabilitation, addition, or other improvement to a structure, the total cost of which equals or exceeds 50% of the market value of the structure before the damage occurred.

The definition of **substantial improvement** is defined in 24 CFR Part 55.2(b)(12) as any repair, reconstruction, modernization, or improvement of a structure, including a manufactured housing unit, the cost of which equals or exceeds 50% of the market value of the structure, or that results in an increase of more than 20% in the number of dwelling units in a residential project.

4.5.1.1 Residential

All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 1% annual chance (or 100-year) floodplain, which receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with

the lowest floor, including the basement, at least 2 feet above the 1% annual chance floodplain elevation (base flood elevation). Mixed-use structures with no dwelling units and no residents below 2 feet above base flood elevation must be elevated or floodproofed up to at least 2 feet above base flood elevation.

Based on FEMA IA data, it is estimated that fewer than 10 properties that were destroyed by the wildfires were located in the Special Flood Hazard Area (SFHA), or 100-year floodplain. However, it is known that portions of some manufactured housing parks are located in the SFHA, and it is likely that there are more than 10 impacted properties in the SFHA. OHCS will discourage the placement or reconstruction of housing in the SFHA, wherever practicable; however, there will be homes that will be rebuilt or replaced in the SFHA. OHCS will ensure that all rehabilitation of substantial damage will meet the HUD-required elevation standards through the construction requirements of all CDBG-DR residential programs.

The cost of elevation will be included as part of the overall cost of rehabilitation or replacement of a property. It is estimated that the costs will depend on the location, the size of the unit, and the level to which the property must be elevated. For single-family residences and manufactured homes, if a home is within a 100-year floodplain, OHCS will ensure the cost reasonableness of elevation costs by analyzing multiple bids from contractors, cost estimating software, and/or examples of comparable costs to elevate in similar markets.

OHCS and the Oregon Department of Land Conservation and Development (DLCD) have already provided the 2-foot elevation requirements to local building and permit officials, and they are working with residents in the floodplain to inform them that this is a requirement in order to qualify for CDBG-DR assistance.

4.5.1.2 Infrastructure

All critical actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2% annual chance) floodplain must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)–(3) or a successor standard) to the higher of the 500-year floodplain elevation or 3 feet above the BFE. If the 500-year floodplain is unavailable and the critical action is in the 100-year floodplain, then the structure must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)–(3) or a successor standard) at least 3 feet above the BFE.

“Critical actions” are defined as “any activity for which even a slight chance of flooding would be too great because such flooding might result in loss of life, injury to persons or

damage to property.” For example, Critical Actions include hospitals, nursing homes, emergency shelters, police stations, fire stations, and principal utility lines.

Exceptions to this requirement may be allowable when the following conditions apply:

- CDBG-DR funds are used as the non-federal match for FEMA assistance.
- The FEMA-assisted activity, for which CDBG-DR funds will be used as match, commenced before HUD’s obligation of CDBG-DR funds to the grantee.
- OHCS has determined and demonstrated with records in the activity file that the implementation costs of the required CDBG-DR elevation or floodproofing requirements are not “reasonable costs” as that term is defined in the applicable cost principles at 2 CFR 200.404.

4.5.2 Flood Insurance Requirements

The 2020 Wildfires in Oregon were not a flooding event; however, the State is committed to ensuring that homeowners are protected from future flooding disasters. The State—including through the DLCD and Oregon Office of Emergency Management—is working closely with local floodplain managers to encourage residents, businesses, and local governments to maintain flood insurance, including for properties located outside the SFHA. The State also is working closely with FEMA and local floodplain managers to understand the implications of Risk Rating 2.0 and the additional costs of flood insurance policies to help inform more resilient building codes and practices.

Property owners who are receiving assistance must comply with all flood insurance requirements.

Because the 2020 Wildfires were not a flooding event, the following conditions

DO NOT apply:

HUD-assisted homeowners for a property located in an SFHA must obtain and maintain flood insurance in the amount and duration prescribed by FEMA’s National Flood Insurance Program. The grantee may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has received federal flood disaster assistance that was conditioned upon obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. The grantee is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120% of the area median income (AMI) or the national median,

- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure that adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance, homeowners may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120% of the AMI or the national median and has unmet recovery needs.

4.5.3 Construction Standards

OHCS will require quality inspections and code compliance inspections on all projects and places, with an emphasis on high-quality, durable, sustainable, and energy-efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

Oregon's impacted communities indicated early in the aftermath of the disaster that they were struggling to meet the demands of inspections, permitting, and supporting residents through their recovery. To help increase the capacity of local governments, the State legislature appropriated more than \$4 million in financial assistance for local building and planning department staff to help expedite the inspection and permitting processes.

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- ENERGY STAR® (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance, or Neighborhood Development)
- ICC 700 National Green Building Standard®
- U.S. Environmental Protection Agency (EPA) Indoor airPLUS
- Equivalent or higher Oregon energy efficiency standards
- Any other equivalent comprehensive green building standard program acceptable to HUD

OHCS will specify the standards that will be used within each set of program guidelines.

For the rehabilitation of non-substantially damaged residential buildings, OHCS will follow the guidelines to the extent applicable as specified in the [HUD Office of Community Planning and Development \(CPD\) Green Building Retrofit Checklist](#).

When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program-designed products and appliances.

For infrastructure projects, OHCS will encourage, to the extent practicable, the use of green infrastructure design and implementation, such as those issued by:

- U.S. EPA through their [Green Infrastructure Design and Implementation guidance](#).
- HUD through their [Green Infrastructure and Sustainable Communities Initiative](#).
- Standards that are incentivized through the Oregon Department of Environmental Quality, including for clean water initiatives.

The term “substantial damage” applies to a structure in an SFHA—or floodplain—for which the total cost of repairs is 50% or more of the structure's market value before the disaster occurred, regardless of the cause of the damage.

Per Oregon Revised Statute 456.510, OHCS-funded rental housing programs must follow visitability requirements. With certain exceptions, OHCS-subsidized rental housing for a new single-family or duplex dwelling with habitable space on the first floor must be designed and constructed as a “visitable” dwelling (see <https://www.oregonlaws.org/ors/456.510>). The State will adopt this standard in the reconstruction or new construction of all site-built housing funded with CDBG-DR assistance. This is in addition to ensuring that all multifamily housing subsidized with CDBG-DR assistance meet Americans with Disabilities Act and accessibility requirements. By adopting this standard across its programs, the State will help increase the availability of accessible housing to meet the current and future needs of older adults and people living with disabilities. This will increase opportunities for households to age in place and build in increased community resiliency for individuals with disabilities.

All projects will be subject to cost reasonableness standards as outlined in the policies and procedures of the applicable program specific to the applicable activity.

4.5.4 Contractors' Standards

4.5.4.1 Section 3

Contractors selected under OHCS will make every effort to provide opportunities to low- and very low-income persons by providing resources and information to notify Section 3 individuals and businesses about opportunities in the community.

OHCS will undertake the following efforts to help meet its Section 3 goals:

- Ensure that Section 3 requirements are outlined in all applicable contracts and subrecipient agreements.
- Build the capacity of stakeholders, including subrecipients and contractors, to meet Section 3 standards through technical assistance, tools, and guidance.
- Designate a Section 3 coordinator who will manage, support, and facilitate an effective Section 3 program, and who will be able to effectively communicate program requirements to stakeholders.

OHCS will report on Section 3 accomplishments in the DRGR.

4.5.4.2 Minority- and Women-Owned Business Enterprises, Emerging Small

Businesses, and Service-Disabled Veteran Business Enterprises

It has been known that the housing and construction industry employs, from design to lease up and management, a wide spectrum of size of trade and business sectors. However, the participation of Certified Minority Business Enterprises (MBE), Women-owned Business Enterprises (WBE), and Emerging Small Businesses (ESB) - collectively known as Minority, Women and or Emerging Small Businesses (MWESB/SDVBE) - as well as Service-Disabled Veteran Business Enterprises (SDVBE); is small and their share of the financial investments in housing is small in comparison to the size of the investment.

Underlying this under representation are the limited and often cumbersome requirements by other systems to prepare, encourage and facilitate that more minority women and veteran owned enterprises get a share of the financial activities of the construction industry. Furthermore, while some of these systems of economic incentives are in place, they do not reach or are unable to break the veil of distrust that women, business owners from communities of color or veterans have in public systems that hinder their participation in construction and in the affordable housing industry.

Diversity, Equity, and Inclusion (DEI) and Certification Office for Business Inclusion and Diversity (COBID) are mechanisms and opportunities to help increase the economic participation of minority, women and veteran-owned enterprises in the development and construction of affordable housing. It is the goal of OHCS that minority, women-owned and service-disabled veteran business enterprises have equal access to business opportunities resulting from OHCS-financed contracts. The desired outcome is to see a greater economic participation and share of financial resources for COBID certified firms.

OHCS has published a detailed manual on how the State will carry out these mechanisms in their MWESB/SDVBE Compliance Manual for affordable rental development programs. The State will adapt this manual for CDBG-DR funded activities carried out through vendors and developers.⁹⁰

4.5.4.3 Culturally Specific Organizations

OHCS will further economic opportunities for protected classes and lower income households by engaging Culturally Specific Organizations, either directly through subrecipient agreements or through procured vendors. **“Culturally Specific Organization”** means an entity that provides services to a cultural community and the entity has the following characteristics:

- Majority of members and/or clients are from a particular community of color
- Organizational environment is culturally focused and the community being served recognizes it as a culturally-specific entity that provides culturally and linguistically responsive services
- Majority of staff are from the community being served, and the majority of the leadership (defined to collectively include board members and management positions) are from the community being served
- The entity has a track record of successful community engagement and involvement with the community being served
- The community being served recognizes the entity as advancing the best interests of the community and engaging in policy advocacy on behalf of the community being served

⁹⁰ MWESB/SDVBE Compliance Manual, October 2021, <https://www.oregon.gov/ohcs/development/Documents/admin/MWESB/OHCS-MWESB-Compliance-Manual.pdf>

4.5.4.4 Contractor Standards

Recovery programs implemented by OHCS and its subrecipients will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. Construction contractors will be required to carry the required licenses and insurance coverage(s) for all work performed, and State-contracted contractors will be required to provide a warranty period for all work performed.

Contractor standards and warranty periods will be detailed in the respective policies and procedures documents and will pertain to the scale and type of work being performed, including the controls for ensuring that construction costs are reasonable and consistent with market costs at the time and place of construction. Rehabilitation contract work provided through a program administered by OHCS included in this Action Plan may be appealed by homeowners and small businesses (if applicable) whose property was repaired by contractors under the State's control.

As included in the State's certifications, OHCS is committed to meeting full and open competition requirements, which will help ensure that construction costs are reasonable and consistent with market costs at the time and place of construction.

The processes for homeowners to submit appeals and complaints for rehabilitation work completed through State-administered programs will be detailed within each respective set of program guidelines.

4.5.5 Preparedness, Mitigation, and Resilience

"Resilience" is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

4.5.5.1 Protect People and Property from Hardship

Each OHCS CDBG-DR program and activity—whether through construction activities, public services, and/or planning activities—includes measures that will increase resilience to disasters and reduce or eliminate the long-term risk of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters. Hardships include, but are not limited to, financial hardship and hardship caused by future disasters and climate change. The State will document how programs and activities protect people and property from hardship within program and/or applicant files.

4.5.5.2 Emphasize High Quality, Durability, Energy Efficiency, Sustainability, and Mold Resistance

To ensure energy efficiency in all new construction, reconstruction, and replacement activities, OHCS will adopt one of the standards allowed by HUD and/or more strict standards required by the State of Oregon. These standards will be detailed in program guidelines. For example, OHCS may adapt the practices and requirements carried out through the Oregon Department of Energy's [Energy Efficient Wildfire Rebuilding Incentive Program](#). This program incentivizes energy efficiency in the reconstruction or replacement of damaged housing at or above the applicable building codes. Incorporating these energy efficiency improvements help make structures more comfortable and support long-term affordability through lower energy bills.

To the extent practicable and at a reasonable cost, the State will build the home to an above-code standard, such as the [Oregon Residential Reach Code](#), which provides an additional choice for builders, consumers, and contractors to increase energy efficiency for the construction of structures regulated by the Oregon Residential Specialty Code.

For repairs, the State will use the HUD CPD Green Building Retrofit Checklist and will attempt to add additional energy efficiency components when practicable and/or of reasonable cost. In all construction activities administered by the State, the State will use mold-resistant products when replacing surfaces such as drywall.

4.5.5.3 Support the Adoption and Enforcement of Modern and Resilient

Building Codes and the Mitigation of Natural Hazard Risks

The [Oregon Building Codes Division](#) adopts, amends, and interprets the specialty codes that make up the Oregon State Building Code. The division administers each code through specialized code programs. Agency staff members work with local building officials, industry professionals, advisory boards, and the public to adopt new codes and standards, approve new methods and materials, and maintain a uniform building code throughout the State.

Oregon building codes include extensive energy efficiency requirements. The division also publishes guidance on requirements and how to design and build for seismic, ground snow load, and special wind risks.

Local building codes and planning departments also incorporate specific disaster mitigation features that reflect the risks in their communities. Some of these features are outlined below:

- Three out of the seven HUD-identified MIDs are participating in the National Flood Insurance Program Community Rating System. Marion County requires the construction of properties to be at least 2 feet above base flood elevation.
- Jackson County requires a fire safety inspection, which includes fire resiliency requirements.
- Klamath and Linn counties include recommendations for fire mitigation within their local planning and permitting departments.

Each city and every county have a comprehensive plan that includes a zoning layer. Some of them limit the density and quantity of development. Generally, these requirements are in line with the State's planning and [Urban Growth Boundaries](#). Through these zoning layers, many local governments define what are considered to be buildable lands. The key components that influence the development on buildable lands are described below:

- Urban Growth Boundaries allow cities to plan for growth and prevent urban sprawl, safeguarding farm and forest lands.
- Affordable housing initiatives allow more people to call Oregon their home.
- Economic development analyses help local land use planners set up their towns and cities for long-term success.
- Transportation planning allows towns to grow into newly built roads and pathways without feeling constricted.
- Public facility plans ensure that people will have the utilities they need for modern life.
- Recreation planning allows residents and visitors to enjoy Oregon's beauty.

The Building Codes Division also has launched a [Fire Hardening Grant Program](#) for homes and businesses that were lost or damaged in the 2020 Wildfires. The program will provide money directly to home and business owners who complete qualifying fire hardening improvements on their home or business that was damaged or destroyed. The Fire Hardening Options Guide provides a menu of incentivized fire hardening options to encourage residents and business owners to rebuild more resiliently. To the extent practicable, OHCS will incorporate these fire hardening measures in all reconstruction or substantial rehabilitation programs.

OHCS will draw from best practices across Oregon and the country, as applicable, to incorporate these standards into the State's program designs. In addition, OHCS may help local governments consider adopting and enforcing modern and resilient building codes that account for known risks and projected risks arising from climate change.

4.5.5.4 Establish and Support Recovery Efforts by Funding Feasible, Cost-Effective Measures That Will Make Communities More Resilient Against a Future Disaster

OHCS will document in program guidelines and project files how approved programs or projects will make communities more resilient against a future disaster. Within the file, OHCS will include a cost reasonableness and/or cost-benefit analysis of the activity, which will include the quantifiable benefits or description of the mitigation benefits of the project or program. This may include, but is not limited to, an analysis of:

- The risks to public health, safety, and well-being without the project or program.
- The costs against the anticipated value of the risk reduction in both direct damages and subsequent negative impacts to the area if future disasters were to occur.
- The contribution of the activity to a long-term solution to the problem it is intending to address.
- How the activity will protect the functionality of the project for its useful life and/or create manageable future maintenance and modification options.

4.5.5.5 Make Land Use Decisions That Reflect Responsible and Safe Standards to Reduce Future Natural Hazard Risks

Allowable uses of lands in Oregon are heavily regulated and enforced through State and local building codes, zoning, and adopted plans. Many of these efforts include extensive measures to reduce future natural hazard risks, and OHCS will ensure that CDBG-DR activities comply with existing and future applicable State and local requirements.

Through the planning activities funded through this Action Plan, local and tribal governments may use funds to carry out the planning needed to enhance local codes and standards, carry out additional outreach to members of their communities, and/or develop policy modifications that will help encourage responsible and safe standards to reduce future natural hazard risks.

4.5.5.6 Increase Awareness of the Hazards in Communities, Including Underserved Communities, Through Outreach in the MID Areas

To effectively increase the awareness of community hazards, the State knows that information needs to be shared with residents and businesses through local, trusted resources. As part of the delivery of CDBG-DR programs, the State will allocate or award significant funding to local governments and community-based nonprofit organizations through its housing, public services, planning, and infrastructure programs.

The State will partner with these organizations to help carry out the recovery and mitigation programs. Through those partnerships, the State also will seize the opportunity to help local entities share information, perform community outreach and engagement, and solicit feedback from those with lived experiences to help increase awareness of macro- and micro-level risks to impacted communities.

4.5.5.7 Promote Sound, Sustainable Long-Term Recovery Planning Informed by a Post-Disaster Evaluation of Natural Hazard Risks

The State has allocated some funding toward planning activities. One of the primary purposes of the program is to promote sound, sustainable long-term recovery that accounts for an understanding of current and projected natural hazard risks, including climate-related hazards.

4.5.5.8 Use of the FEMA-Approved Hazard Mitigation Plan

The Oregon DLCDC is the lead agency for developing the State's FEMA-approved Hazard Mitigation Plan. However, the planning process is informed by multiple federal, State, local, and tribal government agencies, through the development of local hazard mitigation plans, and the [State Interagency Hazard Mitigation Team](#).

For its programs, OHCS will coordinate and consult with DLCDC and other members of the State Interagency Hazard Mitigation Team, as well as local planning and mitigation staff, to incorporate strategies that lessen the loss of life, property, economic, and natural resources that face the risks identified through State and local planning efforts.

Through its application and cost evaluation processes described in program guidelines, OHCS will ensure that all mitigation efforts have a reasonable cost relative to other alternatives. The documentation will include the cost of the mitigation strategy and a description and documentation of cost reasonableness.

4.5.6 Broadband Infrastructure in Housing

Any substantial rehabilitation, as defined by 24 CFR 5.100, reconstruction, or new construction of a building with more than four rental units funded with CDBG-DR assistance must include the installation of broadband infrastructure, except when OHCS determines and documents that:

- The location of the new construction or substantial rehabilitation makes the installation of broadband infrastructure infeasible,

- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity, or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes the installation of broadband infrastructure infeasible.

4.5.7 Cost-Effectiveness

The State will establish policies and procedures to assess the cost-effectiveness of each proposed program or activity to assist a household under any residential rehabilitation or reconstruction program or activity funded with CDBG-DR funds. Policies and procedures also will establish the criteria for determining when the cost of the rehabilitation or reconstruction of the unit will not be cost-effective relative to other means of assisting the property owner.

OHCS will define “demonstrable hardship” in its policies and procedures before carrying out activities that may be subject to the one-for-one replacement housing requirements.

OHCS defines a residential property as “not suitable for rehabilitation” if any of these conditions apply:

- The property is declared a total loss.
- Repairs would exceed 50% of the cost of reconstruction.
- Repairs exceed \$50,000.
- Homes cannot be rehabilitated or reconstructed in place under existing agency policies and award caps due to legal, engineering, or environmental constraints, such as permitting, extraordinary site conditions, or historic preservation.

The State may provide exceptions to award maximums on a case-by-case basis and will include procedures within program guidelines on how the State or its subrecipients will analyze the circumstances under which an exception is needed, and the amount of assistance necessary and reasonable.

4.5.8 Duplication of Benefits

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, generally prohibits any person, business concern, or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster for which such person, business concern, or other entity has received financial assistance under any other program or from insurance or any other source.

To comply with Section 312, OHCS shall ensure that each program and activity provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met.

OHCS and its subrecipients are subject to the requirements in Federal Register notices explaining the duplication of benefit requirement (84 FR 28836 and 84 FR 28848, published June 20, 2019, or other applicable notices).

Grantee



Proposed Use of Funds

5 Grantee Proposed Use of Funds

5.1 Overview

OHCS is the lead agency and responsible entity for administering \$422,286,000 in CDBG-DR funds allocated for disaster recovery. OHCS will implement these programs directly and/or in partnership with subrecipients. The programs were redesigned as part of the Action Plan Amendment #2 and subsequent changes are outlined below. These programs include the following:

Housing

- HARP
- AHD
- Housing Support Services:
 - DPA
 - IHA (moved from Public Services)
 - Housing Counseling Services

Multi-Sector

- PIER

Public Services

- Housing and Recovery Services
- Legal Services

Planning and Administration

- Resilience Planning Program
- Administrative Costs

5.2 Program Budget

	Program	Budget	HUD- Identified MID Budget	Percentage of Allocation	Maximum Award	National Objective
Housing	HARP	\$165,597,567	\$165,597,567	39.2%	Repair/Replace Based on Home Recovery Path. Reimbursement, \$100K	LMI and Urgent Need
	Homeownership Opportunities Program	\$0	\$0			
	AHD	\$127,348,581	\$126,075,095	30.2%	Limited by Allocation	LMI and Urgent Need
	Housing Support Services (includes IHA, DPA, and Housing Counseling Services)	\$47,573,231	\$47,097,499	11.3%	IHA, Based on Household Need and Affordable Rents; DPA Based on Household Need up to \$150,000 or 70% of Purchase Price	LMI and Urgent Need
Infrastructure	PIER	\$45,617,170	\$45,160,998	10.8%	Limited by Allocation	Low- and Moderate-Income and Urgent Need
Public Services	Intermediate Housing Assistance	\$0	\$0			
	Housing and Recovery Services	\$6,017,576	\$5,957,400	1.4%	NA	Low- and Moderate-Income and Urgent Need

	Program	Budget	HUD- Identified MID Budget	Percentage of Allocation	Maximum Award	National Objective
	Legal Services	\$6,017,575	\$5,957,399	1.4%	NA	Low- and Moderate-Income and Urgent Need
Planning	Resilience Planning Program	\$3,000,000	\$2,970,000	.7%	NA	NA
Administration	Administrative Costs	\$21,114,300	\$20,903,157	5%	NA	NA
Total		\$422,286,000	\$419,719,115	100%		

5.3 Connection to Unmet Needs

As required by the Federal Register, [Vol. 87, No. 23, February 3, 2022, OHCS \(87 FR 6364\)](#), [OHCS](#) will allocate at least 80% of the funds to address unmet needs within HUD-identified “most impacted and distressed” (MID) areas. These include Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion counties.

The remaining 20% of the allocation may be used to address unmet needs which are in areas that received a DR-4562 presidentially declared disaster declaration. At this time, the State is limiting the grantee-identified MID areas to Klamath County and anticipates that the majority of the remaining 20% will address unmet needs in the HUD-identified MID areas.

This Action Plan primarily considers and addresses housing and infrastructure unmet recovery and mitigation needs, along with public services and planning that support housing, infrastructure, and economic revitalization unmet needs.

The Federal Register notice also requires that at least 70% of all program funds benefit LMI persons or households. Most of the programs included in the Action Plan include a prioritization for LMI households and individuals; the State anticipates meeting this requirement. The State will closely monitor the impact of State programs and CDBG-DR programs on impacted LMI persons, including vulnerable populations, protected classes, and members of underserved communities. The State also will assess the eligible unmet

needs of LMI and non-LMI persons after all federal, State, and insurance proceeds are considered and may determine whether to request a modification of the requirement through a waiver.

5.4 Leveraging Funds

As a component of this Action Plan, OHCS has coordinated across federal, State, and local organizations to gather information about other resources available for recovering from the 2020 Wildfires. This included data collection on FEMA awards, SBA programs, insurance claims, and the significant funding made available by the State of Oregon. The activities identified in this plan were specifically selected as both eligible CDBG-DR activities and filling a gap that other funding sources could not fill. Utilizing CDBG-DR funding for the most significant eligible needs will leverage other funding sources to invest in varied areas of recovery. It is necessary for OHCS to be knowledgeable about other funding programs to maximize the impact of CDBG-DR funding and ensure compliance with duplication of benefits requirements. Through this compliance, there will be an ongoing effort to identify additional federal, State, and local funding sources while also coordinating with partners such as nonprofits, corporations, foundations, and other stakeholders to maximize leveraging opportunities.

OHCS is committed to using CDBG-DR funds to address critical unmet needs that remain following the infusion of funding from other funding sources detailed below. Existing State resources and other funds from the disaster appropriation will be further examined to ensure that all available and viable funding is utilized where it is most needed and will be leveraged appropriately. OHCS will draw on existing relationships with other agencies, as well as create new partnerships and data-sharing agreements to ensure that there is no duplication of benefits and that all viable resources of funding are leveraged.

5.4.1 State Funding

After the 2020 Wildfires, the State legislature moved quickly to pass legislation and provide State funds to assist wildfire-impacted Oregonians. In October 2020, the State Emergency Board approved more than \$390 million for wildfire recovery and emergency shelters,⁹¹

⁹¹ Oregon State Legislature, Emergency Board Approves More Than \$390 Million for Wildfire Recovery and Emergency Shelters, <https://www.oregonlegislature.gov/courtney/Documents/E%20Board%2010.23.20%20Press%20Release.pdf>

and in July 2021, the Oregon legislature passed House Bill (HB) 5006, which allocated \$486 million to support wildfire recovery.⁹²

HB 5006 provides funding for various initiatives focused on housing; racial justice; wildfires; water; utilities; education; capital improvements; seismic mitigation and recovery; broadband; policy; and support of local, tribal, and non-State projects.⁹³

5.4.1.1 State Housing Funding

Through this funding, the State of Oregon has been increasing its capacity to respond to the needs of impacted residents and communities, with a particular emphasis on vulnerable populations. Some of the key housing initiatives that are being carried out by State agencies are listed in the table below. These agencies collaborate internally and across agencies on a regular basis to ensure that funding is leveraged and administered equitably.

Table 72: Funding Allocated by the Oregon State Legislature for Long-Term Residential Wildfire Recovery in House Bill 5006

Agency	Initiative	Funding
Oregon Department of Environmental Quality	Financial Assistance for Septic System Repair/Replacement	\$15,000,000
Oregon Department of Human Services	Feed and Shelter Wildfire Survivors	\$76,488,018
Oregon Department of Energy	Grant Program to Incentivize Energy-Efficient Rebuilding from the 2020 Wildfires	\$10,831,296
Oregon Housing and Community Services	Wildfire Recovery for Affordable Housing Development, Manufactured Home Replacement, and Flexible Assistance	\$150,163,567
Oregon Department of Consumer and Business Services	Fire Hardening Grants for Wildfire Rebuilds	\$10,678,004

⁹² House Interim Special Committee on Wildfire Recovery, Funding Distribution (2021), <https://olis.oregonlegislature.gov/liz/202111/Downloads/CommitteeMeetingDocument/250450>

⁹³ Oregon State Legislature, House Bill 5006, Emergency Board Work Session Recommendations (2021), <https://olis.oregonlegislature.gov/liz/2021R1/Downloads/CommitteeMeetingDocument/246321>

With the \$150 million that OHCS manages from HB 5006, the agency has implemented several disaster recovery programs and will leverage the successes from these State programs into their management of the CDBG-DR activities identified in this Action Plan.

OHCS is currently administering the Wildfire Recovery and Resilience Account (WRRRA) through eight subrecipients across the impacted counties, making \$25 million available for survivor resources, including temporary and permanent housing solutions. WRRRA's primary mission is to provide rapid rehousing for renters and homeowners displaced by DR-4562. The program launched in the fall of 2021 and will provide ongoing rental assistance and other housing supports through June 2023, unless the program is extended.

In addition, the State has invested in land acquisition in order to be well positioned for future housing development, motel conversion projects to increase available housing, bulk purchase of new modular homes, and the coordination of manufactured home replacement. These State programs have initiated the housing recovery efforts, which the CDBG-DR funds will leverage and expand on.

In addition to leveraging the funding from these programs, the programs from the Oregon Department of Energy and the Oregon Department of Consumer and Business Services support state-of-the-art building practices related to energy efficiency and fire hardening. OHCS is committed to resilient construction practices in all activities funded through CDBG-DR. The goal of this resilient reconstruction is not only to protect resources from future disaster damage but to also set the bar for future development in the State of Oregon. By utilizing CDBG-DR funding for model housing development, including by drawing on best practices from other Oregon programs, these funds will leverage increased building quality for future housing developments long after this recovery effort.

The State's 2022 Notice of Funding Availability (NOFA) for housing tax credits and State and federal programs made additional funds available for the development, rehabilitation, and preservation of affordable housing in disaster-impacted communities. All of the funding sources below are limited to multi-family developments that will preserve long-term or permanent affordability (the Manufactured Dwelling Park Preservation [MDPP] program is a hybrid rental/homeownership program). All funding sources other than MDPP are designed to provide affordable housing for renters or first-time homebuyers in a multi-family setting. Because there are no unmet public multi-family housing recovery needs and because of the significant state investment in multi-family housing summarized in the table below, the State has not allocated additional funding from CDBG-DR for multi-family rental developments.

Table 73: OHCS Program Disaster Set-Asides

Program (Pool)	Funding Sources and Amounts
Wildfire Set-Asides Within OHCS Programs <ul style="list-style-type: none"> Local Innovation Fast Track (LIFT) Rental (\$50 million) LIFT Homeownership (\$15.35 million) General Housing Account Program (\$20 million) 	\$85.35 million, OAHTC**
Oregon Affordable Housing Tax Credits (OAHTC) – Wildfire	\$200 million
Disaster Low-Income Housing Tax Credits	\$6.3 million
Permanent Supportive Housing*	\$10 million for preservation, OAHTC**
Affordable Rental Housing Preservation	\$20 million for preservation, OAHTC**
Manufactured Dwelling Park Preservation	\$25 million, OAHTC**

* For housing acquisition cost only. Must be a property included in the statewide Inventory.

** Up to 95% of the permanent loan amount.⁹⁴

As of the time of publication of the initial Action Plan, the Oregon legislature has appropriated \$71.5 million to address the needs of those experiencing or at risk of experiencing homelessness in communities impacted by the 2020 Wildfires. OHCS, in addition to these funds, has made \$3 million in homelessness services assistance funding available to the Oregon Department of Human Services to assist individuals experiencing homelessness who were adversely impacted by the 2020 Wildfires. Additional details are in the table below.

Table 74: State Resources Allocated to Address Homelessness In Wildfire-Impacted Areas

Wildfires – Source of Funding	Amount of Funding	Purpose of Funding
October 2020 Legislative Emergency Board	\$30,000,000	Supports shelter services through the conversion of hotel and motel properties into safe and warm shelter spaces. Provides funding for 500 units in wildfire-affected areas.
	\$10,000,000	Shelter support with funding priorities for wildfire-affected communities.

⁹⁴ State of Oregon, 2022 NOFA FAQs,

<https://www.oregon.gov/ohcs/development/Documents/nofa/2022/FAQ5-2022-NOFAS-03-04.pdf>

Public Action Plan for Community Development Block Grant Disaster Recovery
(CDBG-DR)

Wildfires – Source of Funding	Amount of Funding	Purpose of Funding
December 2020 Legislative Emergency Board	\$31,500,000	Shelter, food, and wraparound services to Oregonians impacted by wildfires.
OHCS	\$3,000,000	Assistance and services to individuals experiencing homelessness who were adversely impacted by the 2020 Wildfires.
Total	\$74.5 million	

Due to the significant funding invested through the Oregon legislature and the significant funding the State received from the federal government to help address homelessness shelter and support needs, the State has not budgeted CDBG-DR funding directly for expanding sheltering sites. However, CDBG-DR assistance has been budgeted to provide housing counseling, wraparound services, and temporary rental assistance for displaced households experiencing homelessness or at risk of experiencing homelessness as a result of the wildfires.

5.4.1.2 State Infrastructure Funding

Through HB 5006 and Emergency Legislative Board approvals, the State appropriated and allocated additional infrastructure funding to help address those unmet needs not covered by FEMA PA or HMGP or other federal funding sources. A summary of those funds is included below.

Table 75: State Resources Allocated to Address Additional Infrastructure Recovery Needs

Wildfires – Source of Funding	Amount of Funding	Purpose of Funding
HB 5006 – State Funding and American Rescue Plan Act	\$108,825,000	Water and Wastewater Infrastructure
	\$20,000,000	HMGP Match
	\$3,266,000	Municipal Wildfire Assistance Program (local planning capacity)
	\$19,874,000	Fire and Public Safety
Total	\$151,965,000	

In addition to these allocations, the State has appropriated more than \$35 million to help local governments with increasing staffing capacity and revenue loss replacement (e.g., loss of revenue due to lost tax revenue).

5.4.1.3 State Economic Revitalization Funding

Through HB 5006, the State legislature appropriated \$10 million for a main street revitalization program, but this is not specifically for wildfire recovery and therefore is not calculated in the sources of funding available for wildfire economic recovery.

5.4.2 Federal Assistance and Private Insurance

Additional funding sources that are important to document for the purposes of leveraging disaster recovery funds and ensuring duplication of benefits compliance include FEMA, SBA, and private insurance. Data specific to these sources were provided above in the unmet needs assessments. Summary information is provided here to document OHCS's research as it relates to leveraging available funding sources.

Table 76: FEMA Resources Available for DR-4562 Recovery and Mitigation

FEMA Program	Approved Awards and/or Assistance from FEMA	Total Approved Applications
Individual Assistance (IA)	\$38,774,394	3,251
Public Assistance (PA)	\$457,321,493	Project assessments ongoing
Hazard Mitigation Grant Program (HMGP)	\$97,576,243	Project assessments ongoing

Table 77: SBA Resources Available for DR-4562 Recovery

SBA Loan Type	Loan Amount Issued
Residential Loans Approved	\$19,432,309
Residential Loans Executed and Awarded	\$1,993,800
Business Loans Executed	\$1,993,800

Table 78: Private Insurance for Structural and Personal Property Damages

Private Insurance Type of Coverage	Total Loss Claims (Destroyed home and qualified for policy limit)	Total Paid Losses	Case Incurred Losses (Total anticipated replacement costs)
Residential	2,792	\$1,000,274,510	\$1,089,904,743
80% of Residential (assumed for structural payouts)*	2,792	\$800,219,608	\$871,923,794
Commercial	1,331	\$114,163,353	\$359,578,648

* Due to the nature of the insurance data call and the knowledge that many insurance providers have included personal property claims (including a significant number of cars and vehicles) and losses within their policies, the State is assuming for this Action Plan that 80% of the value of the residential insurance losses and incurred losses are for structural damages. The State will use the 80% figure for its unmet needs assessment. The State will update this figure as it receives additional information on insurance claims and payouts through program intake.

5.4.3 Total Unmet Needs After Leveraging Other Funding

The table below reflects the State's current projected unmet need after subtracting these resources from the calculation of need in the Unmet Needs Assessment and Data and Methodology.

Table 79: Oregon 2020 Wildfires Unmet Needs Calculation

Category	Data Source	Total Impact	Resources Available	Unmet Need (Total Impact less Applied Resources)	% of Total
Housing	Estimated Reconstruction or Replacement of Damaged Housing Units	\$1,318,697,000	\$1,126,953,000	\$241,758,000	55%
Infrastructure	FEMA Public Assistance (Categories C-G + 15% resilience)	\$130,533,000	\$102,156,000	\$28,377,000	6%
	FEMA Hazard Mitigation Grant Program	\$129,188,000	\$136,269,000	(\$7,081,000)	(2%)
	Additional Resilient	\$281,965,000	\$131,965,000	\$150,000,000	34%

Category	Data Source	Total Impact	Resources Available	Unmet Need (Total Impact less Applied Resources)	% of Total
	Infrastructure Needs				
Economic Revitalization	SBA – Commercial Loss	\$32,089,000	\$1,994,000	\$29,974,000	7%
	Additional Commercial Losses – Line item not included in the calculation	Assessment still underway	\$124,378,000		
Total		\$1,892,470,000	\$1,499,340,000	\$443,030,000	100%

5.5 Program Partners

OHCS may engage program partners through formal agreements such as subrecipient agreements and interagency agreements and through informal partnerships. It is critical for OHCS to engage a spectrum of program partners so that programs are more accessible, understandable, and tailored to equitably meet the unmet needs of disaster-impacted residents and communities.

When engaging in formal agreements for the administration or implementation of programs, OHCS will ensure that subrecipients have the capacity and expertise to carry out the program activities included in their scope of work. OHCS will perform a risk assessment of subrecipients and program partners. OHCS may help expand subrecipient capacity and will provide technical assistance and training to subrecipients on program requirements, applicable federal cross-cutting requirements and State overlays, and reporting and performance requirements, and may allocate administrative funding, as appropriate, to do so. All subrecipients will be required to comply with 2 CFR 200.318-327.

The program descriptions include the types of subrecipients or interagency partnerships that may support OHCS in the administration or implementation of specific programs.

5.6 Distribution of Funds

OHCS relied on the information collected through the unmet recovery and mitigation needs assessment, to include qualitative and quantitative data received through the public and stakeholder engagement and consultation carried out prior to program development,

including the Governor's Wildfire Economic Recovery Council and the Oregon Disaster Housing Task Force.

Using this information, the State has prioritized programs that will assist in meeting the short- and long-term recovery needs of its residents and communities. In addition, each program will help the State meet its pillars, or guiding principles, of recovery:

- Advancing equity and racial justice and supporting underserved communities.
- Rebuilding homes and communities so that they are more resilient to current and future hazards.

5.6.1 Additional Details in the Program Descriptions

Program descriptions in the Action Plan include a section on the method of distribution for that program. Programs may be administered directly by OHCS through subrecipients, or through a hybrid model where OHCS is the program administrator but assigns specific scopes of work to subrecipients to support OHCS in the administration of the program.

Each program section includes the following information:

- Program description
- How the program promotes equity in recovery and housing for vulnerable populations
- How the program will advance long-term resilience
- Program's national objectives
- Program eligibility
- Program-eligible activities and maximum assistance
- Connection to disaster and unmet needs
- How the program addresses disaster-impacted systems, if applicable
- Program's affordability period, if applicable
- Program's maximum assistance
- Program's definition of "second home," if applicable
- Program's responsible entity
- Program's method of distribution
- Program's competitive application process, if applicable
- Program's estimated beginning and ending dates

The programs established in this Action Plan are not entitlement programs and are subject to available funding.

5.7 Program Income

The State understands that certain activities funded with CDBG-DR funds could result in the generation of program income. OHCS shall develop and adopt specific policies and procedures for each program that generate program income and will specify in those policies whether program income may be retained by local governments, if applicable. Up to 5% of the program income generated by CDBG-DR funds may be used for administrative costs by OHCS, units of local government, or other subrecipients.

Unless otherwise specified, all program income shall be remitted to the State. OHCS shall treat program income as additional CDBG-DR funds subject to the requirements of the Consolidated Notice and shall use it in accordance with the State's CDBG-DR Action Plan.

To the maximum extent feasible, program income shall be used or distributed before additional withdrawals from the U.S. Department of the Treasury are made.

5.8 Resale or Recapture

Resale or recapture requirements will vary by program and may not be applicable to all CDBG-DR programs. If applicable, the resale or recapture requirements are described within each of the program sections below and program guidelines will provide additional details on the terms of resale or recapture and the specific circumstances under which resale or recapture will be used.

OHCS will ensure that affordability restrictions are enforceable and imposed by recorded deed restrictions, covenants, property liens, bylaws, or other similar mechanisms.



Program Details

6 Program Details

6.1 Housing

6.1.1 Connection to Unmet Needs

As described under the Leveraging Funds section, the State has invested significant resources into addressing unmet wildfire housing recovery needs, including for affordable multi-family housing, renters, and individuals experiencing homelessness. Other federal and private insurance resources have been available to some of Oregon's impacted residents. However, these funds are insufficient to meet the State's housing recovery needs. Following an analysis of relative unmet need across single-family, multifamily, owner, and rental housing, the State has determined that the greatest gaps in housing recovery at the time of the initial Action Plan are in the following areas:

- The reconstruction or replacement of damaged housing with more energy-efficient, disaster-resilient, and physically accessible single-family owner-occupied damaged housing, particularly for those who are LMI, under- or uninsured, and have not been able to complete their recovery.
- The need for affordable housing that is more energy-efficient, disaster-resilient, and physically accessible, which can be built in a manner that overcomes the current constraints on available land, urban growth boundaries, and the risks from natural hazards and the impacts of climate change.
- The need for stable and affordable homeownership opportunities for disaster-impacted LMI renters to help households move into more energy-efficient, disaster-resilient, and physically accessible housing; offset rising rents and property sales prices in the disaster-impacted communities; and increase wealth-building opportunities.
- The need for rental and intermediate housing support while disaster-impacted residents complete their permanent recovery plan.
- The need for targeted housing navigation support, including access to legal services, affirmative and culturally specific outreach and engagement, financial and homebuyer counseling, and accessible program design for advancing equity and racial justice through recovery programs.

It is well documented that housing policies⁹⁵ and disaster recovery⁹⁶ across the United States have often favored and disproportionately assisted white and wealthier American citizens and homeowners. The State of Oregon aims to lead an equitable recovery from the 2020 Wildfires, which will require an intentional examination of systemic policies and practices that, even if they appear to be fair, may marginalize some populations and perpetuate disparities.

Through this process, the State will target CDBG-DR support and assistance to ensure that programs meet the needs of:

- *Federally protected class groups*, which include race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability.
- *Underserved communities*, which HUD defines as populations sharing a particular characteristic, as well as geographic communities, which have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life.
- *Vulnerable populations*, which HUD defines as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources.

CDBG-DR funds are subject to the Fair Housing Act, which prohibits discrimination because of race, color, national origin, religion, sex (including gender, gender identity, sexual orientation, and sexual harassment), familial status, and disability. Other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to programs and activities for persons with LEP and taking appropriate steps to effectively communicate with individuals with disabilities by providing auxiliary aids and services.

⁹⁵ NPR, A 'Forgotten History' Of How The U.S. Government Segregated America, <https://www.npr.org/2017/05/03/526655831/a-forgotten-history-of-how-the-u-s-government-segregated-america> and; <https://www.vox.com/22252625/america-racist-housing-rules-how-to-fix>.

⁹⁶ <https://www.nytimes.com/2021/06/07/climate/FEMA-race-climate.html>; <https://www.facingsouth.org/2018/09/recent-disasters-reveal-racial-discrimination-fema-aid-process>.

6.1.2 Action Plan Amendment #2 — Unmet Needs Updated

6.1.2.1 Engagement Efforts To Support Housing Program Launches

Throughout the past year, OHCS launched its pillar programs — HARP and PIER. Additionally, in anticipation of launching more programs, the state has focused engagement efforts with survivors, subrecipients, community-based organizations, and local governments. To support housing efforts specifically, the state held:

- Weekly subrecipient meetings and updates over the past 12 months supporting the HARP launch
- Three in-person public presentations in Lane County with subrecipients, survivors, and community partners
- Three in-person public presentations in Jackson County with subrecipients, survivors, and community partners
- Three virtual public presentations with subrecipients, survivors, and community partners
- Four intake center visits to connect with intake specialists and partners
- Regular outreach and engagement with community action agencies currently serving fire-impacted renter households to provide feedback on IHA program design

In spring 2024, the state conducted additional outreach to disaster-impacted renter households through an online renters survey and to local officials and advocates through HOP committee meetings. The outreach was intended to increase the state's understanding of ongoing housing needs for the impacted renter households in each of the eight MID counties and the capacity and existing resources of the counties to address those needs through housing development.

While affordable homeownership opportunities remain an interest and need of both impacted households and their communities, it became clear that not all households with remaining needs wanted to become homeowners, and some who did needed additional time and support to prepare to become a homeowner. The responses led to many of the changes in this amendment, including increasing the flexibility in the types of affordable housing that could be developed and giving the counties the opportunity to design the plan in each individual county to be more responsive to the needs they are seeing on the ground. Additionally, this feedback informed the decision to combine IHA, DPA, and Housing Counseling Services into one program with multiple pathways to provide assistance to households with remaining unmet housing needs. This eliminated the need for households to submit multiple applications to different ReOregon programs, ensuring

that the programs can coordinate supports for the applicant and increasing the chance of successful housing recovery that meets the household's self-selected housing goal.

6.1.2.2 HARP Updated Analysis

In spring 2024, HARP launched the Eligibility Questionnaire to begin processing and providing intake support to interested applicants. As of the date of this Substantial Amendment, all three application phases have been opened to process interested homeowners. The pool of Eligibility Questionnaire participants painted a picture of homeowners at various stages of their recovery process. As applicants enter the program, further data is collected to determine whether the program pathways and awards are meeting the current recovery needs. Four years after the disaster, several homeowners have cobbled together resources to make their home recovery possible, or otherwise suffered a demonstrated financial hardship to complete their housing recovery, sometimes placing themselves in precarious futures with depleted savings or rainy day funds or risky home financing options that leave households even more vulnerable. Echoing the Action Plan's unmet need, costs of construction and home purchase have continued to rise.

As noted in the original Action Plan, the program continued to review industry trends and analyze cost estimating software, especially as the Action Plan comments and engaged outreach and intake partners highlighted the need to reevaluate the program award caps. Within this Substantial Amendment, the award caps now include purchase and regional multipliers to meet these market needs. The multipliers were derived through an analysis of real estate market trends and publicly available data through 2024 (Redfin), specifically focusing on new construction home and manufactured housing sales data. The data was filtered to include homes similar in size and type to those anticipated under HARP. By examining historical sales data and considering typical developer markups, an estimated purchase allowance multiplier was established that would align the previously determined pricing with current market conditions. This updated pricing also accounts for additional factors influencing home purchase prices, such as site work, geographic location, and local compliance requirements. The final multipliers aim to align the program's assistance with the actual costs beneficiaries faced when purchasing, reconstructing, or rehabilitating a stick-built home or manufactured home.

As HARP launched, the state is focused on helping individuals and families who are still displaced and living in intermediate or unsafe housing. In alignment with the original Action Plan amendment's commitments, the state noted that if there was sufficient funding, it would consider offering reimbursement payments to survivors. Following the decision to open Phase 3 of the application phases, OHCS has determined that it will pursue offering reimbursement as a pathway to address the necessary expenses related to recovery from

the 2020 Labor Day wildfires and straight-line winds based on the funding allocation available within this Substantial Amendment. The original Action Plan and HARP guidance stated that HARP would not be providing reimbursement of incurred disaster recovery expenses. However, at the time of the Eligibility Questionnaire, at least 100 applicants completed the questionnaire only requesting reimbursement support. Based on the feedback from outreach and intake partners, the population of reimbursement needs is greater than those who have applied. Additionally, as we have seen within processed applications, nearly 150 applicants started their recovery process prior to applying and may also benefit from reimbursement support. For this reason, HARP will continue to prioritize vulnerable households by reviewing applicants already being processed due to their incomplete status of repairs. Then the reimbursement period will proceed with LMI applicants who are not already in the application process. Further details on eligibility and award caps are listed below.

6.1.3 Homeowner Assistance and Reconstruction Program

Table 80: Homeowner Assistance and Reconstruction Program Budget, Amendment #2

Program	Budget	Proposed HUD-Identified MID Budget	Proposed Grantee MID Budget
HARP	\$165,597,567	\$165,597,567 100%	\$0 0%

Note: Following program launch, to date, no applicants are currently being processed from the proposed Grantee MID Budget dedicated to Klamath. Thus, the 1% was moved to the HUD-Identified MID Budget. Changes to the program budget are highlighted in the Substantial Amendment budget changes, accounting for a reallocation of \$39 million to other programs, of which \$35.5 million are for other housing programs.

6.1.3.1 Program Description

6.1.3.1.1 Homeowner Assistance and Reconstruction Program

The Homeowner Assistance and Reconstruction Program will provide assistance in the form of grants to eligible homeowners who experienced damage to their homes from the 2020 Wildfires and have remaining recovery needs after accounting for other duplicative benefits received. The program will provide tailored solutions to meet the needs of eligible homeowners at various stages of their recovery process.

The program will fund eligible rehabilitation, reconstruction, acquisition, and replacement costs, including additional costs to comply with federal, State, and local construction standards, such as replacing on-site residential infrastructure, complying with green

building standards, and ensuring that homes are accessible for individuals living with disabilities and senior residents. Eligible costs also include elevation, fire hardening, and other program-required costs that will help protect homes from natural hazards faced in the fire-impacted communities.

The program will also provide reimbursement for eligible rehabilitation, reconstruction, and replacement costs in response to the 2020 Labor Day Disasters. Eligible costs must be processed in accordance with the Federal Register Notice or any applicable waivers and alternative requirements, as well as program requirements and standards.

Participants whose properties are located in an SFHA or a 100-year floodplain, and who receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least 2 feet above the 1% annual chance floodplain elevation (base flood elevation).

Due to challenges surrounding the availability of land and preserved affordable manufactured housing parks in many of the impacted areas, there may be situations where the State needs to rehabilitate damaged manufactured housing parks or engage in new housing or housing development activities. This will help impacted homeowners who were on leased land return or relocate to homes or parks that are affordable, energy-efficient, and resilient in the face of future disasters. In these cases, the State will work with manufactured housing park owners, developers, manufactured home dealers, and/or builders to incentivize development and supplement the cost of developing housing per program construction standards.

6.1.3.1.2 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

The program is designed to prioritize homeowners who continue to face recovery barriers because they have not had access to the resources, support services, and/or capacity to complete their recovery.

The State will achieve this through the following approaches:

- **Implementing a phased approach to applicant processing.** The program is designed to prioritize those individuals and households who have struggled to access the necessary resources to initiate or complete their recovery. By prioritizing LMI households first, the State can ensure that those survivors with the fewest resources are able to initiate their recovery. This approach represents a direct application of OHCS's Targeted Universalism policy. Data show that many of the LMI residents struggling to complete their recovery are Latine, black, indigenous,

and people of color. OHCS will leverage data analysis and engagement through OHCS's Equity Lab, culturally-specific organizations, and local engagement to identify barriers that are disproportionately impacting federally protected classes, underserved communities, and vulnerable populations. Drawing from this analysis, OHCS will target resources and recovery strategies to help overcome recovery barriers experienced by different groups. In future phases, subject to funding availability, the State may expand the program to help higher income households address their remaining unmet recovery needs. Equally, applicants with an incomplete status of repairs may be prioritized for reimbursement before housing-recovered applicants are processed.

Table 81: Application Phases

Application Phases		Phase I	Phase II	Phase III
Household Income	At or below 80% of the AMI	X		
	At or below 120% of the AMI		X	
	Greater than 120% of the AMI			X
Status of Repairs	Incomplete	X	X	X

- Partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations to help bring survivors into the program. Through these subrecipient agreements and partnerships, the State will carry out targeted outreach and engagement to individuals and communities with limited English proficiency, members of protected classes, vulnerable populations, and individuals from underserved communities. The State will work with these organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The State may engage organizations to help with applicant intake and provide support through the application process so applicants can work with local individuals and organizations. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who are skeptical or fearful of government programs and who have not yet participated in State or federal recovery programs.

- Providing funding to public service providers who will provide additional support to applicants through housing and financial counseling and legal services. These programs are described further below. The programs will fund community organizations that provide comprehensive housing navigation, counseling, and legal services to help disaster survivors overcome barriers to accessing recovery resources and sustain affordable housing beyond the life of the CDBG-DR assistance.
- Leveraging supportive housing resources for vulnerable populations by partnering and coordinating with a network of local and state housing providers. OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community-based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will receive additional funding to support housing recovery as subrecipients through HARP, HSS, AHD, and Housing Recovery Services.
- Directly managing the construction process on behalf of applicants and/or providing construction advisory services to applicants. To help safeguard applicants from contractor fraud, price gouging, construction delays, and the time-consuming requirements of managing the housing recovery process, the State will either manage the recovery on behalf of applicants or will provide construction advisory services to applicants as they complete their recovery. When managing the recovery on behalf of applicants, the State may do so either directly or by investing in parks, subrecipients, or local governments through the activities described in On-site and Off-site Improvements for Reconstruction.

- **Review of impediments to fair housing choice.** According to Oregon's 2021 Analysis of Impediments to Fair Housing Choice⁹⁷ and ACS data, people of color disproportionately experience barriers to attaining homeownership in the state of Oregon, including in the impacted counties. Due to this barrier to homeownership, there is a possibility that the Homeowner Assistance and Reconstruction Program could have an unjustified discriminatory effect on or failure to benefit racial and ethnic minorities in proportion to their communities' needs. In order to address this, the State has included significant funding through the AHD and Housing Support Services programs to help disaster-impacted renters access affordable homeownership. The program, which is further described below, identifies barriers to homeownership that have been disproportionately experienced by people of color, indigenous, and Latine households and seeks to overcome those barriers through more inclusive and low-barrier policies and procedures.
- **Increase housing available for seniors and individuals living with disabilities.** In addition, according to the Analysis of Impediments, the highest concentrations of seniors and people with disabilities are in Oregon's rural communities. To help increase the amount of accessible housing stock across the state – including in the most impacted and distressed areas that are rural in nature – all HARP reconstruction and replacement projects will be built to accessibility standards that at a minimum meet Oregon Revised Statute 456.510 visitability requirements.
- **Increase affordable housing choice for people of color, indigenous, and Latine survivors who were living in manufactured housing parks.** As identified in the Analysis of Impediments to Fair Housing Choice members of protected classes, including people of color, indigenous, and Latine individuals face barriers to wealth building opportunities through homeownership and face higher rates of denial from lenders for acquiring homes. Many living in the destroyed manufactured housing parks, particularly in Jackson County where there were the greatest number of homes lost, were Latine families who owned their manufactured home, but leased their lot. They worked in agriculture, service jobs and other low-wage professions. As part of the New Housing Production component of this program, it will be critical to restore damaged manufactured housing parks, create opportunities for resident

⁹⁷ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/Attachment%20B%20-%202021%20Proposed%20FHAP%20Report.pdf>, page 13.

cooperative ownership of parks, and/or acquire and develop new manufactured housing parks that provide affordable and safe housing for wildfire impacted households who were living in manufactured housing parks at the time of the disaster.

6.1.3.1.3 How the Program Promotes Long-Term Resilience

The program will help the State replace damaged or destroyed housing with housing stock that is more energy-efficient, resilient to the hazards in the impacted-communities (including flood, wildfire, earthquake, extreme heat/winter, drought, and other applicable high-risk hazards based on location of the housing), and the projected impacts of climate change. In addition, the replacement housing will be built to accessibility and visitability standards that will allow impacted residents to age in place and increase the housing stock available to individuals living with disabilities.

By building to higher energy efficiency, resilience, and more accommodating construction standards, the State aims to help mitigate future loss of life and property and reduce short- and long-term interruptions caused by future disasters.

Each project will be required to meet resilience performance metrics. Details on how the State will measure, track, and report on resilience performance metrics will be included in program guidelines.

6.1.3.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need (Urgent Need).

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI.

6.1.3.3 Program Eligibility

Geographic Eligibility: Damaged property located in a FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, homeowners must meet the following criteria:

- Must have been the owner-occupant of the damaged property at the time of the disaster.
- The damaged property must have been the applicant's primary residence at the time of the disaster.
- The damaged property must have sustained damages as a result of the 2020 Wildfires.
- The damaged property or replacement property must be an eligible structure as defined in the program guidelines, including, but not limited to, single-family residences, manufactured homes, and pre-fabricated homes. For reimbursement awards specifically, the program may allow for additional eligible structures such as replacement homes in multifamily units.

6.1.3.4 Program-Eligible Activities and Maximum Assistance

Table 82: Homeowner Assistance and Reconstruction Program Eligible Activities

CDBG-DR Eligible Activities	Rehabilitation, reconstruction, reimbursement, elevation, new construction, public facilities, and infrastructure in support of housing development, acquisition, and clearance; homeownership assistance; relocation and rental assistance; legal services. HCDA Section 105(a)1, 2, 4, 5, 8, 11, 14, 24; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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The program provides awards necessary to rehabilitate or replace eligible damaged properties per program standards, as well as to reimburse eligible recovery costs. Each award will be calculated using consistent program construction, energy efficiency, and award calculation standards, which are based on the type of project (ReOregon Managed, Homeowner Managed, or Reimbursement) and the type of replacement unit (e.g., manufactured home, site-built, or modular homes). The actual maximum assistance that each applicant is eligible to receive will be determined using a consistent award calculation methodology described further below.

For each of the types of projects listed below, the program may also fund activities necessary to address site-specific needs such as demolition and removal of the original structure, accessibility needs (e.g., ramps and lifts), environmental issues, on-site residential infrastructure repairs or replacement (e.g., septic tanks and wells), resilience and mitigation measures, elevation requirements, installation and transportation costs, relocation costs, and municipal ordinances, as needed. Depending on the nature of the

activity, the homeowner's project management plan, and the community's development plans, or by the State, local government or a subrecipient on behalf of the applicant. These types of eligible costs may require the program to exceed the program maximum award per applicant.

The necessary and reasonableness of additional assistance will be established using cost estimating software, comparative and market analysis, an analysis of the necessity or value of the improvements, and/or the review of multiple construction bids. Exceptions may be made for such reasons as: to accommodate households with members living with disabilities; households living in rural communities where there is limited access to builders and/or when building costs are higher because of travel costs; or to address other circumstances that OHCS determines to be necessary and reasonable for providing equitable access to program assistance.

If funding is needed for retrofits or repairs to non-energy-efficient, used, or non-program-compliant units, the program will review the cost reasonableness of repairing or retrofitting non-energy-efficient or non-program compliant units and may determine it is more cost effective to replace the unit with a program-compliant energy efficient unit. Purchase of used units, retrofits, and repairs to units will require a pre-award inspection to ensure the unit can be reasonably rehabilitated to meet program standards. Restrictions on the age of used units will be outlined in program guidelines.

Impacted homeowners should not plan on receiving the maximum dollar amounts of assistance included in the sections below, as the State anticipates that on average, actual awards will be much lower than the published maximum award amounts. For all applicants, the State will provide a detailed breakdown of the value of their award.

For both ReOregon-managed and homeowner-managed projects, the program will pay the contractors, vendors, and/or dealers directly and the homeowners will not receive payments from the program for housing activities.

All awards are subject to a duplication of benefits analysis and applicant awards will be reduced by the amounts that are considered to be duplicative. In addition, the program will consider the amount applicants paid in pre-award costs when assessing duplication of benefits. When there is a duplication of benefits, homeowners may be required to contribute the DOB toward eligible costs or agree to a scope reduction to offset DOB; the process around DOB will be included in program guidelines and applicant communications. Exceptions to these standards and eligible expenses may be required, and the exceptions review and approval processes will be further detailed in program guidelines.

ReOregon Managed Projects: Maximum Assistance for Owners of Manufactured or Single-Family Stick-Built Homes

The specific award amount is capped based on the type of unit (e.g., double wide or single wide, size of damaged unit, number of bedrooms, etc.) for which the applicant is eligible, which will be based on the household size or the comparable size of the damaged home, and damaged property type (leased land versus owned land). The program guidelines will include the standards related to energy efficiency and quality of the unit. Not all homeowners will be returning to the site of their damaged units. To accommodate these survivors, exceptions may be made when parks or sites require a specific layout or size of home. When feasible, the State will negotiate bulk orders of homes with pre-approved program floor plans or unit layout specifications. Additional details on eligible units and layouts will be described in program guidelines.

Award Cap: When applicants participate in a ReOregon Managed Project, the program will pay up to 100% of the eligible costs, less duplication of benefits.

Homeowner Managed Projects: Maximum Assistance for Owners of Manufactured and Single-Family Stick-Built Homes

The specific award amount is capped based on the type of unit (e.g., double wide or single wide, size of damaged unit, number of bedrooms, etc.) for which the applicant is eligible, which will be based on the household size or the comparable size of the damaged home, and damaged property type (leased land versus owned land). Projects will be subject to a cost reasonableness review using cost estimating software, comparative and market analysis, and/or the review of multiple construction bids.

OHCS will publish comprehensive construction standards, limitations, and eligible rehabilitation, reconstruction, accessibility, and resilience activities within program guidelines, which will serve as the mechanism for establishing the maximum assistance that an applicant may receive through the program. Not all homeowners will be returning to the site of their damaged units. To accommodate these survivors, exceptions may be made when sites require a specific layout or size of home.

Stick-Built Home Reconstruction Award Cap: This award is up to \$277 per square foot, based on a cost reasonableness analysis as described above. This award cap is inclusive of all elements as outlined in the program guidelines. This price may change as the program reviews industry trends and analysis of actual bids.

Rehabilitation Stick-Built or Manufactured Home Award: The specific award each applicant is eligible to receive is based on the remaining itemized costs to rehabilitate the damaged home to program standards.

Manufactured Home Replacement Award Cap: Awards include the unit's associated costs, such as fabrication, transport, and basic installation.

- Single-wide: \$150,000
- Double-wide: \$277,500

Impacted residents should not plan on receiving the maximum dollar amounts of assistance, as actual awards will be based on unmet need and the State anticipates that on average awards will be much lower than the published maximum award amounts.

Maximum Assistance for Home Purchase of Move-In Ready Homes:

Applicants who are eligible to purchase a move-in ready home in-place can apply for homeownership assistance located at a new site. The program guidelines will outline the criteria for eligible homes, as well as the procedures for unit evaluation and purchase. The program will pay the title or escrow agent directly, and the homeowners will not receive payments from the program. The specific award amount is capped based on the type of unit (e.g., double wide or single wide, size of damaged unit, number of bedrooms, etc.) for which the applicant is eligible, which will be based on the household size or the comparable size of the damaged home, and damaged property type (leased land versus owned land). This price may change as the program reviews industry trends and analysis of actual bids.

Move-In Ready Stick-Built With Land Award Cap: Up to \$316 per square foot, based on cost reasonableness analysis described above.

Move-In Ready Stick-Built Without Land Award Cap: Up to \$277 per square foot, based on cost reasonableness analysis described above.

Move-In Ready Manufactured Home With Land Award Cap:

- Single-wide: \$172,800
- Double-wide: \$319,680

Move-In Ready Manufactured Home Without Land Award Cap:

- Single-wide: \$150,000
- Double-wide: \$277,500

Impacted residents should not plan on receiving the maximum dollar amounts of assistance, as actual awards will be based on unmet need and the State anticipates that on average awards will be much lower than the published maximum award amounts.

Maximum Assistance for Reimbursement Eligible Costs:

Applicants who are eligible and have completed rehabilitation or replacement costs due to the 2020 Labor Day Disasters may apply for assistance to support their recovery process. All eligible expenses will be evaluated and verified through an inspections process and/or verification of eligible receipts or proof of purchase (e.g., bill of sale). The specific award each applicant is eligible to receive is subject to a cost reasonableness review using cost estimating software and comparative and market analysis.

Award Cap: \$100,000

Optional Relocation Assistance for HARP:

Assistance may be provided for households actively participating in HARP who are unable to occupy their home during construction activities. Payments may include moving, storage, deposits, utilities, and rental payments, including hotel payments.

Rental Assistance for Manufactured Home Pad Sites for HARP:

If necessary, assistance may be provided to eligible applicants to secure pad rental sites, through rental payments, until the permanent housing structure is made available for move-in. This is subject to the rental assistance alternative requirements and/or timelines included in the program guidelines.

Flood Insurance Supplemental Award for HARP:

To protect the CDBG-DR investment and enable serving the state's most vulnerable active grantees, the program may provide LMI households that demonstrate a financial hardship with assistance in obtaining their initial-required flood insurance. This assistance will cover the costs of flood insurance premiums for properties covered by the Flood Disaster Protection Act of 1973, as amended, pursuant to 24 CFR Part 570.605 for one year. The one-year term flood insurance premium will be calculated as a supplement to the eligible homeowner's reconstruction or rehabilitation grant, based on a program-evaluated quote.

On-Site or Off-Site Improvements for Reconstruction

The State may undertake directly or through local governments or subrecipients new housing development or production for impacted homeowners who do not own the land on which their damaged property was located. When carrying out these activities, the State, local governments or subrecipients may acquire land for development, and carry out necessary infrastructure development or improvements. In these cases, the State will develop detailed construction standards that comply with State and local building codes and program standards around accessibility, energy efficiency, the grade of construction materials and finishes, structural and on-site resilience improvements, the viability of the project, and on-site preparations. Using these construction standards, the State will select

park owners, developers, builders, and/or dealers to construct new homes or provide manufactured homes. The State may also contract directly with local governments or subrecipients to carry out these activities.

In some cases, damaged housing cannot be replaced or reconstructed until critical water systems or other neighborhood-based infrastructure improvements are complete. OHCS may provide assistance to local governments or other subrecipients to undertake these necessary improvements. The maximum assistance will be based on procurement, a feasibility analysis, and a cost reasonableness review; the State will work with local governments to leverage additional funding whenever feasible.

6.1.3.5 Connection to Disaster and Unmet Needs

Assistance provided under this program is limited to applicants who experienced verifiable damages from the 2020 Wildfires in the FEMA IA-declared counties. This includes seven HUD-identified MIDs (Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion) and one grantee-identified MID (Klamath).

6.1.3.6 Program's Affordability Period

The program's affordability periods are not required for participants whose homes are rebuilt or replaced on privately owned or leased land. No land restrictions, covenants, or liens will be placed on participating properties.

Applicants who move into manufactured housing parks that are publicly subsidized or owned by a resident cooperative, nonprofit, public housing authority, or similar ownership structure may be subject to affordability periods and requirements included in the covenants, tenant agreements, and/or bylaws of those parks. The State will work with these park owners and the applicants to ensure that the program applicants understand the affordability requirements prior to moving into the park.

6.1.3.7 Program's Definition of "Second Home" and Eligibility

Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A second home is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance.

6.1.3.8 Program's Responsible Entity

Administering Entity: The State of Oregon and/or its subrecipients

6.1.3.9 Program's Method of Distribution Description and Overview

The State is the administering entity for the program and will ensure all applicant files are compliant prior to grant execution or award denial. The State may engage subrecipients to support applicants through outreach and engagement, editing and translating program materials for readability, program intake and processing, and/or to provide other related services that facilitate or expedite the application review process. Homeowners will sign a grant agreement with the State prior to receiving assistance from the program.

As described in more detail in program policies and procedures, the State will provide assistance to eligible homeowners for unmet needs related to:

- The replacement, reconstruction, rehabilitation, retrofit of the damaged home on the same site as the damaged home, or alternative site, or
- The replacement of the damaged home and homeownership on an alternative site. The details of how this option will be provided to eligible applicants will be detailed in program policies and procedures.

On-site and Off-site Improvements for Reconstruction for ReOregon subsidized homes

To replace damaged housing in certain locations, the State may need to invest in the development of replacement housing and/or improvements to local infrastructure. To accommodate these situations, the State may provide assistance directly to local governments or subrecipients to carry out these activities that are necessary to rebuild or replace damaged housing. The State will work with local governments or subrecipients to identify and prioritize eligible projects. Allocations will be made based on a review of eligible costs, an analysis of need, and the availability of other sources of funding. PIER or AHD can pay for infrastructure that is related directly or indirectly to housing. There may be a need to invest in infrastructure directly related to damaged housing recovery beyond the resources available in PIER or AHD, and those costs may be covered under HARP.

6.1.3.10 Program's Competitive Application Overview

The program is not a competitive program; however, there will be program phases. Providing funding beyond each application phase or reimbursement period is subject to funding availability.

The State may make direct allocations or competitively select subrecipients or local governments to carry out necessary improvements needed to build housing.

When such services or activities are needed, the State – or the applicable entity - will competitively procure developers or vendors needed to carry out program activities.

6.1.3.11 Program’s Estimated Beginning and Ending Dates

The State launched the program in the first quarter of 2023, after HUD approved the Public Action Plan.

The program will end when all eligible participants have completed closeout, all budgeted funds have been expended, or 6 years after execution of the grant agreement with HUD.

6.1.4 Affordable Housing Development

Table 83: Affordable Housing Development Program Budget, Amendment #2

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Affordable Housing Development	\$127,348,581	\$126,075,095.19	99%	\$1,273,485,81	1%

6.1.4.1 Program Description

Due to rising housing rental and homeownership costs, a lack of available housing, and the relative disaster impacts to renters and damages to single-family housing, the State will help replace destroyed housing stock with affordable housing opportunities for disaster-impacted households. In the original Action Plan, HOP allowed only the development of single-family site-built or pre-fabricated structures—defined as one to four units—for the purposes of selling to eligible disaster-impacted first-time homebuyers. However, upon consultation with local governments in the eight MID counties and after receiving the results of a survey of disaster-impacted renters in the spring of 2024, the state has determined that there is a need and interest for affordable housing all along the housing spectrum from rental to homeownership. Additionally, the available resources within the counties, including land, existing housing, and local capacity for development of housing, vary widely among the eight MID counties.

Therefore, to allow counties to better meet the housing needs of their communities while still offering opportunities for homeownership for first-time homebuyers, HOP is being split

into AHD to focus on new, affordable housing production and a separate program, DPA, to provide more immediate opportunities through homeownership assistance (as further described in Section 6.1.5).

AHD will provide a single subrecipient in each county with an expanded menu of eligible activities, allowing each county to design and administer a program based on its needs, resources, and capacity to create new affordable housing for rental or homeownership through acquisition, demolition, rehabilitation, and new construction (including site-built or prefabricated units). AHD also provides the option to allow for ADUs, homebuyer subsidies, and infrastructure projects necessary for affordable housing development. Projects may be developed by the subrecipient or by other developer partners funded directly or identified competitively and contracted with by the subrecipient. All projects funded through AHD should result in housing that is affordable, energy efficient, and more resilient in the face of future disaster.

- Funds for development may be grants, forgivable loans or repayable loans. If applicable, the forgivable portion of the loan or the grant is subject to recapture in accordance with the receding percentages included in the program guidelines and recorded award. Any payments received through repayable loans will be classified as program income and subject to the requirements of the program income policy outlined in the AHD guidelines.
- The property will be maintained as affordable housing for the duration of a property affordability period. The resale requirements associated with the affordability period will be recorded on the property either as a deed restriction, covenant, through bylaws (if placed in an affordability-regulated manufactured housing park), liens, and/or other means. The program also may take a security interest on any unit or units developed for homeownership or rental, including manufactured homes.
- For homeownership units developed, a subsidy to the homebuyer may be provided where needed for long-term affordability and will be structured as a fully or partially forgivable, zero-interest loan or grant. The award amount and structure will be calculated based on the applicant's household income, other reasonably priced resources available to the applicant for home purchase, and projected costs for maintaining the home and housing costs (e.g., property taxes, homeowner and flood insurance, utilities).
- To provide flexibility for counties to identify additional opportunities for long-term affordable homeownership, direct homeownership assistance may be provided to fire-impacted and/or income-eligible homebuyers of non-AHD units as an alternative or in addition to development of new housing units. Subrecipients may develop their own program using their allocation of AHD funding or return all or a

portion of AHD funds to OHCS to be used for homebuyers in the subrecipient's MID county to be awarded through the appropriate DPA subrecipient. All homeownership assistance should meet the same award considerations as subsidy to homeownership units developed through AHD and must be secured by liens, restrictive covenants, and/or other security instruments for the required affordability period of at least 30 years.

6.1.4.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

This program will replenish damaged housing stock with more energy-efficient, resilient, accessible, and affordable homeownership and rental opportunities for low and moderate income households. According to Oregon's 2021 Analysis of Impediments to Fair Housing Choice and ACS data, members of protected classes, in particular people with disabilities and people of color, experience disparities in rental housing choice, and disaster impacts have only further limited affordable housing options for those households. Additionally, people of color disproportionately experience barriers to attaining homeownership.

Furthermore, within the eight (8) MID counties, affordable housing choice and options vary widely, highlighting the need for flexibility within the AHD program for counties to identify the most impactful ways to meet the housing needs of their fire-impacted residents.

The program is designed to prioritize households who face recovery barriers and other unjustified discriminatory barriers to housing. The State will achieve this through the following approaches:

- **Review of impediments to fair housing choice.** According to Oregon's 2021 Analysis of Impediments to Fair Housing Choice⁹⁸ and ACS data, a shortage of affordable rental housing units disproportionately impacts people of color, persons with disabilities and single parent households in the state of Oregon, including in the impacted counties. People of color, indigenous, and Latine households also disproportionately experience barriers to attaining homeownership. This program seeks to overcome unjustified discriminatory effects on racial or ethnic minorities and will expand opportunities for safe, accessible, affordable, energy-efficient housing for disaster-impacted residents.
- **Development of affordable housing according to each county's needs and resources.** The flexibility for a subrecipient for each of the eight MID counties to design a housing development program that works within their local codes, housing

⁹⁸ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Pages/consolidated-plan.aspx>, page 13.

stock limitations, housing preferences of residents, and availability of resources will provide the most opportunity for each county to be responsive to the needs of their fire-impacted residents and provide housing choice and options.

- **Increase housing available for seniors and individuals living with disabilities.** In addition, according to the Analysis of Impediments, the highest concentrations of seniors and people with disabilities are in Oregon's rural communities. To help increase the amount of accessible housing stock across the state – including in the most impacted and distressed areas that are rural in nature – all AHD new construction projects will be built to accessibility standards that at a minimum meet Oregon Revised Statute 456.510 visitability requirements.
- **Implementing prioritization for tenant/homebuyer selection for homes developed.** The program is designed to prioritize those individuals and households who have struggled to access the necessary resources to initiate or complete their recovery. Therefore, households with a verified residential loss from the eligible disasters will be prioritized for any affordable housing units developed, with a focus on serving survivors with the fewest resources first. Housing assistance under this program is limited to households at or below 120% of the AMI as defined by HUD or a waiver. The prioritization for units will be as follows:
 - LMI households with a verified residential loss from the eligible disasters
 - By prioritizing fire-impacted LMI households first, the state can ensure that those survivors with the fewest resources and greatest impacts are able to recover.
 - Households earning between 80.1% and 120% of the AMI with a verified residential loss from the eligible disasters
 - LMI households without a disaster impact
 - In the event that there are vacant housing units left after extensive outreach and engagement to identify eligible disaster-impacted households as tenants/homebuyers, housing created by the AHD program may be offered to LMI households without a disaster impact. Households over 80% of the AMI who do not have a verified residential loss from the eligible disasters cannot be housed in units funded by CDBG-DR.
- Partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations. Through partnerships, subrecipients will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes, vulnerable populations, and individuals from underserved communities. Subrecipients and their development partners will work with these organizations to ensure that program materials are accessible and

understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. Funding public service providers who will provide additional support to applicants through housing and financial counseling and legal services. These programs are described further below. The programs will fund community organizations that provide comprehensive counseling and legal services to help disaster survivors overcome barriers to accessing recovery resources and sustaining affordable housing beyond the life of CDBG-DR assistance.

- Leveraging supportive housing resources for vulnerable populations by partnering and coordinating with a network of local and state housing providers. OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will receive additional funding to support housing recovery as subrecipients through HARP, AHD, HSS, Housing Counseling and Housing Recovery Services.

6.1.4.1.2 How the Program Promotes Long-Term Resilience

The program will expand the availability of affordable housing stock that is more energy-efficient and resilient to the hazards in the impacted-communities (including flood, wildfire, earthquake, extreme heat/winter, drought, and other applicable high-risk hazards) and the projected impacts of climate change. In addition, the replacement housing will be built to accessibility and visitability standards that will allow impacted residents to age in place and increase the housing stock available to individuals living with disabilities.

6.1.4.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI and up to 120% AMI.

6.1.4.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Subrecipients: Each of the eight MID county governments may determine if they will act as the subrecipient to oversee the AHD program within their county. Alternately, each county may designate another eligible and qualified subrecipient to receive the direct allocation. Eligible designees include a public housing authority, other unit of local government such as a municipality, or a nonprofit. If any county refuses the direct allocation and does not designate a subrecipient in their place, the state will select the county subrecipient for them based on qualifications such as its capacity and experience overseeing large housing projects and familiarity with HUD funding.

Eligible Developers: Subrecipients will outline eligible development partners in their program policies and competitive application documents, where applicable.

Eligible Homebuyer Beneficiaries: To be eligible as a homebuyer for housing developed by the program, applicants must meet the following criteria:

- Must have a household income at or below 120% of the AMI. This income limitation is included in the Consolidated Notice from HUD.
- Any beneficiary with a household income between 80.1% and 120% AMI must have experienced a verified residential loss as a result of the 2020 Wildfires.
- Must be a first-time homebuyer. A first-time homebuyer is an individual who meets any one of the following criteria:
 - An individual who has had no ownership in a principal residence during the 3-year period ending on the date of purchase of the property. This may also include a spouse.
 - A single parent who has only owned with a former spouse while married.

- An individual who is displaced and has only owned with a spouse. A displaced individual is someone whose marital status affects their ability to be properly housed.
- Must agree to the affordability terms, which includes maintaining the property as owner-occupants for a defined period (homebuyer affordability period) and recording a deed restriction on the property to ensure that the property remains affordable to income-eligible homeowners for a defined period in the event of resale (property affordability period).
- Must meet underwriting requirements described in a homebuyer selection plan developed at the time of the project's selection for funding. The underwriting process should review the applicant for such items as the applicant's ability to afford the cost of maintaining a home.

Eligible Rental Beneficiaries: To be eligible as a tenant for affordable rental housing developed by the program, applicants must meet the following criteria:

- Must have a household income at or below 120% of the AMI. This income limitation is included in the Consolidated Notice from HUD.
 - The majority of rental units (minimum of 51% of units in each development) must be rented to eligible LMI households.
- Any beneficiary with a household income between 80.1% and 120% AMI must have experienced a verified residential loss as a result of the 2020 Labor Day wildfires and straight-line winds.
- Non-fire-impacted LMI households earning below 80% of the AMI may be eligible renters but only after extensive outreach and engagement to identify remaining eligible fire-impacted households.

6.1.4.4 Program-Eligible Activities and Maximum Assistance

Table 84: Affordable Housing Development Eligible Activities

CDBG-DR Eligible Activities	Rehabilitation, reconstruction, elevation, new construction, acquisition, clearance, and homeownership assistance; HCDA Section 105(a)1, 4, 5, 8, 11, 14, 15, 24, 26; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Program guidelines will provide significant details on the eligible activities and award calculation process. The State and/or the subrecipient will perform a cost analysis for each project, following the methods described below.

New Housing Production

Subrecipients may use AHD funds for the development of new housing units. Eligible activities related to new housing production include new construction, reconstruction, rehabilitation, lead-based paint evaluation and reduction, and elevation. Additionally, demolition and clearance as well as site work and preparation will be eligible costs when they are necessary to allow for the development of affordable housing.

Homes constructed may be single-family or multifamily, manufactured or site-built, and for rental or homeownership. Construction of ADUs that will be rented at rates affordable to households earning less than 80% of the AMI may also be considered as part of other housing reconstruction/construction or as a separate project to allow for more affordable housing types to serve LMI households, as long as it is secured for an affordability period of no less than eight years.

Subrecipients will develop detailed construction standards for complying with CDBG-DR regulations and State and local building codes and apply these construction standards when identifying projects, competitively selecting contractors for projects, and/or allocating directly to or competitively selecting affordable housing developers. Subrecipients will determine the method of distribution within their written policy.

Subsidies may be provided in the form of a grant or a loan. Loans may be fully or partially forgiven upon meeting award conditions, including completion of the sale or lease of a property to eligible homebuyers or tenants or complying with the long-term affordability requirements. The amount of subsidy provided will be based on an analysis of the market and the project, including the current costs of construction and labor, local demand for construction resources, comparable sales in the area, affordability terms, and affordability calculations for the intended homebuyers.

Acquisition for Affordable Housing Development

Subrecipients may purchase or award AHD funds for the purchase of real property with a plan for redevelopment into affordable housing that will be completed within three years of the purchase. Property purchased may be land only or have residential or nonresidential structures to be cleared or rehabilitated to allow for new affordable housing, with a preference for unoccupied buildings to eliminate displacement. The Uniform Relocation Act will apply for any involuntary purchases of occupied property and will be funded through the subrecipient's AHD allocation. Land-banking is prohibited. Property purchases should be evaluated prior to the purchase based on an analysis of the market and the total project feasibility and cost from purchase through to completion of the new unit(s) and occupancy by an eligible tenant/homebuyer.

On-Site or Off-Site Improvements for Housing Construction or Reconstruction

In some cases, damaged housing cannot be replaced or reconstructed or new housing built until infrastructure such as critical water systems or other neighborhood-based infrastructure improvements are complete. OHCS and/or its subrecipients may provide assistance to local governments or other subrecipients to undertake these necessary improvements. The maximum assistance will be based on procurement, a feasibility analysis, and a cost reasonableness review; the State will work with local governments to leverage additional funding whenever feasible. All infrastructure projects developed with AHD funding must be demonstrated to be necessary for housing construction or reconstruction.

Maximum Project Award: The maximum award is subject to a review of duplication of benefits and cost reasonableness or cost-benefit analysis. No individual project or program award shall exceed the amount of the county allocations.

Homeownership Assistance

Subrecipients may provide a permanent homebuyer subsidy for homeownership units developed under AHD subject to a review of the fair market value of the home and the homebuyer's household income, reasonably priced resources available for the home purchase, and housing costs. Additionally, subrecipients may provide direct homeownership assistance to fire-impacted and/or income-eligible homebuyers of non-AHD units as an alternative or addition to the development of new housing units. Subrecipients may develop their own program using their allocation of AHD funding or return all or a portion of AHD funds to OHCS to be used for homebuyers in the subrecipient's MID county to be awarded through the appropriate DPA subrecipient. All homeownership assistance should meet the same award considerations as the subsidy to homeownership units developed through AHD and must be secured by liens, restrictive covenants, and/or other security instruments for the required affordability period of at least 30 years. Homeownership assistance may only be provided to homebuyers earning at or below 120% of the AMI, as described in the Consolidated Notice.

Flood Insurance for AHD Homeownership:

To protect the CDBG-DR investment and enable serving the state's most vulnerable active grantees, the program may provide LMI households that demonstrate a financial hardship with assistance in obtaining their initial required flood insurance. This assistance will cover the costs of flood insurance premiums for properties covered by the Flood Disaster Protection Act of 1973, as amended, pursuant to 24 CFR Part 570.605, for one year. The one-year term flood insurance premium will be considered an eligible homeownership assistance cost, based on a subrecipient-evaluated quote.

6.1.4.5 Connection to Disaster and Unmet Needs

The program is limited to 2020 Wildfires-impacted individuals and households who were renters, nontraditional homeowners (such as those who own homes that HUD or ReOregon classify as temporary, like RVs), or who meet the other definition of a first-time homebuyer described above. Through this program, OHCS will help address impacted communities' unmet affordable housing recovery needs and help build long-term financial and disaster resilience for impacted renters and first-time homebuyers.

6.1.4.6 Program's Affordability Period

The Consolidated Notice requires a minimum affordability period for new construction of single-family units for homeownership. The State anticipates investing significant resources in the development of new housing through this program and, in return for this investment, will build long-term affordability requirements into the property. However, the State does not want to place an unreasonable affordability period on homebuyers. Therefore, this program will have two sets of affordability periods, which may be different depending on the amount of program assistance provided to the homebuyer:

- Property Resale Affordability Period
- Homebuyer Affordability Period

6.1.4.6.1 Property Resale or Rental Affordability Period

Property resale and/or rental affordability periods will be managed and enforced by the subrecipient or MH Park owner or site developer and will be for a minimum of 30 years. If other state or federal funding sources require longer affordability periods, then the developer or MH Park owner will be required to comply with the longer of the two affordability periods.

Resale Requirements: The resale requirements will be recorded as a deed restriction or covenant on the property (for prefabricated homes placed in affordability-regulated manufactured housing parks, the resale restrictions will be outlined in the bylaws and/or lease agreements). The restrictions for homeownership units will ensure that if the housing does not continue to be the principal residence of the household for the duration of the property period of affordability, the housing will be made available for subsequent purchase only to a buyer whose household qualifies as an LMI household and will use the property as the household's primary residence. Within the program guidelines, loan agreement, and deed restriction or covenant, the State and/or the subrecipient will include language which ensures that the price at resale provides the homebuyer with a fair return on investment and will ensure that the housing will remain affordable to a reasonable

range of low-income homebuyers. It also will include the details on how it will make the housing affordable to a low-income homebuyer in the event that the resale price necessary to provide fair return is not affordable to the subsequent buyer.

When a home is placed in an eligible manufactured housing park, the State will work with the park owner(s) and the homebuyer to ensure that the home and/or site is preserved as affordable for the prescribed period of affordability through bylaws, lease agreements, covenants, and/or other means that accommodate different affordable park ownership structures (community land trusts, resident cooperatives, nonprofits, and public housing authorities).

The State may work with local jurisdictions, nonprofits, community land trusts, housing authorities, or resident cooperatives to manage the resale process and/or ensure that the properties remain affordable for the duration of the affordability period.

Rental Requirements: A 30-year affordability period will apply to rental housing developed by the program, during which time any property owner and/or manager must ensure that a minimum of 51% of the units will be rented to LMI households at rates affordable to households earning below 80% of the AMI as updated annually by the State and/or HUD. The affordability period for rental units will be recorded as deed restrictions to remain with the property even upon resale during the affordability period.

6.1.4.6.2 Homebuyer Affordability Period

The affordability period on the property may be longer than the term of the loan agreement(s) with the program's participating homebuyer.

For forgivable loans, the homebuyer affordability period is tied to the amount of assistance provided for the home, including the supplement to developers for housing construction and any homeownership assistance provided to the applicant.

Table 85: Homebuyer Affordability Period

Homeownership Assistance Amount (including New Housing Production Subsidy)	Homebuyer Period of Affordability (in years)
Less than \$15,000	5
\$15,000 to \$40,000	10
More than \$40,000	15

Recapture Requirements: The award to the homebuyer will be structured as a receding forgivable loan and is subject to recapture in accordance with the receding percentages

documented in the recorded loan. The loan amount due will be reduced on a pro rata basis for the time the homebuyer has owned and occupied the housing measured against the required homebuyer affordability period. For example, if the homebuyer affordability period is 15 years, then 1/15th of the loan will be forgiven after every year of ownership and occupancy of the home as the primary residence by the homebuyer.

6.1.4.7 Program's Definition of "Second Home"

Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A "second home" is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance.

The program will not fund second homes.

6.1.4.8 Program's Responsible Entity

Administering Entity: The State of Oregon, OHCS, and/or its subrecipients

6.1.4.9 Program's Method of Distribution

OHCS will make direct allocations to and enter into agreements with qualified and eligible subrecipients in each county to administer the AHD program directly, reserving some funding for activity delivery. Eligible subrecipients include units of local government, public housing authorities, and/or other qualified public or private nonprofit organizations. OHCS worked with representatives from each of the disaster-impacted counties to develop the method to calculate allocations for AHD. Allocations to each of the eight counties are based on the relative numbers of disaster-impacted renter households in each county with a construction cost multiplier as a percentage of the overall total. Allocations are as follows:

Table 86: AHD Allocations by County

MID County	Percentage of Total AHD Program Allocation	AHD Allocation
Clackamas	6.1%	\$7,747,747
Douglas	2.6%	\$3,275,868
Jackson	48.4%	\$61,591,276
Klamath	0.7%	\$827,848
Lane	13.7%	\$17,483,497

Public Action Plan for Community Development Block Grant Disaster Recovery
(CDBG-DR)

MID County	Percentage of Total AHD Program Allocation	AHD Allocation
Lincoln	7.7%	\$9,774,119
Linn	3.6%	\$4,574,481
Marion	14.4%	\$18,354,528
Total of MIDs	87.1%	\$123,629,364
OHCS Activity Delivery	2.9%	\$3,719,217
Total Program Allocation	100.0%	\$127,348,581

Each county subrecipient will provide details for the selection process and qualifications required for any development partners or contractors in their own county's program policies, ensuring compliance with federal and state procurement standards. OHCS will provide monitoring and broad oversight of subrecipient-administered funds. OHCS will review all projects for CDBG-DR compliance and eligibility, ensuring that they comply with federal requirements, the Action Plan, the Citizen Participation Plan, and program guidelines. Once projects are selected by the subrecipient and reviewed by OHCS, the subrecipient will enter into agreements with those parties. To assist the state's role, additional funds have been allocated for activity delivery support.

This funding is allocated to provide equitable access to eligible disaster-impacted households within each of the MID counties. However, as the program progresses, if funds are underutilized or sufficiently accounted for, the program may reallocate funds to another one of the eight MID counties with additional project costs, and/or the state may directly fund an identified unmet housing recovery need such as Housing Support Services (DPA or IHA).

Homebuyers will execute loan documents with the State or its subrecipient prior to receiving assistance from the program.

On-site and Off-site Improvements for Reconstruction

In some cases in order to replace damaged housing, the State and/or its subrecipients may need to invest in the development of manufactured housing parks, subdivisions and/or improvements to local infrastructure. To accommodate these situations, the assistance may be provided directly to local governments or subrecipients to carry out these activities that are necessary to rebuild or replace damaged housing or develop new housing. The State and/or its subrecipients will work with local governments or subrecipients to identify and prioritize eligible projects. Allocations will be made based on a review of eligible costs, an analysis of need, and the availability of other sources of funding. PIER can pay for

infrastructure that is related directly or indirectly to housing. There may be a need to invest in infrastructure directly related to damaged housing recovery beyond the resources available in PIER, and those costs may be covered under HARP or AHD.

6.1.4.10 Program's Competitive Application Review

The State may make direct allocations or competitively select subrecipients or local governments to carry out program activities to develop affordable housing.

When such services or activities are needed, the subrecipients will competitively procure developers or vendors needed to carry out program activities.

Tenant or homebuyer selection for housing units created by the AHD program will not be competitive; however, prioritization of applicants will be conducted as described above.

6.1.4.11 Program's Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first calendar quarter of 2024, after HUD has approved the Substantial Action Plan Amendment.

The program will end when all activities are construction complete and all resulting units of affordable housing are occupied by eligible tenants or homebuyers, all budgeted funds are expended, or 6 years after execution of the grant agreement with HUD.

6.1.5 Housing Support Services Program

Table 87: Housing Support Services Budget, Amendment #2

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Housing Support Services	\$47,573,231	\$47,097,498.69	99%	\$475,732.31	1%

6.1.5.1 Housing Support Services Description

Based on the feedback received from disaster-impacted households, agencies working on the ground to provide support programs, and the local government representatives and advocates, the state has determined that it will better address remaining unmet needs for impacted households by merging IHA and homeownership assistance originally intended to be provided through HOP, which will now be more broadly provided through DPA. Additionally, HUD Certified Housing Counseling Services is being added to increase support to help households achieve long-term stability and ensure that first-time homebuyers with

barriers to traditional mortgage financing are provided with the resources to successfully achieve their housing recovery goals.

Housing Support Services will allow households to submit a single application to IHA subrecipients to access multiple resources for housing recovery. Applicants will be determined eligible for ReOregon programs and then considered for rental assistance, homeownership assistance, or housing counseling through the appropriate subrecipient agency based on the household's indicated interest and needs, all with the goal of achieving housing recovery.

The three program pathways within Housing Support Services are:

1. IHA, as described in 6.1.5.2
2. DPA, as described in 6.1.5.3
3. Housing Counseling Services, as described in 6.1.5.4

Receiving assistance through one program pathway will not exclude applicants from receiving assistance from another pathway within Housing Support Services. However, households that receive an award from HARP will not be eligible to receive DPA.

6.1.5.2 Intermediate Housing Assistance

6.1.5.2.1 IHA Description

IHA provides assistance to eligible residents located in the 2020 Wildfire-impacted counties who lack the necessary resources or support networks to obtain affordable rental housing or need alternative housing until permanent housing solutions are secured.

The State will provide grants to eligible subrecipients to provide:

- Up to 24 months of rental, temporary relocation, and/or other intermediate housing assistance.
- Housing navigation, case management, and support services to disaster-impacted residents.

6.1.5.2.2 How IHA Promotes Equity in Recovery and Housing for Vulnerable Populations

IHA provides assistance to those individuals and households who are experiencing homelessness, housing instability, or are at risk of experiencing homelessness due to the lack of affordable intermediate housing options. IHA will be designed to ensure that Latine, black, indigenous, and people of color, and other qualifying disaster survivors, who are

unstably housed as a result of the disaster can be housed temporarily until they may benefit from a permanent subsidized housing recovery program.

IHA is designed to prioritize vulnerable populations through the following approaches:

- **Expanding rental housing choice for low- and moderate-income survivors, including for members of protected classes.** Oregon's 2021 Analysis of Impediments to Fair Housing Choice identified members of protected classes, particularly people with disabilities and people of color experience disparities in rental housing choice. While there is limited housing stock available in the disaster-impacted counties, IHA will supplement high rents and will expand housing choice for impacted survivors.
- Partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations to help bring survivors into IHA. Through these subrecipient agreements and partnerships, the State will carry out targeted outreach and engagement to individuals and communities with limited English proficiency, members of protected classes, vulnerable populations, and individuals from underserved communities. While many of these organizations are already working with survivors, the State seeks to expand engagement efforts to identify and help those survivors who have not received adequate wildfire support to move forward in their recovery.
- Leveraging supportive housing resources for vulnerable populations by closely partnering and coordinating with a network of local and state housing providers. OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will

receive additional funding to support housing recovery as subrecipients through HARP, AHD, Housing Support Services, and Housing Recovery Services.

6.1.5.2.3 How IHA Promotes Long-Term Resilience

IHA helps at-risk disaster survivors have access to stable and affordable housing while they work toward their long-term recovery. This intermediate assistance is critical for helping residents preserve personal savings, retirement, and any other assets needed to meet their permanent recovery plan and long-term financial resilience. These resources also will help protect impacted residents from having to take on additional debt, including high-interest and predatory debt that increases the vulnerability of survivors to current and future disasters and household disruptions.

6.1.5.2.4 IHA National Objective(s)

Assistance provided under IHA will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

It may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI.

6.1.5.2.5 IHA Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for IHA, applicants must meet the following criteria:

- **General Eligibility:** Applicants are not required to participate in AHD, DPA, Housing Counseling Services, or HARP to qualify for IHA. However, the following eligibility criteria apply, based on the household's income:
- **Households at or below 80% of the AMI** must face housing instability or have been displaced by the 2020 Wildfires in one of the HUD- or grantee-identified MIDs. Applicants whose households are at or below 80% of the AMI may be eligible for assistance if:
 - They experienced a direct, verified residential loss from the 2020 Wildfires OR
 - Their rents are unaffordable due to the rising rental costs or lack of available affordable rental housing exacerbated by wildfires in the impacted county in which they reside. These applicants are not technically considered "displaced" by the Wildfires, but they do face potential temporary or permanent displacement

from the impacted communities if they are unable to afford rents while the State, local governments, and developers replace damaged housing inventory.

- **Households between 80.1% to 120% of the AMI** must have a direct verified residential loss as a result of the 2020 Wildfires and face housing instability and/or are displaced.

To ensure the program meets the most urgent needs of low-income residents with verified loss from the disaster, the State may implement a phased or prioritized approach that will be published in program policies and procedures.

6.1.5.2.6 IHA Eligible Activities and Maximum Assistance

Table 88: Intermediate Housing Assistance Eligible Activities

CDBG-DR Eligible Activities	Interim housing assistance, rental assistance to displaced homeowners, and relocation assistance, HCDA Section 105(a)1, 4, 8, and 15; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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The State will provide grants to eligible subrecipients to provide:

- Up to 24 months of rental, temporary relocation, and/or other intermediate housing assistance.
- Housing navigation, case management, and support services to disaster-impacted residents.

The maximum amount of assistance an applicant may receive is described below. All awards are subject to a duplication of benefits review.

- **Rental Assistance:** On a monthly basis, for up to 24 months of rental payments, per HUD's Memorandum 23-01. The amount calculated on a monthly basis will be the lesser of:
 - The actual cost of rent
 - The amount needed to make housing costs affordable to the household
 - The maximum applicable HOME/CDBG fair market rents based on the household size, and location
- Temporary Relocation Assistance:
 - The program will pay reasonable costs, including hotel payments, based on rate schedules developed by OHCS. Wherever possible, OHCS will attempt to negotiate lower or bulk rates for disaster survivors.

- Other intermediate housing assistance (e.g., utilities, security deposits, pet fees):
 - Limited to actual costs and a cost reasonableness review from the subrecipient.
 - Refundable security deposits are limited to up to 3 months, subject to State laws listed at https://oregon.public.law/statutes/ors_90.300.
 - Moving costs per the General Services Administration schedule, to be paid up to two times per participant (moving in, moving out).

6.1.5.2.7 IHA's Connection to Disaster and Unmet Needs

The program provides financial and supportive assistance to households displaced by the 2020 Wildfires.

6.1.5.2.8 IHA's Affordability Period

Not applicable.

6.1.5.2.9 IHA's Definition of "Second Home"

Not applicable.

6.1.5.2.10 IHA's Responsible Entity

Administering Entity: The State of Oregon, OHCS, and/or its subrecipients

6.1.5.2.11 IHA's Method of Distribution

The State will make grants to subrecipients able to deliver IHA to disaster-impacted residents. The State will allocate funds based on estimated unmet needs in the impacted communities, estimates from the subrecipients on the number of participants they can serve, and/or subrecipient capacity. Eligible subrecipients include, but are not necessarily limited to, the following:

- Community action agencies
- Culturally specific and community-based organizations (nonprofits)
- Long-term recovery groups (nonprofits)
- Local governments
- Local public housing authorities
- Other nonprofit, quasi-public, or public organizations

6.1.5.2.12 IHA's Competitive Application Review

Not applicable.

6.1.5.2.13 IHA's Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first quarter of 2025, after HUD has approved the Substantial Action Plan Amendment.

The program will end when all funds have been expended and all eligible participants have completed closeout.

6.1.5.3 Down Payment Assistance (DPA)

6.1.5.3.1 DPA Description

Originally included in the Action Plan as a component of HOP tied to the new production of housing, homeownership assistance is being separated from AHD and will become the DPA component of Housing Support Services in order to open the door to homeownership opportunities for LMI residents and fire-impacted households within the eight MID counties.

OHCS will identify eligible and qualified subrecipient DPA program administrators through a competitive process or direct awards. Qualified subrecipients may be homeownership centers, community development financial institutions, public housing authorities, and/or other qualified public or private nonprofit organizations with experience evaluating mortgage loans and underwriting down payment assistance for LMI households.

DPA will be available to first-time homebuyer households earning up to 120% of the AMI living in the MID counties at the time of the disaster and/or currently, with a priority to serve households who are under 80% of the AMI and fire-impacted residents. All households earning between 80.1% and 120% AMI must demonstrate a verified residential loss from the 2020 Labor Day wildfires and straight-line winds. Eligible households may receive up to \$150,000 or 70% of the price to purchase an existing home or manufactured home located in the eight MID counties. Final award amounts will be based on the needs of the households after qualifying for a non-predatory affordable mortgage through either a traditional market lender or a nontraditional lender. Assistance may be used for eligible closing costs and/or toward the purchase price to bring it down to an affordable mortgage amount. Eligibility, underwriting, and home standards will be further detailed in the program guidelines.

6.1.5.3.2 How DPA Promotes Equity in Recovery and Housing for Vulnerable Populations

DPA will provide opportunities for affordable homeownership for low and moderate income households. Affordable homeownership is a critical component of any strategy that

seeks to address both housing and economic prosperity, including for members of protected classes who disproportionately experience barriers to accessing economic opportunity. In the disaster-impacted communities with a shortage of housing, a depletion of residents' resources and rising home prices, fixed home payments will help insulate impacted renters and first-time homebuyers from displacement pressures. Homeownership provides an avenue to build wealth and home equity that can support a household's other financial needs.

Across the income spectrum, communities of color have lower homeownership rates than whites due to historical and ongoing discriminatory lending and disparate access to home financing. Common barriers to homeownership include limited access to capital because of low credit scores and/or credit "invisibility."⁹⁹ These barriers disproportionately impact communities of color in Oregon. According to Oregon's 2021 Analysis of Impediments to Fair Housing Choice¹⁰⁰ and ACS data, people of color disproportionately experience barriers to attaining homeownership in the state of Oregon, including in the impacted counties. In addition, according to the Report on Addressing Barriers to Home Ownership for People of Color in Oregon,¹⁰¹ people of color and Latine households often face barriers from historical discrimination, lack of access to financing, low or no credit history, cultural differences, education and awareness, and legal status.

This approach represents a direct application of OHCS's Targeted Universalism policy, as OHCS aims to remove barriers that facilitate homeownership opportunities for LMI and Latine, black, indigenous, and people of color. OHCS will invest in partnerships with culturally specific organizations to implement aspects of DPA in order to meet this goal.

DPA is designed to prioritize homebuyers who face recovery barriers and other unjustified discriminatory barriers to homeownership. The State will achieve this through the following approaches:

⁹⁹ <https://www.consumerfinance.gov/about-us/blog/who-are-credit-invisible/>

¹⁰⁰ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/Attachment%20B%20-202021%20Proposed%20FHAP%20Report.pdf>, page 13.

¹⁰¹ Joint Task Force Addressing Racial Disparities in Home Ownership, Report on Addressing Barriers to Home Ownership for People of Color in Oregon, December 2019, https://www.oregonlegislature.gov/citizen_engagement/Reports/2019-JARDHO-Addressing%20Barriers%20to%20Home%20Ownership%20for%20People%20of%20Color%20in%20Oregon.pdf

- **Review of impediments to fair housing choice.** According to Oregon's 2021 Analysis of Impediments to Fair Housing Choice¹⁰² and ACS data, people of color, indigenous, and Latine households disproportionately experience barriers to attaining homeownership in the state of Oregon, including in the impacted counties. This program seeks to overcome unjustified discriminatory effects on racial or ethnic minorities and will expand opportunities for safe, accessible, affordable, energy-efficient housing for disaster-impacted residents, including those individuals and households who have been historically excluded from other housing financing and ownership programs by:
 - Providing substantial homeownership assistance award per household to reduce the necessary repayable mortgage loan amount to within reach for LMI households
 - Reviewing first mortgages prior to closing to confirm that the homebuyer will be receiving terms that are non-predatory, including fixed rates and no balloon payments, affordable rates, and escrow processes for, at a minimum, homeowner's insurance and property taxes to better protect the homeowners and preserve the home
 - Partnering with homeownership centers and their lending partners that are critical for opening up homeownership for households who may otherwise not be able to access credit by considering factors such as nontraditional sources of credit and payment history
 - Engaging community-based organizations to support outreach and engagement
 - Providing comprehensive financial and housing counseling through the Housing Counseling Services pathway
 - Making funding available more immediately as an opportunity to possibly leverage homeownership opportunities for fire-impacted households that may be coming online from other OHCS programs
- **Reserving funding based on homebuyer readiness.** DPA is designed to prioritize individuals and households who have struggled to access the necessary resources to initiate or complete their recovery. By setting aside funding for later time frames of DPA, it can provide homeownership opportunities for applicants who may not be eligible upon initial application but who actively engage in financial and/or housing counseling to be able to qualify for a mortgage with the time frames further described in the program guidelines. Assistance under DPA is limited to households at or below 120% of the AMI, as defined by HUD or a waiver.

¹⁰² State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/Attachment%20B%20-%202021%20Proposed%20FHAP%20Report.pdf>, page 13.

- Partnering with local and tribal governments, long-term recovery groups, culturally specific and community-based organizations, community action agencies, disaster case management, and other organizations. Through these subrecipient agreements and partnerships, the State will carry out targeted outreach and engagement to individuals and communities with LEP, members of protected classes, vulnerable populations, and individuals from underserved communities. The State will work with these organizations to ensure that program materials are accessible and understandable to all applicants and that program intake and application processes are accommodating and provided in a manner that accounts for culturally specific needs. The State may engage organizations to help with applicant intake and provide support through the application process. This will provide applicants with options for obtaining support from a trusted support network, which is intended to address potential accessibility challenges for impacted residents who have not yet participated in State or federal recovery programs.
- Funding public service providers who will provide additional support to applicants through housing and financial counseling and legal services. These programs are described further below. The programs will fund community organizations that provide comprehensive counseling and legal services to help disaster survivors overcome barriers to accessing recovery resources and sustaining affordable housing beyond the life of CDBG-DR assistance.
- Leveraging supportive housing resources for vulnerable populations by partnering and coordinating with a network of local and state housing providers. OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562, OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will

receive additional funding to support housing recovery as subrecipients through HARP, AHD, IHA, Housing Counseling Services, and Housing Recovery Services.

6.1.5.3.3 How DPA Promotes Long-Term Resilience

DPA provides homeownership assistance for first-time homebuyers to create opportunities for long-term, stable, affordable housing for those with a higher risk of housing instability. Households will be required to have an affordable mortgage with insurance and property tax costs included through escrow with a total monthly housing payment of no more than 30% of the household income. By requiring a small, affordable mortgage with escrowed funds for taxes and insurance, the program will ensure that the household's investment is protected and that they have enough money left over each month for maintenance, repairs, and savings so that they would have the resources available for recovery in the face of a future disaster.

Additionally, homes purchased will undergo inspection prior to purchase to confirm DPA eligibility as described in the program guidelines.

6.1.5.3.4 DPA National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI and up to 120% AMI.

6.1.5.3.5 DPA Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Beneficiaries: To be eligible for the program, applicants must meet the following criteria:

- Must have a household income at or below 120% of the AMI. This income limitation is included in the Consolidated Notice from HUD.
- Must have experienced a verified residential loss as a result of the 2020 Wildfires for households between 80.1% and 120% AMI.
- Must be a first-time homebuyer. A first-time homebuyer is an individual who meets any one of the following criteria:

- An individual who has had no ownership in a principal residence during the 3-year period ending on the date of purchase of the property. This may also include a spouse.
- A single parent who has only owned with a former spouse while married.
- An individual who is displaced and has only owned with a spouse. A displaced individual is someone whose marital status affects their ability to be properly housed.
- Cannot have received or be determined eligible for and pursuing an award through HARP.
- Must agree to the affordability terms, which includes maintaining the property as owner-occupants for a defined period (homebuyer affordability period) and recording a deed restriction on the property to ensure that the property remains affordable to income-eligible homeowners for a defined period in the event of resale (property affordability period).
- Must meet DPA's underwriting requirements. The underwriting process will review the applicant for such items as the applicant's ability to afford the cost of maintaining a home and will be detailed in the program guidelines.

OHCS will enter into agreements with qualified and eligible subrecipients to administer the homeownership assistance portion in a fiduciary capacity on behalf of OHCS provided that they also meet any additional qualifications and monitoring and administration requirements set forth in the program guidelines. Eligible subrecipients include homeownership centers, community development financial institutions, public housing authorities, and/or other qualified public or private nonprofit organizations.

6.1.5.3.6 DPA Eligible Activities and Maximum Assistance

Table 89: Down Payment Assistance Eligible Activities

CDBG-DR Eligible Activities	Homeownership assistance; HCDA Section 105(a)24; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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- DPA will pay up to the lower of \$150,000 or 70% of the cost of purchasing an eligible new home plus eligible closing costs and fees for eligible applicants based on need, household size, the affordable mortgage amount the household is eligible for through other sources, and the cost of a home that meets program standards.
- The award to the homebuyer will be structured as a fully or partially forgivable, zero-interest loan.

- The award amount and structure will be calculated based on the applicant's household income, other reasonably priced resources available to the applicant for home purchase, projected costs for maintaining the home, and housing costs (e.g., property taxes, homeowners insurance).
- Buyers are required to qualify for a first mortgage or chattel loan to be eligible for the program.
- If applicable, the forgivable portion of the loan is subject to recapture in accordance with the receding percentages included in the program guidelines and recorded loan.
- If applicable, the repayable portion of the loan will be amortized over a period that makes the payments affordable to the homebuyer. The process for determining the amount an applicant must repay will be designed to accommodate different applicant circumstances. This will include procedures for analyzing the following:
 - The projected long-term housing costs (e.g., pad/lot rent, homeowner insurance, property taxes).
 - The ability for the applicant household to access other reasonably affordable capital, such as a market rate first mortgage loan, which can be applied toward the acquisition of the property.
 - The size and composition of the household, which will inform the size, layout, and accessibility components of the home.
 - Other relevant factors that may impact a household's ability to access and/or maintain the home for the period of affordability.

The state or subrecipient may forgive up to 100% of the loan over the course of the 30-year affordability period, with a prorated share forgiven at a rate of one-thirtieth of the loan amount each year. Program guidelines will detail any exceptions processes, including for award amounts and loan terms.

6.1.5.3.7 Connection to disaster and unmet needs

DPA is limited to 2020 Wildfires-impacted individuals and households who were renters, nontraditional homeowners, such as those who own homes that HUD or ReOregon classify as temporary, like RVs, or who meet the other definition of a first-time homebuyer described above. Through DPA, OHCS will help address impacted communities' unmet affordable housing recovery needs and help build long-term financial and disaster resilience for impacted renters and first-time homebuyers.

6.1.5.3.8 DPA's Affordability Period

The award to the homebuyer will be structured as a fully or partially forgivable loan with a homebuyer affordability period of 30 years, requiring the home to remain the homebuyer's primary residence and detailing the recapture of funds if the home is resold during the affordability period.

Recapture Provisions: Any nonrepayable portion of the loan will be structured as a receding forgivable loan and is subject to recapture in accordance with the receding percentages documented in the recorded loan. The loan amount due will be reduced on a pro rata basis for the time the homebuyer has owned and occupied the housing measured against the required homebuyer affordability period. For example, with a homebuyer affordability period of 30 years, one-thirtieth of the loan will be forgiven after every year of ownership and occupancy of the home as the primary residence by the homebuyer.

6.1.5.3.9 DPA's Definition of "Second Home"

Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A "second home" is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance.

The program will not fund second homes.

6.1.5.3.10 DPA's Responsible Entity

Administering Entity: The State of Oregon, OHCS, and/or its subrecipients

6.1.5.3.11 DPA's Method of Distribution

OHCS will enter into agreements with qualified and eligible subrecipients to administer the Down Payment Assistance program in a fiduciary capacity on behalf of OHCS provided that they also meet any additional qualifications and monitoring and administration requirements set forth in the program guidelines. Eligible subrecipients include homeownership centers, community development financial institutions, public housing authorities, and/or other qualified public or private nonprofit organizations.

All eight MID counties will have an initial set-aside for DPA for households within each county through a process of allocation yet to be determined and outlined in the Housing Support Services guidelines. This is intended to ensure equitable access to households from all of the MID counties. However, if no eligible households apply for DPA or a county's set-aside is not enough for the maximum award for one household, that county's set-aside

may be either used for DPA in another MID county or added to the county's AHD allocation to develop affordable housing to serve fire-impacted LMI households.

6.1.5.3.12 DPA's Competitive Application Review

The State may make direct allocations or competitively select subrecipients or local governments to carry out program activities to provide homeownership assistance as further described in the program guidelines.

Homeownership assistance will not be competitive as long as funding remains available to serve eligible households.

6.1.5.3.13 DPA's Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first quarter of 2025, after HUD has approved the Substantial Action Plan Amendment.

DPA will end when all funds have been expended and all eligible participants have completed closeout.

6.1.5.4 Housing Counseling Services

6.1.5.4.1 Housing Counseling Services Description

The third component of Housing Support Services is Housing Counseling Services. As a part of the state's efforts to reduce or eliminate barriers to homeownership for LMI households and others facing housing instability following the 2020 Labor Day wildfires and straight-line winds, Housing Counseling Services will be provided by HUD-certified housing counselors to help households on their path to housing recovery and long-term stability.

Housing counselors are employed by HUD-approved housing counseling agencies (HCAs) and trained to provide education and coaching to consumers around every aspect of housing, including the homebuying process, financial literacy, foreclosure prevention, and homelessness.

OHCS will select HUD-approved HCAs as subrecipients through a competitive process to provide support to ReOregon program applicants and participants in all eight MID counties. While a focus for the Housing Counseling component is to help disaster-impacted households achieve homeownership or renters meet their stabilized housing goals through IHA, DPA, and AHD, Housing Counseling Services will also be available to participants in HARP as needed and may be offered as a stand-alone service for applicants who are determined to be ineligible for other ReOregon pathways.

6.1.5.4.2 How Housing Counseling Services Promotes Equity in Recovery and Housing for Vulnerable Populations

Housing counselors are a valuable resource in assisting disaster-impacted households in their recovery, in particular those with additional challenges or barriers to accessing stabilized housing. They can work one-on-one with households to identify housing needs and goals, outline actionable steps to achieve those housing goals, and work with those individuals on milestones. They have additional expertise in working through financial challenges that may keep households from being able to access credit through traditional lenders to achieve homeownership. As reported in Oregon's 2021 Analysis of Impediments to Fair Housing Choice¹⁰³ and ACS data, people of color, indigenous individuals, and Latine households disproportionately experience barriers to attaining homeownership in Oregon, including in the impacted counties. By incorporating Housing Counseling Services, the program seeks to knock down some of those barriers, providing access to the benefits of homeownership for the first time, especially when paired with the additional resources provided through DPA, IHA, and AHD.

Participants will also be able to complete the required Homebuyer's Education component for DPA.

6.1.5.4.3 How Housing Counseling Services Will Advance Long-Term Resilience

A large component of housing counseling includes helping households understand how to maintain their homes and protect their investment through homeowners insurance and on-time payments. Additionally, many households work through financial components to use budgeting and increase savings, all of which help to ensure households are more able to recover in the face of a future disaster.

6.1.5.4.4 Housing Counseling Services National Objective

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the urgent need national objective to provide assistance to eligible applicants with incomes greater than 80% AMI.

6.1.5.4.5 Housing Counseling Services Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

¹⁰³ State of Oregon Analysis of Impediments to Fair Housing Choice, June 15, 2021, <https://www.oregon.gov/ohcs/development/Documents/Attachment%20B%20-%202021%20Proposed%20FHAP%20Report.pdf>, page 13.

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, applicants must meet the following criteria:

- Must be displaced or facing housing insecurity in one of the HUD- or grantee-identified MIDs; or
- Be referred from another ReOregon program.

6.1.5.4.6 Housing Counseling Services Eligible Activities and Maximum Assistance

Table 90: Housing Counseling Services Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a)8, 15, and 19; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Assistance will be provided to eligible HUD-approved HCA subrecipients in the form of grants to deliver the following types of services:

- Performing outreach and engagement to understand impacted participants' unmet needs
- Assessing housing needs, financial resources, and other concerns about short- and long-term housing
- Providing Homebuyer Education and other courses identified as needed to support recovery for program participants
- Connecting with state and local recovery resources
- Communicating with lenders, insurance companies, government agencies, and other ReOregon programs, including IHA, DPA, AHD, and HARP
- Providing financial counseling services, including reviewing income, expenses, credit, and debt and helping to develop ways to improve a participant's financial situation
- Providing other housing counseling services

The maximum amount that can be allocated to the subrecipient will be detailed in program guidelines and determined based on such factors as the subrecipient's capacity, location, and/or the communities served by the organization.

6.1.5.4.7 Housing Counseling Services Connection to Disaster and Unmet Needs

The program provides services to individuals and households living in communities affected by the 2020 wildfires and straight-line winds.

6.1.5.4.8 Housing Counseling Service's Affordability Period

Not applicable.

6.1.5.4.9 Housing Counseling Service's Responsible Entity

Administering Entity: Oregon and/or its subrecipients

6.1.5.4.10 Housing Counseling Service's Method of Distribution

The state may implement Housing Counseling Service directly and/or through subrecipients. While the state intends to mainly enter into agreements with subrecipients, there may be regions or communities in the disaster-impacted areas where services may only be available through the state.

Housing Counseling Service policies and public funding announcements will provide information on how qualified subrecipients will receive grants to provide services to eligible residents.

Eligible subrecipients may include homeownership centers, culturally specific or community-based organizations, long-term recovery groups, and/or other nonprofit organizations certified by HUD to provide housing or financial counseling services to applicants.

The state may allocate funds to eligible organizations based on their capacity, location, and/or the communities served by the organization.

6.1.5.4.11 Housing Counseling Service's Competitive Application Review

Not applicable.

6.1.5.4.12 Housing Counseling Service's Estimated Beginning and Ending Dates

The state anticipates that the program will begin in the first quarter of 2025, after HUD has approved the Substantial Action Plan Amendment.

Housing Counseling will end when all funds have been expended and all eligible participants have completed closeout, or six years after execution of the grant agreement with HUD.

6.2 Multi-Sector

6.2.1 Planning, Infrastructure, and Economic Revitalization Program

Table 91: Planning, Infrastructure, and Economic Revitalization Budget, Amendment #2

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Planning, Infrastructure, and Economic Revitalization Program	\$45,617,170	\$45,160,998.30	99%	\$456,171.70	1%

6.2.1.1 Program Description

The program will provide direct county allocations for local governments, non-profit organizations, school districts, public housing authorities, and other public or quasi-public entities in the eight most impacted counties to address the unmet infrastructure, planning, and economic revitalization needs that fall within their counties. While budgetary allocations will be made at the county level, counties and organizations within the impacted areas will work together to define the specific projects or programs to be funded. Each infrastructure, economic revitalization, and planning activity must clearly have a tie to revitalizing disaster impacted communities by directly or indirectly supporting:

- New housing and/or replacement of damaged housing, and/or
- The mitigation of loss of life or property in the face of current and future natural hazards.

Note: in the original draft Action Plan, this program was designed as a competitive infrastructure program. During the public engagement process local governments and organizations shared their concerns around the timing of when funding would be available to meet their communities' needs. They expressed the need to know how much funding would be available for their communities so they could start planning out those projects. Many of the projects need to be completed in order to accommodate housing recovery. Additionally, local organizations and governments shared information around the unmet economic revitalization needs necessary for communities to recover. Based on this feedback, this program was modified to provide direct allocations and to allow for planning, infrastructure, and economic revitalization activities.

6.2.1.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

The State will require applicants to describe how their projects provide the essential public infrastructure necessary for housing and/or will protect life and property, including for members of protected classes, HUD-identified vulnerable populations, and historically underserved communities. While there are no Racially and Ethnically Concentrated Areas of Poverty from the AFFH mapping tools within the fire-impacted areas, the State will work with subrecipients to review their projects to determine if they would have an unjustified discriminatory effect on members of protected classes, HUD-identified vulnerable populations, and historically underserved communities.

Construction projects – including those carried out by subrecipients - will be subject to Section 3. The State will provide technical assistance and training to local organizations to help them achieve Section 3 goals and to the greatest extent feasible, and consistent with existing federal, State, and local laws and regulations, ensure that employment and other economic opportunities be directed to low- and very low-income persons and business concerns that provide opportunities to low- or very low-income persons, particularly those who are recipients of government assistance for housing or residents of the community in which the federal assistance is spent.

6.2.1.1.2 How the Program Promotes Long-Term Resilience

Eligible projects include those that mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. Applicants will be required to demonstrate how the projects will be operated and maintained beyond the life of the CDBG-DR grant.

Each project will be required to meet resilience performance metrics. Details on how subrecipients and the State will measure, track, and report on resilience performance metrics will be included in program guidelines.

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities. Applicants will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards, and how that evaluation is incorporated into the design of their project or program.

6.2.1.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation benefits within the HUD- or grantee- identified MID. Each approved application will describe the urgency, type, scale, and location of the disaster-related impact that will be addressed through the project.

6.2.1.3 Program Eligibility

Geographic Eligibility: Eligible entities located in one of the FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: Eligible applicants include, but are not limited to, the following:

- Tribal, State, county, and municipal governments, agencies, districts, and authorities
- Schools (K-12)
- Public housing authorities
- Other public or quasi-public entities
- Nonprofit organizations authorized to carry out CDBG-DR eligible activities, including but not limited to those with a specific public role described in an Oregon revised statute (e.g., soil and water conservation districts)

6.2.1.4 Program-Eligible Activities and Maximum Assistance

Table 92: Disaster Resilience Infrastructure Program Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a)1, 2, 4, 5, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 22; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364) and other applicable notices or guides, other applicable waivers or alternative requirements
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This program is designed to allow for a flexible range of eligible activities to help local entities meet the planning, infrastructure, and economic recovery or mitigation needs of their disaster-impacted communities. Each planning, infrastructure, and economic revitalization activity must clearly have a tie to revitalizing disaster impacted communities by directly or indirectly supporting:

- New housing and/or replacement of damaged housing, and/or
- The mitigation of loss of life or property in the face of current and future natural hazards.

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities. Subrecipients will be required to describe the data and/or planning analysis they used in their project prioritization process, including how their projects address the following opportunities, as applicable:

- Support members of protected classes, historically underserved communities, vulnerable populations
- Are designed to mitigate hazard risk, including climate-related natural hazards
- Protect public health
- Conserve lands, waters, and biodiversity
- Address environmental injustice
- Spur economic growth and create jobs

Maximum Project or Program Award: The maximum award is subject to a review of duplication of benefits and cost reasonableness or cost-benefit analysis. No individual project or program award shall exceed the amount of the county allocations within the Method of Distribution section below.

6.2.1.5 Connection to Disaster and Unmet Needs

This program addresses unmet recovery and mitigation planning, infrastructure, and economic revitalization needs in HUD-identified and grantee-identified MIDs, after deducting any duplication of benefits from other federal, State, or private sources.

6.2.1.6 How the Program Will Address Disaster-Related Systems

As described in the Unmet Needs Assessment, there are many planning, infrastructure and economic revitalization needs resulting from the 2020 Wildfires that were not covered

by FEMA PA or HMGP, SBA, or other state resources. Many of the infrastructure needs may be due to lack of funding or because of the limitations placed by FEMA on what can be replaced with Public Assistance funds.

These program funds must be used to replace damaged systems or build new systems that will help protect life and property and can withstand future disasters and the impacts of climate change.

6.2.1.7 Program's Responsible Entity

Administering Entity: Subrecipients.

6.2.1.8 Program's Method of Distribution

OHCS will make direct county allocations and will engage subrecipients to implement and manage individual projects or programs. OHCS will provide monitoring and broad oversight of subrecipient administered funds. OHCS will review all projects and programs for CDBG-DR compliance and eligibility, ensuring they comply with federal requirements, the Action Plan, the Citizen Participation Plan, and program guidelines. OHCS calculated allocations to each of the 8 counties based on relative infrastructure, small business, and housing damages, and mitigation needs. The methodology and data used to calculate the allocations are included in the program guidelines. As part of the Substantial Amendment, the initial funds were distributed to the eight counties, necessitating a reallocation to cover the costs of state review oversight and support for the proposed projects.

Table 93: PIER County Allocations, Amendment #2

MID County	Percent of Total PIER Program Allocation	PIER Allocation
Clackamas	5.7%	\$ 2,415,826
Douglas	5.7%	\$ 2,399,446
Jackson	32.9%	\$ 13,849,117
Klamath	4.0%	\$ 1,703,097
Lane	18.8%	\$ 7,926,980
Lincoln	6.4%	\$ 2,684,967
Linn	7.4%	\$ 3,110,691
Marion	19.1%	\$ 8,027,045
Total of MIDs	92.33%	\$ 42,117,170
OHCS Activity Delivery	7.67%	\$3,500,000
Total Program Allocation	100%	\$45,617,170

For each county allocation, a regional body will be established with representatives, at a minimum, of the municipal and county governments, the economic development district, and the long-term recovery group. Members of the regional body will select eligible CDBG-DR planning, economic revitalization, and/or infrastructure projects for OHCS approval. OHCS will enter into individual grant agreements with each entity responsible for implementing the approved project or program.

OHCS review will consider whether a) the project is sufficiently and clearly defined and b) meets eligibility standards. This approach will allow local governments and organizations within the eight impacted counties to start budgeting and finalizing the plans for their recovery and mitigation projects immediately.

OHCS will coordinate and consult with State partners, such as OEM, Oregon Department of Transportation (ODOT), Business Oregon, DLCD, and the Department of Environmental Quality (DEQ), when applicable, to ensure that recovery and mitigation projects are coordinated with other related infrastructure programs.

6.2.1.9 Program's Competitive Application Review

Not applicable.

6.2.1.10 Program's Estimated Beginning and Ending Dates

The State began the program in the third quarter of 2023, after HUD approved the Public Action Plan.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

6.2.1.11 How Mitigation Set-Aside Activities will Meet Definition of Mitigation?

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities. Applicants will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards.

If projects do not have a clear recovery tie to DR-4562, then applications will have to clearly describe how the proposed activity will increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. Each mitigation-only project must: (1) Meet the definition of mitigation activities; (2) address the current and

future risks as identified in the grantee's mitigation needs assessment in the MID areas; (3) be CDBG-eligible activities under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement; and (4) meet a national objective.

6.2.1.12 How Mitigation Set-Aside Activities will Address Current and Future Risks

The application for each project or program funded through PIER will be required to incorporate information from the state's natural hazards mitigation plan and the applicable local or regional hazard mitigation plans to demonstrate how the project or program will be designed to address current and future risks.

6.3 Public Services

6.3.1 Housing and Recovery Services

Table 94: Housing and Recovery Services Budget

Program	Budget	Proposed HUD-Identified MID Budget		Proposed Grantee MID Budget	
Housing and Recovery Services	\$6,017,576	\$5,957,400	99%	\$60,176	1%

6.3.1.1 Program Description

OHCS may administer the Housing and Recovery Services Program directly or by awarding grants to homeownership centers, nonprofit organizations, or other qualified subrecipients to deliver housing and financial counseling and housing navigation services to impacted residents to help in their transition to more permanent housing. Services also may be provided to small rental property owners who provide affordable housing to income-qualified tenants. Services may include homeowner education, renter counseling, homebuyer education, financial literacy, credit rehabilitation, debt management, budgeting, homelessness counseling, avoiding fraud and scams, applying for public and private resources, foreclosure prevention strategies, and relocation counseling, among other services tailored to fit the participants' needs.

6.3.1.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

Disaster-impacted households are facing monumental challenges and are making life-changing decisions related to housing and their household finances. Due to the pressures

from FEMA, insufficient insurance, confusing application processes, lack of affordable housing, and other circumstances, many households are forced to make quick decisions, even as they are reeling from the shock and confusion that always accompanies a disaster. These quick and short-term decisions can have long-term consequences, particularly for those impacted residents with access to the fewest resources and Oregon's most vulnerable populations.

Disaster Case Managers and Housing Navigation providers will help impacted residents, vulnerable populations, and members of underserved communities expedite their recovery by carrying out the following activities, which are intended to help overcome barriers that restrict access to opportunity:

- Performing outreach and engagement to understand impacted participants' unmet needs, including specific needs faced by Latine, black, indigenous and people of color and individuals living with disabilities, and other individuals and households who continue to struggle to recover.
- Assessing housing needs and financial resources and addressing other concerns about short- and long-term housing.
- Discussing the unique assistance needs and resources available.
- Connecting with State and local recovery resources.
- Communicating with lenders, insurance companies, and government agencies on behalf of applicants, when requested and approved by the applicant.
- Supporting application intake and assisting with the necessary paperwork for recovery programs.
- Reviewing income, expenses, credit, and debt and helping to develop ways to improve a participant's financial situation.
- Creating a personalized action plan.
- Providing other housing navigation services.
- Providing financial counseling services to owners of small rental properties who will rent housing at affordable rates to income-qualified tenants.
- Leveraging supportive housing resources for vulnerable populations by partnering and coordinating with a network of local and state housing providers. OHCS will leverage other state and federal assistance to address the special needs of persons who are not experiencing homelessness but require supportive housing (e.g., elderly, frail elderly, persons with disabilities (mental, physical, developmental, formerly incarcerated persons, etc.), victims of domestic violence, persons with alcohol or other substance-use disorder, persons with HIV/AIDS and their families, and public housing residents. Since the first months of the recovery from DR-4562,

OHCS has been partnering with – and in many cases providing funding for – Community Action Agencies, Continuums of Care, disaster case managers, Oregon Department of Human Services, community-based organizations, and other partners to provide wraparound services and other supports in conjunction with housing recovery. These local partners fulfill a critical function in Oregon as coordinators who pull together voluntary additional support services for vulnerable populations. While CDBG-DR funds are not being provided directly for these special services, OHCS has used state funds to expand the capacity of many of the organizations that provide or facilitate supportive housing solutions, and many will receive additional funding to support housing recovery as subrecipients through HARP, AHD, HSS, and Housing Recovery Services.

6.3.1.1.2 How the Program Promotes Long-Term Resilience

The program helps at-risk disaster survivors have access to stable and affordable housing. This assistance is critical for helping residents plan for current and future housing costs, access recovery programs, complete the required paperwork, and gain the support needed to drive their recovery in a way that makes them more resilient to future disasters and disruptions.

6.3.1.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible applicants with incomes greater than 80% AMI.

6.3.1.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, applicants must meet the following criteria:

- Must be displaced or facing housing insecurity in one of the HUD- or grantee-identified MIDs.

6.3.1.4 Program-Eligible Activities and Maximum Assistance

Table 95: Housing and Recovery Services Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a)8, 15, and 19; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Assistance will be provided to eligible subrecipients in the form of grants to deliver the following types of services:

- Performing outreach and engagement to understand impacted participants' unmet needs.
- Assessing housing needs, financial resources, and addressing other concerns about short- and long-term housing.
- Discussing unique assistance needs and the resources available.
- Connecting with State and local recovery resources.
- Communicating with lenders, insurance companies, and government agencies.
- Supporting application intake and assisting with the necessary paperwork for recovery programs.
- Reviewing income, expenses, credit and debt, and helping to develop ways to improve a participant's financial situation.
- Creating a personalized action plan.
- Providing other housing navigation services.
- Providing financial counseling services to owners of small rental properties who will rent housing at affordable rates to income-qualified tenants.

The maximum amount that can be allocated to the subrecipient will be detailed in program guidelines and will be determined based on such factors as the subrecipient's capacity, location, and/or the communities served by the organization.

6.3.1.5 Connection to Disaster and Unmet Needs

The program provides services to individuals and households living in 2020 Wildfires-impacted communities.

6.3.1.6 Program's Affordability Period

Not applicable.

6.3.1.7 Program's Responsible Entity

Administering Entity: The State of Oregon and/or its subrecipients

6.3.1.8 Program's Method of Distribution

The State may implement this program directly and/or through subrecipients. While the State intends to mainly enter into agreements with subrecipients, there may be regions or communities in the disaster impacted areas where services may only be available through the State.

The program policies and public funding announcements will provide information on how qualified subrecipients will receive grants to provide services to eligible residents.

Eligible subrecipients may include homeownership centers, culturally specific or community-based organizations, long-term recovery groups, and/or other nonprofit organizations qualified to provide housing or financial counseling services to applicants.

The State may allocate funds to eligible organizations based on their capacity, location, and/or the communities served by the organization.

6.3.1.9 Program's Competitive Application Review

Not applicable.

6.3.1.10 Program's Estimated Beginning and Ending Dates

The State began the program in the third quarter of 2023, after HUD approved the Public Action Plan.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

6.3.2 Legal Services

Table 96: Legal Services Budget

Program	Budget	Proposed HUD- Identified MID Budget		Proposed Grantee MID Budget	
Legal Services	\$6,017,575	\$5,957,400	99%	\$60,176	1%

6.3.2.1 Program Description

Through the Legal Services Program, OHCS will provide funding to qualified legal aid and/or legal services providers to deliver the assistance necessary to help impacted residents transition to more permanent housing.

6.3.2.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

In the aftermath of a disaster, legal services are a critical component of comprehensive disaster relief. Legal resources are often unattainable and/or unaffordable to Latine, black, indigenous, and people of color, HUD-defined vulnerable populations, and LMI households as they work through the challenges of recovery that require legal representation, support, and/or analysis. Failure to resolve these legal issues often results in the denial of recovery resources and/or delays to recovery; these delays and denials disproportionately impact communities of color and individuals with limited English proficiency.

This program will help vulnerable populations overcome many of these challenges and overcome barriers that restrict access to recovery opportunities through the following types of legal services:

- Replacing identification papers.
- Working through insurance claims.
- Clearing property titles and working through heirship and probate.
- Fighting unlawful evictions and foreclosures.
- Combating contractor scams and fraud.
- Assistance with school transfers.
- Obtaining emergency child custody, visitation, support, and other court orders requiring modification as a result of displacement, injury, or job loss.
- Other legal services related to recovery.

6.3.2.1.2 How the Program Promotes Long-Term Resilience

The program helps at-risk disaster survivors secure stable and affordable recovery housing that is more resilient to future disasters. This assistance is critical for helping residents navigate the legal challenges that serve as barriers to recovery and maintain legal access to their recovery housing.

6.3.2.2 Program's National Objective(s)

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need.

The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% AMI.

6.3.2.3 Program Eligibility

Geographic Eligibility: FEMA IA-declared counties for DR-4562:

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

Eligible Applicants: To be eligible for the program, applicants must meet the following criteria:

- Must be a renter or homeowner actively participating in one of the other CDBG-DR housing programs, including IHA, AHD, DPA, HARP, and Housing and Recovery Services, and have a household income at or below 120% AMI.

6.3.2.4 Program-Eligible Activities and Maximum Assistance

Table 97: Legal Services Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a) 8; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Assistance will be provided to eligible subrecipients or OHCS-contracted legal services providers to deliver the following types of assistance:

- Replacing identification papers.
- Working through insurance claims.
- Clearing property titles and working through heirship and probate.
- Fighting unlawful evictions and foreclosures.
- Combating contractor scams and fraud.
- Assistance with school transfers.

- Obtaining emergency child custody, visitation, support, and other court orders requiring modification as a result of displacement, injury, or job loss.
- Other legal services needed for applicants to complete their recovery through one of the other CDBG-DR programs.

6.3.2.5 Connection to Disaster and Unmet Needs

The program provides services to individuals and households impacted by the 2020 Wildfires.

6.3.2.6 Program's Affordability Period

Not applicable.

6.3.2.7 Program's Responsible Entity

Administering Entity: The State of Oregon, OHCS, and/or its subrecipients

6.3.2.8 Program's Method of Distribution

The State may administer the program directly and/or through subrecipients. While the State intends to mainly enter into agreements with subrecipients, there may be regions or communities in the disaster impacted areas where services may only be available through the State.

6.3.2.9 Program's Competitive Application Review

The program policies or public funding announcements will provide information on how qualified providers will receive awards to provide eligible services to eligible applicants.

The State may allocate funds to eligible subrecipients and/or competitively procure service providers.

6.3.2.10 Program's Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first calendar quarter of 2025.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

6.4 Planning and Administrative Costs

6.4.1 Resilience Planning Program

Table 98: Resilience Planning Program Budget

Program	Budget	Proposed HUD- Identified MID Budget		Proposed Grantee MID Budget	
Resilience Planning Program	\$3,000,000	\$2,970,000	99%	\$30,000	1%

6.4.1.1 Program Description

Through the Resilience Planning Program, the State will carry out regional and statewide recovery, resilience and mitigation planning, which may include, but is not limited to, the following:

- Housing development strategies, including developing construction standards, facilitating the development of affordable housing and removing barriers to affordable housing
- Public land use and infrastructure policy and planning
- Public resilience and preparedness policy and planning
- Increasing resilience to the impacts of climate change
- Protecting public health
- Addressing environmental injustice
- Spurring economic growth and creating jobs

6.4.1.1.1 How the Program Promotes Equity in Recovery and Housing for Vulnerable Populations

To receive funding under this program, the State seeks to address historic and systemic barriers, environmental injustice, or other limitations faced by HUD-defined vulnerable populations, underserved communities, individuals and households with LEP, protected classes, and communities of color.

The planning and technical assistance process is intended to be inclusive and reflective of those with lived disaster experience, housing insecurity, and/or economic insecurity. The State will design and implement an inclusive planning process that incorporates feedback and input in a manner that is equitable and representative of the residents living in the impacted areas.

This level and type of inclusive community planning is designed to help recovering communities and the State incorporate the affordable and resilient housing needs of vulnerable populations in long-term recovery and resilience planning.

6.4.1.1.2 How the Program Promotes Long-Term Resilience

Each jurisdiction experienced the 2020 Wildfires differently, with some rural communities facing a lack of public infrastructure and losing more than half of their residential or commercial population, and others facing reconstruction needs in more urban areas. In addition, many communities have existing plans that need to be supplemented or enhanced with additional analysis, while others have a need for new planning to rebuild their communities in a manner that can withstand future disasters.

This program is designed to promote sound, sustainable long-term recovery resilience and planning that accounts for the unique hazards, opportunities, housing stock, economic revitalization, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Oregon's impacted communities.

The State will identify the following opportunities, as applicable, within each of their plans:

- Increasing resilience to the impacts of climate change.
- Protecting public health.
- Conserving lands, waters, and biodiversity.
- Addressing environmental injustice.
- Spurring economic growth and creating jobs.

6.4.1.1.3 How will Program Address Current and Future Risks/Mitigation Needs Assessment

Each plan created under this program will account for or include considerations of current and future risks and mitigation needs.

6.4.1.2 Program's National Objective(s)

Planning activities are presumed to meet a national objective under the requirements at 24 CFR 570.208(d)(4).

6.4.1.3 Program Eligibility

Geographic Eligibility: As described in the introduction of this Action Plan, 20 out of Oregon's 36 counties were included in the disaster declaration under FEMA DR-4562. These

counties were eligible for different FEMA programs based on the impacts of the disaster, as demonstrated in Figure 1. Wildfire county burn scars identified impacts across the state, as seen in Figure 2. To comprehensively plan for statewide resilience — as listed in the original action plan — the geographic eligibility will include all counties. A statewide plan ensures that resilience strategies account for the interdependencies between the MID counties and adjacent regions, addressing upstream and downstream vulnerabilities that a localized plan may overlook. This will encourage a more effective plan for both the state and the MID counties, with more comprehensive, coordinated strategies that demonstrate broader impact and collaboration.

Eligible Applicants: Eligible applicants may include, but are not limited to:

- State agencies

6.4.1.4 Program-Eligible Activities and Maximum Assistance

Table 99: Resilience Planning Program Eligible Activities

CDBG-DR Eligible Activities	HCDA Section 105(a)8, 9, 12, 16, and 21, administration costs, applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364), other applicable waivers or alternative requirements
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Assistance may be used for regional and statewide recovery, resilience and mitigation planning, which may include, but is not limited to, the following:

- Housing development strategies, including developing construction standards, facilitating the development of affordable housing and removing barriers to affordable housing
- Public land use and infrastructure policy and planning
- Public resilience and preparedness policy and planning
- Increasing resilience to the impacts of climate change
- Protecting public health
- Addressing environmental injustice
- Spurring economic growth and creating jobs

6.4.1.5 Connection to Disaster and Unmet Needs

To ensure a comprehensive and holistic statewide plan, the planning activities will encompass all communities across Oregon while addressing the communities that were impacted by the 2020 Wildfires.

6.4.1.6 Program's Responsible Entity

Administering Entity: The State of Oregon

6.4.1.7 Program's Method of Distribution

The program will be implemented by the State, in close coordination with local, state, and regional entities.

6.4.1.8 Program's Competitive Application Review

Not applicable.

6.4.1.9 Program's Estimated Beginning and Ending Dates

The State anticipates that the program will begin in the first quarter of 2025, after HUD has approved the Public Action Plan Amendment.

The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

6.4.2 Administrative Costs

Table 100: Administrative Costs Budget

Program	Budget	Proposed HUD- Identified MID Budget		Proposed Grantee MID Budget	
Administrative Costs	\$21,114,300	\$20,903,157	99%	\$211,143	1%

6.4.2.1 Program Description

The costs necessary for the general administration of the CDBG-DR grant include, but are not limited to, the State and subrecipient's staff time administering programs; compliance and monitoring of the State's subrecipients, vendors, and other recipients of funding; and other costs specified as eligible administrative expenses in 24 CFR 570.206.

Up to 5% of the overall grant and any program income may be used for administration of the grant, inclusive of administrative costs incurred by OHCS and its subrecipients.

6.4.2.2 Program Eligibility

Table 101: Administrative Costs Eligible Activity

CDBG-DR Eligible Activities	Program administrative costs, defined at 24 CFR 570.205 and 570.206, and any applicable waivers or alternative requirements
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Eligible Recipients: State and eligible subrecipients carrying out CDBG-DR programs

The icon for the Appendix section consists of three vertical bars in green, brown, and orange.

Appendix

7 Appendix

7.1 Certifications

- The grantee certifies that it has in effect and is following a residential antidisplacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- The grantee certifies its compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms, if required by Part 87.
- The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be administered with funds under this notice are consistent with its Action Plan.
- The grantee certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Act, as amended, and its implementing regulations at 49 CFR Part 24, except where waivers or alternative requirements are provided for in this notice.
- The grantee certifies that 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 135.
- The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- Each State receiving a direct award under this notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.

- The grantee certifies that it is complying with each of the following criteria:
 - Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the MID areas for which there is a presidentially declared disaster in 2020 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed in order to give the maximum feasible priority to activities that will benefit LMI families.
 - The aggregate use of CDBG-DR funds shall principally benefit LMI families in a manner that ensures that at least 70% of the grant amount is expended for activities that benefit such persons.
 - The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds by assessing any amount against properties owned and occupied by LMI persons, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title, or (b) for the purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- The grantee certifies that it will conduct and carry out the grant 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, and that it will affirmatively further fair housing.
- The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require units of general local government that receive grant funds to certify that they have adopted and are enforcing:
 - A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations, and
 - A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

- Each State receiving a direct award under this notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its applicable Public Law Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced therein and its Implementation Plan and Capacity Assessment and related submission to HUD referenced therein.
- The grantee will not use grant funds for any activity in an area identified as floodprone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as an SFHA (or 100-year floodplain) in FEMA's most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR Part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K, and R.
- The grantee certifies that it will comply with the environmental requirements at 24 CFR Part 58.
- The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

7.2 Waivers

7.2.1 Use of Standardized Area Median Income

Public Law 117-43 authorizes the Secretary of HUD to waive or specify alternative requirements for any provision of any statute or regulation in connection with HUD's obligation or use by the recipient of these funds. Pursuant to the Housing and Community Development Act, 42 U.S. Code 5302(a)(20), the State of Oregon requests a Secretarial waiver of regulations under PL 117-43 to set the minimum Area Median Income (AMI) requirements at Clackamas County's annual AMI – adjusted yearly – for those communities impacted by DR-4562 with AMI limits below that of the Clackamas limits, including when

used to calculate 80 and 120 percent of the AMI. The State believes it is consistent with the overall purposes of Title I of the HCDA in seeking this waiver.

This waiver is consistent with similar HUD waivers provided to the US Virgin Islands and the State of Texas, following their respective 2017 disasters, as provided in the Omni Notice, 85 FR 60821. The notice can be found [here](#) and the specific waivers are found on these pages:

- III. Public Law 115-31, 115-56, 115-123, 115-254, and 116-20 Waivers and Alternative Requirements *Use of Standardized Area Median Income (State of Texas Only)* – Page 60824
- VI. Public Law 115-56, 115-123, and 116-20 Waivers and Alternative Requirements *Use of Standardized Area Medium Income (U.S. Virgin Islands Only)* – Page 60826

Per the applicable federal register notices, AMI is generally - though not explicitly - defined using the county as the area of interest and serves as eligibility criteria (80 percent or 120 percent of the AMI, depending on the eligible activity) for programs that provide homeowner assistance, affordable rental assistance, homeownership assistance, and buyout or incentives. To meet the low-and moderate-income expenditure requirements of the CDBG-DR grant, 70 percent of grant funds must be spent on activities that provide a benefit to persons at or below 80 percent of AMI. However, the range of LMI across the impacted counties is quite large, from a low of \$57,450 in Douglas and Klamath counties to a high of \$85,200 in Clackamas County. Of the 8 most impacted and distressed counties that experienced impacts to homes, 7 counties have AMI limits below that of Clackamas' limit. The table below compares the county limits of the HUD and Grantee-identified most impacted and distressed counties' low- and moderate-income (LMI) limits – or 80% of AMI – compared to that of Clackamas County LMI limit.

Table 102: Difference between 2022 Clackamas County 80% AMI Limit and Other FEMA IA Impacted Counties' 2022 CDBG 80% AMI Limits

	Percentage Difference between Clackamas and Other IA County 80% AMI Limits								
		1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Clackamas		59,650	68,200	76,700	85,200	92,050	98,850	105,650	112,500
		Dollar Difference Between Clackamas and Other IA County CDBG 80% AMI Limits							
Douglas	-33%	(19,400)	(22,200)	(24,950)	(27,750)	(30,000)	(32,200)	(34,400)	(36,650)
Jackson	-28%	(16,850)	(19,300)	(21,700)	(24,100)	(26,050)	(27,950)	(29,850)	(31,800)
Klamath	-33%	(19,400)	(22,200)	(24,950)	(27,750)	(30,000)	(32,200)	(34,400)	(36,650)
Lane	-25%	(15,050)	(17,200)	(19,350)	(21,500)	(23,250)	(24,950)	(26,650)	(28,400)

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	Percentage Difference between Clackamas and Other IA County 80% AMI Limits								
		1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Clackamas		59,650	68,200	76,700	85,200	92,050	98,850	105,650	112,500
		Dollar Difference Between Clackamas and Other IA County CDBG 80% AMI Limits							
Lincoln	-33%	(19,400)	(22,200)	(24,950)	(27,750)	(30,000)	(32,200)	(34,400)	(36,650)
Linn	-29%	(17,550)	(20,100)	(22,600)	(25,100)	(27,100)	(29,100)	(31,100)	(33,150)
Marion	-26%	(15,350)	(17,600)	(19,750)	(21,950)	(23,700)	(25,450)	(27,200)	(29,000)

Source: HUD CDBG LMI Limits

As a point of reference, the table below compares the counties with the statewide AMI limit:

Table 103: Difference between 2022 Statewide 80% AMI Limit and 2022 CDBG 80% AMI Limits Across DR-4562 FEMA IA Impacted Counties

	Percentage Difference between State and County 80% AMI Limits								
		1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Oregon Statewide Limit		50,850	58,150	65,400	72,650	78,500	84,300	90,100	95,950
		Dollar Difference Between State and the County CDBG 80% AMI Limits							
Clackamas	17%	8,800	10,050	11,300	12,550	13,550	14,550	15,550	16,550
Douglas	-21%	(10,600)	(12,150)	(13,650)	(15,200)	(16,450)	(17,650)	(18,850)	(20,100)
Jackson	-16%	(8,050)	(9,250)	(10,400)	(11,550)	(12,500)	(13,400)	(14,300)	(15,250)
Klamath	-21%	(10,600)	(12,150)	(13,650)	(15,200)	(16,450)	(17,650)	(18,850)	(20,100)
Lane	-12%	(6,250)	(7,150)	(8,050)	(8,950)	(9,700)	(10,400)	(11,100)	(11,850)
Lincoln	-21%	(10,600)	(12,150)	(13,650)	(15,200)	(16,450)	(17,650)	(18,850)	(20,100)
Linn	-17%	(8,750)	(10,050)	(11,300)	(12,550)	(13,550)	(14,550)	(15,550)	(16,600)
Marion	-13%	(6,550)	(7,550)	(8,450)	(9,400)	(10,150)	(10,900)	(11,650)	(12,450)

Source: HUD CDBG LMI Limits for county, HUD Income User for Statewide

The AMI varies significantly between counties, but the cost to rebuild or reconstruct a new home does not vary on the order of magnitude as shown in income limits across the impacted counties, if at all.

- Manufactured Homes:** More than half of the damaged homes in DR-4562 were manufactured homes. Manufactured homes provided affordable homeownership options for lower income households pre-disaster, but these same households do not have the resources to replace damaged manufactured homes in today's market,

particularly since many of the homes destroyed were older manufactured homes that were drastically underinsured. Nonetheless, the costs of manufactured homes are consistently increasing across Oregon. Based on data gathered in October 2021 during the unmet needs assessment, it was estimated that it will cost on average \$77,000 to replace destroyed single wide and \$144,000 to replace double wide manufactured homes – **regardless of where residents live in Oregon because all of Oregon is included in the Western Region for manufactured home sales.** This information was aggregated by reviewing the real costs 15 fire survivors were paying for manufactured homes through the State’s Manufactured Home Replacement Program. This average cost did not include site prep or the costs to replace damaged septic systems and wells. Since that analysis was performed, the Manufactured Home Replacement Program team performed additional analysis and found that MH costs continue to increase. This analysis is supported by the Federal Reserve Bank of St. Louis, which shows that as of December 2021, the average sales price of new manufactured homes in the US Western Region was \$76,900 for a single wide and \$170,600 for a doublewide.¹⁰⁴ These costs are up from the December 2020 averages of \$64,500 and \$115,000, respectively. Based on feedback during the Action Plan public hearings from survivors who have purchased manufactured homes since February 2022, these costs have risen even further. The rising costs of manufactured homes – while still more affordable than stick-built homes – are felt consistently across the disaster impacted communities and are substantiated and summarized in the table below.

Table 104: Average Sales Price of New Manufactured Homes in the Western Region

	Single Wide	Percent Increase (Decrease)	Double Wide	Percent Increase	Data Source
December 2019	\$52,100	—	\$107,600	—	US Census Bureau
December 2020	\$64,500	23.8%	\$115,000	6.9%	Federal Reserve of St. Louis
August 2021	\$79,000	22.5%	\$143,000	24.3%	US Census Bureau
October 2021	\$77,000	(2.5%)	\$144,000	0.7%	OHCS Manufactured Home Replacement Loan Program : Wildfire Recovery Sample
December 2021	\$76,900	0%	\$170,600	18.5%	Federal Reserve of St. Louis
March 2022	\$88,073	14.5%	\$172,647	1.2%	Oregon Manufactured Housing Association (OMHA)
Total Increase from Dec 2019 to Mar 2022		69.0%		60.5%	

¹⁰⁴ Federal Reserve of St. Louis Economic Data, Average Sales Price of New Manufactured Homes by Region and Size of Home, December 2021, <https://fred.stlouisfed.org/release/tables?rid=471&eid=1194074#snid=1194087>

- **Site-built Homes:** As of quarter 1 2022, according to the RS Means Location Oregon cost indices and weighted factors, which represents relative construction costs across regions and states, the counties with the lowest LMI limits (Douglas, Klamath, and Lincoln) have factors of 101.9 (Douglas - based on Eugene factor), 100.4 (Klamath - based on Klamath Falls factor), and 103.1 (Lincoln - based on Salem factor). Some additional data points on the RS Means Location factors highlight the need to standardize income limits across the impacted areas:
 - The area with the highest LMI limit (Clackamas) has a factor of 102.7 (based on Portland factor).
 - The Portland (Clackamas) factor is lower than the Salem (Marion) factor, meaning it is more expensive to build in Marion than it is in Clackamas. However, Marion's LMI income limits are 26% lower than those in Clackamas. It is also important to note that just over 60 single family homes were destroyed in Clackamas County, while over 600 single-family homes were destroyed in Marion County.
 - The other two counties with significant single-family housing losses (Jackson [610] and Lane [505]) have RS Means Location Factors of 100.9 (Medford) and 101.9 (Eugene), respectively, or 1.8% and 0.8% lower than the Portland (Clackamas) factor. However, the income limits in Jackson and Lane Counties are 28% and 25% lower than the Clackamas income limits.
 - For a 1,600 square foot home at standard grade built in RS Means, this translates into construction costs ranging from \$229,700 in Klamath to \$239,000 in Salem, with the other regions coming in around \$230,000. **This 4% range in estimated construction costs is much smaller than the 25-33% difference between Clackamas and the other county 80% AMI income limits in the most impacted and distressed counties.**

Like many other parts of the country, Oregon faces challenges related to construction, supply chain disruptions, and increased labor and material costs. Construction costs have increased since the September 2020 wildfires, forcing many lower income property owners to postpone rebuilding. The construction industry, one of the fastest-growing sectors of the state economy is facing a labor shortage. Contractors report they continue to have a difficult time hiring skilled worker positions and expect it to remain difficult for the next year. This shortage has been amplified by the COVID-19 fueled recovery spending that led to a construction boom and recovery efforts across the country. This has resulted in an average two-year timeline for completing a single-family stick-built home.

If the State uses the AMI income limits for each county, the recovery programs could disproportionately impact the eligibility of Latine persons and households to participate in CDBG-DR housing programs. While the State is still collecting demographic information on survivors, local governments, community organizations and the Oregon Department of Human Services have reported there were a disproportionate number of Latine survivors in destroyed manufactured housing parks, particularly in Jackson County where the greatest number of homes were damaged or destroyed. Based on sample surveys, many of these survivors worked in agriculture, service jobs and other low-wage professions, which could put their households just above the respective 80% or 120% of AMI limits, but do not provide enough income to replace destroyed manufactured homes in today's market. As described in the Analysis of Impediments to Fair Housing Choice, Latine households face additional barriers in accessing homeownership programs and credit, which can be addressed through CDBG-DR if applicants income-qualify for housing programs. By using the higher Clackamas limit, it will be less likely there will be a disproportionate impact of eligibility on recovering Latine survivors.

Prior to the COVID-19 pandemic and 2020 Wildfires, the State experienced significant increases in housing costs and a severe housing shortage. The statewide median home value rose by 40% (around \$100,000) between 2010 and 2018. Similarly, the median rent also increased by nearly \$300 (just above 40%) during the same period.¹⁰⁵ The most current vacancy data available for the State indicates a 4% rental vacancy rate and a sales vacancy rate around 1.3%. Oregon lacked sufficient housing to meet the demand for relocation or temporary housing generated by the disasters, which has increased the cost of living in the disaster impacted counties from rising rents and costs to replace or repair damaged housing.

The State represents that granting this waiver will allow it to more effectively serve the residents that are financially burdened and who need CDBG-DR assistance to be able to recover under the current conditions. OHCS is actively designing their recovery programs. While this waiver request is critical for helping lower- and moderate-income households across the impacted areas who are struggling to recover, the State will prioritize very low and extremely low-income vulnerable populations through program outreach, intake, and the additional supports provided through CDBG-DR and state-funded housing counseling, legal services, permanent supportive services, and the intake processes through the CDBG-DR homeowner and renter programs. Additional information on these strategies is outlined

¹⁰⁵ State of Oregon, 2021–2025 Consolidated Plan,
[https://www.oregon.gov/ohcs/development/
Pages/consolidated-plan.aspx](https://www.oregon.gov/ohcs/development/Pages/consolidated-plan.aspx), p.119

in the program sections of the Action Plan and will be further detailed in program guidelines.

Prompt approval of this waiver will help provide certainty and guidance to impacted residents and communities who continue to undertake recovery efforts.

7.2.2 Assistance for Privately-Owned Utilities

While 24 CFR Part 570.201(l) allows for using CDBG funds to assist privately-owned activities, in [Section III.G.3 of the Consolidated Notice](#) HUD has prohibited the use of CDBG-DR funds to assist a privately-owned utility for any purpose.

In *Basically CDBG for States*, April 2021, Chapter 6, **HUD defines a private utility:**

- A privately-owned utility may be defined as a publicly-regulated service provided through the use of physical distribution lines to private properties and that is owned and operated by a non-public entity.
- Utilities include, but are not necessarily limited to, natural gas, electricity, telephone, water, sewer, and cable television services.

After consulting with HUD, providing assistance to a non-profit or cooperatively owned utility can be done through subrecipient agreements, where the State would treat them similarly to local governments or other public or quasi-public entities. This applies to non-profit and cooperatively owned electric, water, and sewer utility providers, including when those providers service a wide area and when the utilities are limited to residents of non-profit or cooperatively owned manufactured housing parks.

Therefore, this waiver focuses on providing assistance to *for-profit* privately-owned utilities.

7.2.2.1 Rehabilitation of damaged affordable manufactured housing parks

7.2.2.1.1 Context

Many manufactured housing parks were damaged in DR-4562. Manufactured homeowners living in parks often fall within the category of “owner” because they own their home, but they are considered tenants of the park because they rent the lot or pad. OHCS seeks to invest in manufactured housing parks when at least 51% of the lots will be rented at affordable rates to households at or below 80% of the area median income, per program guidelines. This may include parks owned by private, for-profit entities. The water, sewer and electrical systems of the manufactured housing parks were commonly destroyed by the fires. For these parks to return and for them to maintain affordable rents for their former and new tenants, many need assistance with rehabilitating those systems.

7.2.2.1.2 Waiver Request

The State is requesting HUD waive the prohibition to assist privately-owned utilities in [Section III.G.3 of the Consolidated Notice](#) for for-profit affordable manufactured housing parks when at least 51% of the residents are at or below 80% of the AMI and are charged affordable rents, provided the park meets the following conditions:

- The park owner(s) must agree to tenant income and rent affordability restrictions as required by Consolidated Notice requirements and per program processes of recording and enforcing those requirements. At a minimum, the affordability period will be in compliance with HOME Investment Partnerships Program (HOME) requirements at 24 CFR 92.252(e).
- The State will underwrite the project financials and determine whether the park owner(s) can reasonably finance all or a portion of the infrastructure improvements that would be considered “privately-owned utilities.” The State will ensure that CDBG-DR assistance will not result in an unreasonable return on investment for the park owner(s).
- Only if the owner(s) cannot fund these improvements with other reasonable sources will the state pay for costs that may be considered “privately-owned utilities.”

7.2.3 Extension of Rental Assistance

OHCS requested a waiver from HUD to allow for the provision of rental and other eligible intermediate housing assistance for up to 36 months. Through [Memorandum 23-01](#), HUD approved a waiver for the provision of rental assistance (e.g. rent, security deposits, and utility deposits) and utility payments for up to 24 months. Existing CDBG regulations allow these payments to cover rent and utilities for a short period of time as a public service activity under 42 U.S.C. 5305(a)(8), but these payments cannot extend for so long that they no longer qualify as an eligible public service activity. As described in the Leveraging Funds section of the Action Plan, the State is investing over \$300 million of state funding into the redevelopment or new development of affordable multi- and single-family housing in the impacted counties. This housing will come online in the next 2-4 years, but during this time, residents residing in the impacted communities face unaffordable rents.

Following the 2020 Wildfires and Straight-line Winds, many Oregon residents were forced to abandon their residences and may be unable to return when damages to the units have made them uninhabitable. These households are considered to be “displaced” by the disaster are eligible for up to 42 months of rental assistance, per the waiver in the Consolidated Notice.

However, there are additional low-and-moderate income households who have been indirectly impacted by the destruction of housing and could be forced to move from the impacted communities due to the lack of affordable rental housing options in the impacted counties. Of the 4,326 homes impacted by the 2020 wildfires, all but 54 of them were completely destroyed. According to the FEMA IA data, 41% of the impacted residents with verified losses were renters, and so the State can reasonably assume that around 40% of the damaged and destroyed units were rental properties. The total loss of this housing has placed additional demands on areas that were already facing an affordable housing crisis before the wildfires. As such, as demonstrated in the table below, rents have considerably increased in the impacted counties from 2020 to 2022.

Table 105: 2020-2022 FMR Percent Change

	2020-2022 FMR Percent Change				
County	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Clackamas	18.79%	17.30%	16.05%	13.63%	10.59%
Douglas	9.44%	7.48%	7.36%	5.68%	-0.44%
Jackson	13.17%	14.65%	14.57%	12.76%	11.69%
Klamath	7.07%	6.94%	7.04%	7.83%	16.60%
Lane	7.76%	7.28%	6.63%	5.01%	7.89%
Lincoln	11.08%	8.00%	8.89%	6.58%	6.73%

	2020-2022 FMR Percent Change				
County	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Linn	12.07%	3.97%	3.83%	1.41%	1.92%
Marion	19.32%	15.90%	13.09%	11.36%	10.30%

Source: [2022 and 2020 HUD Fair Market Rents \(40% Percentile Rents\)](#)¹⁰⁶

This waiver and alternative requirement will provide the State with additional time to stabilize persons or households in permanent housing and is consistent with the goal of preventing homelessness of residents in impacted areas. The damages from the wildfires diminished the opportunities for homeless, at-risk persons, and LMI households living in impacted communities to independently establish affordable housing. The goal of this

¹⁰⁶ 2022 and 2020 HUD FMR (40th Percentile Rents), https://www.huduser.gov/portal/datasets/fmr.html#2022_query

waiver and alternative requirement is to prevent homelessness and provide additional time to stabilize persons or households in permanent housing while the State works to replace the housing stock lost from the wildfires.

Reference of comparative rents by county, from 2020 to 2022:

	2020 HUD FMR (40%)				
County	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Clackamas	\$1,192	\$1,289	\$1,495	\$2,157	\$2,625
Douglas	\$699	\$815	\$1,073	\$1,548	\$1,824
Jackson	\$729	\$792	\$1,043	\$1,505	\$1,831
Klamath	\$566	\$648	\$852	\$1,201	\$1,331
Lane	\$773	\$893	\$1,176	\$1,696	\$1,989
Lincoln	\$659	\$812	\$1,012	\$1,460	\$1,767
Linn	\$721	\$832	\$1,096	\$1,562	\$1,824
Marion	\$709	\$761	\$1,001	\$1,444	\$1,757

	2022 HUD FMR (40%)				
County	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Clackamas	\$1,416	\$1,512	\$1,735	\$2,451	\$2,903
Douglas	\$765	\$876	\$1,152	\$1,636	\$1,816
Jackson	\$825	\$908	\$1,195	\$1,697	\$2,045
Klamath	\$606	\$693	\$912	\$1,295	\$1,552
Lane	\$833	\$958	\$1,254	\$1,781	\$2,146
Lincoln	\$732	\$877	\$1,102	\$1,556	\$1,886
Linn	\$808	\$865	\$1,138	\$1,584	\$1,859
Marion	\$846	\$882	\$1,132	\$1,608	\$1,938

7.2.4 Request for exception from DOL on the interpretation of the applicability of the Davis-Bacon and Related Acts, Section 3, and Section 504 to Ongoing or Pre-Award Non-Residential and Non-Commercial Construction Work

DBRA is made applicable to the Community Development Block Grant program by Section 110 of the Housing and Community Development Act of 1974 (HCDA), now codified at 42 USC 5310. Also, under the regulations of the U.S. Department of Labor (DOL) at 29 CFR §1.6(g), where federal assistance is not approved prior to contract award (or the beginning of construction if there is no contract award), Davis-Bacon wage rates apply retroactively to the beginning of construction and must be incorporated retroactively in the contract specifications.

OHCS requests HUD to ask DOL to allow an alternative interpretation of DBRA for work previously completed and work currently in progress which OHCS would like to fund with OHCS's 2020 CDBG-DR grant. There is precedent for granting this request and it is particularly helpful when CDBG-DR funds are used to match FEMA PA projects or help supplement unmet infrastructure projects that must be completed early in the recovery to enable additional housing and community recovery that can be funded by CDBG-DR programs. The Sandy grantees from 2011-2012 and the 2015-2019 CDBG-DR grant recipients had special permission from DOL on the applicability date of DBRA to CDBG-DR funded projects. In addition, this provision reduces recovery delays and administrative costs for impacted communities, as it removes the need to add costly and time-consuming administrative layers to completed or ongoing projects. The potential for requesting this alternative interpretation is also outlined in HUD-FEMA's joint [Implementation Guidance for Use of Community Development Block Grant Disaster Recovery Funds as Non-Federal Cost Share for the Public Assistance Program](#) (page 40).

Specifically, OHCS is requesting that DBRA prevailing wage requirements not be applied retroactively to construction funded in whole or in part with 2020 CDBG-DR funds for:

- Construction work completed prior to the OHCS and HUD CDBG-DR agreement when CDBG-DR grant funds reimburse already incurred project costs.
- Construction work in progress when that work starts prior to the OHCS and HUD CDBG-DR agreement.

The State seeks a similar alternative requirement and interpretation from HUD for the applicability of compliance with Section 3 and Section 504 under these circumstances.

7.2.5 Section 104(d) One-for-One Replacement of Lower Income Dwelling Units

OHCS is adopting the waiver provided through Section IV.F.1 of the Consolidated Notice. For the purpose of complying with this alternative requirement, OHCS is defining a property as “not suitable for rehabilitation” if any of these conditions apply:

- The property is declared to be a total loss.
- Repairs would exceed 50% of the cost of reconstruction.
- Homes cannot be rehabilitated or reconstructed in place under existing agency policies and award caps due to legal, engineering, or environmental constraints, such as permitting, extraordinary site conditions, or historic preservation.

7.3 Summary and Response to Public Comments for Amendment #2

7.3.1 Summary of Public Comments

The following provides a summary of the key themes that were raised in the October 2024 public comment period, county and partner briefings, and public hearing sessions.

- **Housing Support Services Program Recommendations:** Support for ReOregon’s investment into the proposed programming to help renters and tenants.
 - **Renter/Tenant Support:** Interest in the proposed options for renters and tenants who are still facing difficulties with recovery. Comments identify the unique challenges of this population.
- **AHD Program Recommendations:** Recommendations based on community resources and available data, current potential applicant challenges, and known experiences of survivors. Requests for engagement requirements with local organizations and representatives on the ground.
- **HARP Program Recommendations:** Comments identify the ongoing challenges for homeowners seeking participation in HARP and concerns regarding homeowner managed projects.
 - **Reimbursement Pathway:** Interest in the proposed pathway, with questions seeking clarification of the program design. Comments include examples of interested applicants and their challenges.

- **Ineligible Applicants:** Comments from applicants describing their concerns with their ineligible determination and requesting any potential recovery pathways proposed within the Amendment.
- **Multiplex/Multifamily Units:** Comments seeking clarification on eligible structures and any potential recovery pathways proposed within the Amendment.
- **Housing Recovery Services Program Recommendations:** Requests to keep the disaster case managers funded through this program's resources.
- **Planning Program Recommendations:** Requests to review rental control measures to support long-term recovery, update building and zoning codes to support resilience to fires, and provide other legislative support.
- **Bureaucracy/Slow Pace of Delivery:** Concerns and complaints regarding recovery timeline and pace of delivery. Questions regarding the implementation timelines for the proposed amendments.
- **Outreach Efforts:** Requests for key efforts for marginalized farm workers. Questions regarding HARP outreach and intake partners. Questions regarding public monitoring of program progress.
- **Program Allocations:** Requests for dedicated funds to support senior survivors. Clarification on the PIER program and its allocations. Concerns regarding the reallocation of housing program funds, notably away from HARP to Housing Support Services. Requests to outline program allocations for counties.
- **County Management:** Requests to provide local county control of programs and allocation management.

The input received during the above referenced briefings and meetings has informed OHCS's recovery plan, including decisions related to funding allocations and program design. OHCS will continue to affirmatively outreach to all tribes and vulnerable populations for future public meetings and consultations.

7.3.2 Public Comments and Responses

7.3.2.1 Housing Support Services Program Recommendations (including Renter/Tenant Support)

1. **Public Comment:** What if you aren't a homeowner? I was living with my mom due to late husband and his cancer.

a. **Response:** Thank you for sharing your interest in better understanding the programs that will be available to serve non-homeowner households impacted by the fires. Fire-impacted individuals and households who were renters, tenants, or nontraditional homeowners (such as those who owned RVs) may be eligible to receive ReOregon assistance through the Housing Support Services program, which includes multiple pathways for housing recovery. Those pathways are Intermediate Housing Assistance, which will provide temporary rental assistance to eligible households, Down Payment Assistance for eligible first-time homebuyers, and Housing Counseling Services to assist households with homebuyer's education, financial coaching, and credit counseling to help achieve their housing recovery goals. Housing Support Services will begin serving eligible impacted households in 2025. Additionally, housing units for affordable homeownership and/or rental that are created within each county through the Affordable Housing Development program may also provide more housing opportunities for fire-impacted households in the future.

2. **Public Comment:** I'd be interested to seeing more housing built in the area. We were renting during the HFF and are still renting a crummy below par house. We've been looking for other housing in the area with no luck. We've also entertained the idea of building in the area, however, the lot prices are quite high and continuing to rise. I'd like to see some of those funds dedicated to renters and folks looking for housing in the McKenzie River Valley. Additionally, I'd like you to consider setting up a building trust that could be used to develop housing in the area. The trust could provide low interest lending to facilitate the building of decent housing in the area allowing folks to either build a home for themselves or provide some easier access to additional rental housing in the area. Seems it could be set up to allow for several homes to be built and then continue to be available for homes in the future. I think it's safe to assume that the need for housing in the future in this area will continue to be great. We have a very limited supply. It seems the short-term rental properties are more in abundance than something designed for long term. Additionally, I have concerns about the quality of the manufactured products that are being put in the area. I would certainly like to see high quality housing built for the long term in the area to help support the folks that live in the McKenzie River Valley. Thanks for your time.

b. **Response:** The Affordable Housing Development program will provide funding to a recipient in each county to design an affordable housing program to meet the needs of their fire-impacted residents; this could include new units for affordable homeownership and/or rental and could be any type of housing, from single-family homes to new manufactured homes to new construction

multifamily rentals. Additionally, all housing constructed with Affordable Housing Development program funding will have a mandatory affordability period, meaning those homes/units (whether for rental or homeownership) all must remain affordable to low-to-moderate income households for a set period of time. We encourage you to continue using your voice to make sure your experience and those of others like you are represented in those important community conversations as a plan is made for the Lane County Affordable Housing Development program funding.

3. **Public Comment:** I was a renter in one of mobile home parks. I managed to get one bill in my name while I was there [inaudible] every time I applied to anything. And then when I look at stuff, I'm like, "Is any of this for renters? Like other than housing counseling?" Like I'm on a fixed income. I'm on disability. I'm almost 60, and I still live in a Tuff Shed in the back of someone's house without [inaudible] because she won't go on record that I've been living there. I still have to pay rent every month. So, there's like rental assistance.

c. **Response:** Thank you for sharing your interest in better understanding the programs that will be available to serve non-homeowner households impacted by the fires. Fire-impacted individuals and households who were renters, tenants, or nontraditional homeowners (such as those who owned RVs) may be eligible to receive ReOregon assistance through the Housing Support Services program, which includes multiple pathways for housing recovery. Those pathways are Intermediate Housing Assistance, which will provide temporary rental assistance to eligible households for up to 24 months, Down Payment Assistance for eligible first-time homebuyers, and Housing Counseling to assist households with homebuyer's education, financial coaching, and credit counseling to help achieve their housing recovery goals. Housing Support Services will begin serving eligible impacted households in 2025. Additionally, housing units for affordable homeownership and/or rental that are created within each county through the Affordable Housing Development program may also provide more housing opportunities for fire-impacted households in the future.

4. **Public Comment:** I was a renter, I was on the lease for a time. I have really low income. I wrote this — I'm a proud owner, own my own business [inaudible], which I started after the fire. I'm still living transition. I'm not good at public speaking. I thought I had it going on when I was at the house there, and they're obviously not going to be rebuilding. And like I said, I'm low income. I don't think I really qualify for much. You know, I really don't. I mean, I'm just learning how to get on my feet on my own plus with my own emotional problems — challenges — because it does step in

a lot. So, it's hard for me. I'm just wondering how — like these programs are not — what are we going to do? I mean, I had shared housing. We had three-bedroom housing, you know? And now, I don't know what I'm supposed to do. I'm doing everything I'm supposed to be doing and I'm trying to interact with the community. I'm trying to work on my business. I'm doing whatever I can, but I am so afraid that I'm going to lose the place I'm living. I'm grateful for the roof over my head, you know. It's transitional and there's been a lot of changes there. I've been in the same place for last four years. So, a lot has happened. And the transition's good for the community, but at this point I need to move on, and I don't know how and where and what's going to happen to me — and it's not just me. It's a little 7-pound chihuahua who comes with me everywhere. He would be here today, but I actually found a babysitter for him. Recently he almost got stolen straight out of my apartment. There's more of us that are there that are being mixed in with other people from the street, which for me I had a home. I worked hard to get the home just to feel like I'm not — I keep working up, but it doesn't feel like it's ever going to be good enough for anybody, even though I'm trying really, really hard, and I feel like I am getting left out. I've been trying to get back here in these programs and stuff, but what's going to happen to me? You know, I'm not making enough. That's all I've got to say.

d. **Response:** Thank you for sharing your experience. Fire-impacted individuals and households who were renters, tenants, or nontraditional homeowners (such as those who owned RVs) may be eligible to receive ReOregon assistance through the Housing Support Services program, which includes multiple pathways for housing recovery. Those pathways are Intermediate Housing Assistance, which will provide temporary rental assistance to eligible households for up to 24 months, Down Payment Assistance for eligible first-time homebuyers, and Housing Counseling to assist households with homebuyer's education, financial coaching, and credit counseling to help achieve their housing recovery goals. Housing Support Services will begin serving eligible impacted households in 2025. Additionally, housing units for affordable homeownership and/or rental that are created within each county through the Affordable Housing Development program may also provide more housing opportunities for fire-impacted households in the future.

5. **Public Comment:** Do you help people who don't have a wood home that burned down? I'm a former fire fighter until a tree fell on me and messed up my brain and my spine. I live in a RV that is 35 years old. Since after the fire, we have not had hot water, decent wiring for electricity ... We don't want a home because of my PTSD. I get \$963 a month after working 45 years. My rent is \$775. I couldn't even afford my

medicine. And I came here to see if there's help for people like us. Like everybody that had a house that burned down, I'm very sorry. Ours was damaged. We can still smell the smoke through the walls. And she's got asthma and COPD.

a. Response: Thank you for sharing your experience. Fire-impacted individuals and households who were renters, tenants, or nontraditional homeowners such as those who owned RVs may be eligible to receive ReOregon assistance through the Housing Support Services program, which includes multiple pathways for housing recovery. Those pathways are Intermediate Housing Assistance which will provide temporary rental assistance to eligible households for up to 24 months, Down Payment Assistance for eligible first-time homebuyers, and Housing Counseling to assist households with homebuyer's education, financial coaching, and credit counseling to help achieve their housing recovery goals. Housing Support Services will begin serving eligible impacted households in 2025. Additionally, housing units for affordable rental and/or homeownership that are created within each county through the Affordable Housing Development program may also provide more housing opportunities for fire-impacted households in the future. Within HARP, we will take your feedback on smoke-impacted homeowners and review program policies and processes to determine a pathway for this population.

6. **Public Comment:** *(Translated to English) Hello. My apartment in Talent burned down, and a month later, they gave me an apartment just like the one I had, but because of the rush it gave me a lot of problems. Then they started talking about how there were millions of dollars to help. If you lived there, you wouldn't make it. The water in the bathroom was overflowing. The help is for the owners of the house, always for them. So where is the help? If what happened to me had happened to you, you wouldn't make it.*

a. Response: Thank you for sharing your experience. Fire-impacted individuals and households who were renters, tenants, or nontraditional homeowners (such as those who owned RVs) may be eligible to receive ReOregon assistance through the Housing Support Services program, which includes multiple pathways for housing recovery. Those pathways are Intermediate Housing Assistance, which will provide temporary rental assistance to eligible households for up to 24 months, Down Payment Assistance for eligible first-time homebuyers, and Housing Counseling to assist households with homebuyer's education, financial coaching, and credit counseling to help achieve their housing recovery goals. Housing Support Services will begin serving eligible impacted households in 2025. Additionally, housing units for affordable homeownership and/or rental that are created within each county through the Affordable Housing

Development program may also provide more housing opportunities for fire-impacted households in the future.

7.3.2.2 AHD Program Recommendations

7. Public Comment: *Make sure you can use AHD \$ for preservation of existing affordable housing (i.e., projects/units that are coming to the end of their covenant/affordability restrictions). For new homeowners program, don't write the regs that they have to be prior renters, just residents of the county (so you potentially can serve folks who lost RVs or similar nontraditional living arrangements).*

a. Response: Thank you for voicing the needs you see in your community. The Action Plan Amendment adds eligible activities under the Affordable Housing Development program, including the acquisition and/or rehabilitation of existing housing units for affordable homeownership or rental. This gives each impacted county subrecipient the opportunity to design a program that fits the needs of their community, using feedback received from residents and housing advocates. Housing developers who receive funding to develop affordable homeownership opportunities with AHD funding will create a homebuyer selection plan that will outline eligibility. The Action Plan Amendment also provides flexibility in determining eligibility of fire-impacted households for Down Payment Assistance provided as a pathway of the Housing Support Services program and includes eligibility for households who were nontraditional homeowners (such as RV owners) at the time of the fire or are currently.

8. Public Comment: *I am a disabled fire survivor who lost my affordable housing and experienced extended displacement and homelessness as a result of the 2020 Alameda wildfire. Pre-fire I was enrolled in the ACCESS homeownership program. This is to address the gap between what's offered as "affordable" housing and what's truly affordable for low-income and fixed-income fire survivors. FIRE LOSS: Homeownership, especially post-fire, remains a struggle. I lost my (privately paid) long-time affordable rental, and after a three-year post-fire displacement and recovery; I now rely on a HUD rental voucher. STEPS TAKEN: Let me share some steps taken in 2020–2024 towards homeownership: My disability income is below \$1,000 a month, so I recently added PT income. Applied for the voucher rental program in 2018 and attained a rental in 2022. Completed all steps to the Voucher to Home Mortgage program. Enrolled as a participant in the Family Self-Sufficiency program. Applied for/completed steps USDA Rural Loan (halted for lack of funding). Completing USDA loan education via my proactive USDA-educated realtor! Applied for Dream savers (IDA) 2022 \$9,500 downpayment met. Qualify for \$60,000 first-time homebuyer grant and \$2000+ RVAR/OAR. I have a credit score of 800+, and no*

outstanding debt. **NEW SPIRIT VILLAGE:** I am near #1 on the wait list for New Spirit Village. The mortgage for the smallest home is over \$1,400, which does not include an additional \$400–\$600/month cost of utilities/reasonable upkeep. Even with a land trust and low HOA, \$1,800/month–\$2,000/month isn't affordable! Using the HAJC rental-to-home mortgage voucher for my mortgage payment limits me to \$1000–1100/month maximum payment. **AFFORDABILITY GAP/COSTS:** New Spirit Village has been (publicly) slated for low-income survivors to help us recover from fire-related home (owner or rental) loss. The Thaldens referenced wanting to assist survivors who camped in their cars, tents, and hotels, which I did. Despite all my contributions, a huge affordability gap remains. **DENIED FINANCING:** 3 ACCESS Recommended lenders refused to prequalify me for any amount, due to my low income, which was embarrassing, time-consuming, and a huge barrier. Despite all efforts, I cannot meet the requirements to buy an NSV unit. **RENTAL/FAMILY RESTRICTION:** The HAJC home voucher program, and USDA won't allow rent of any part of a property. There are restrictions regarding adding family members, adult children, or college students. This potentially leaves (older disabled) owners living alone with less support and reduced income options. **SSI ASSET LIMITS:** SSI restricts my savings to \$2,000 maximum. This doesn't cover the cost of an average US household, car, medical, or weather emergency in 2024 and creates additional financial risk. The expectation that I maintain a house — an asset worth hundreds of thousands — in 2024 while being prevented from having adequate savings (or penalized) for doing so is unreasonable and amounts to financial treachery. See the SSI Savings Act. **SOME PROPOSED SOLUTIONS:** Decrease the GAP. More first time grants and recipients plus larger IDAs & bigger matches. Develop smaller, more efficient, quality, healthy builds, and add more land trusts. Allow flexible rules for family members, adult children, students. Allow some rental income options. Support in-progress projects (Breath of Life) to successful completion. Support increased asset limits so individuals can save \$10,000 or \$20,000. Increase help with telecommunication and technology costs, which can exceed \$120/month but are crucial for effectiveness in the workplace and school. Lastly, reexamine the term “affordability” for fixed income/elderly, disabled people. **CONCLUSION:** I've worked tirelessly to improve my situation, please consider how you can help me (and other survivors) achieve our long-term homeownership goals. Thank you for inviting me to share my concerns.

a. Response: Thank you for sharing your experience. It is incredibly valuable to hear from fire-impacted households like yourself as we are designing programs to help you achieve your housing recovery goals. The Down Payment Assistance pathway of the Housing Support Services program that will be launching in 2025 will provide up to \$150,000 or 70% of the sales price for down payment and closing cost assistance to eligible low-to-moderate income fire-impacted households. Additionally, the Affordable Housing Development program will

provide funding to a recipient in each county to design an affordable housing program to meet the needs of their fire-impacted residents; this could include new units for affordable homeownership and placing the units in a land trust is an eligible option. We encourage you to continue using your voice to make sure your experience and those of others like you are represented in those important community conversations as a plan is made for the Jackson County Affordable Housing Development program funding.

- 9. Public Comment:** *Thank you for the opportunity. So, the Echo Mountain complex destroyed 288 homes, and it placed 15,000 individuals under evacuation notice. There are still approximately 40 households without permanent safe housing. That is really over 100 individuals. Because what we're finding is there were some cohabitation situations. And currently, in my caseload, Wildfire Recovery Navigator with Lincoln County, there are 29 households, 63 individuals, 29 pets, and 50 livestock. I do mention livestock because that's a huge barrier to permanent safe housing in terms of rental whereas it's temporary housing as well for people who are rebuilding. And we know that data-driven efforts help shape policies and practices. So here are some numbers for you. From the 29 households, only 10 of the 29 households are homeowners, 66% of my caseload are renters and three-fourths of survivors are either seniors or vulnerable adults, adults living with disabilities. Forty-seven percent have left Otis but are still in Lincoln County, living with family and friends, sometimes over-occupancy situations that puts the head of household at risk for losing their housing. Eighteen percent have left Lincoln County due to a lack of housing or community support. Some have even left the state. And luckily, we're in contact with some of them to try to navigate services to get them back into their own place. And although 35% still remain in Otis, what we're seeing is that they're living on their property in non-permanent dwellings, RVs that are not livable, sometimes even on their friends' or family's properties, or in a Tuff Shed they have built on their property. And the barriers to temporary housing, such as permanent housing, are huge. I document my way to the due diligence that I provide to that three-to-four-year span that they're going to wait to rebuild to get them into safe permanent housing, a warm place this winter. But the livestock, their pets, other conditions, such as not having rental history or poor credit, that keeps them from that rental space. So, some of the barriers, and I will start with some folks. And I will keep this at three minutes. "I inherited this property. Until now, I've never had to worry about steady income or establishing credit. Even low-income rent is more expensive than what I was paying in rural Otis because most of the housing developments are in Lincoln City or Newport." "I own the land. And I was not yet a homeowner but my brand new RV was destroyed." "I didn't own the land, but I was paying the property taxes." So, what we're finding, too, is that due to a lack of financial literacy and socioeconomic status and all these little other environmental factors, people were coerced into living conditions pre-fire that were really*

unfair and set them up to not qualify for recovery funds. So other things to consider in terms of barriers, no taxable income to qualify for a home or an apartment. Many of the people who inherited the homes, they were selling produce that they grow. Or they were artists. They were selling the carvings that they did from the trees. Criminal histories, they didn't have to worry about that when they resided in a home. And now rental, they screen up for that. The digital divide and not having access to technology or sometimes even support to help get that application in motion for them. And legal documentations that are required and that they've lost in the fire, just knowing that it takes a while to get those forms back. So, some solutions, and I thank you for the SAPA, that brings a lot of hope. When you think about the affordable housing development and allowing opportunities for both home ownership and then rental development, please consider nontaxable, nontraditional income when allowing opportunities for both first-time homeowners and renters. Please consider support with creating a credit profile for folks who don't have credit or poor credit. Consider domestic violence situations when financial abuse led to a loss of resources or poor credit due to monetary coercion. We're seeing a lot of that. Some unique issues around divorces and coercing, they were homeowners and then the head of the household, the abuser, somehow took them off the house note and now they're homeless. And consider allowing pets, not just service animals and emotional support animals. Allowing pets into these rental structures that you create. And also consider nontraditional household compositions like chosen families for LGBT households. And then also, I just spoke to a family today. She was a homeowner. She's in the rebuilding process and she's retired, a former business owner. And then during that transition post-fire, drug addiction affected her family and she's now raising her grandchildren. So that family composition has changed. She doesn't have legal custody, but she has physical custody, so considering those nontraditional household compositions within rental eligibility standards. And adding reimbursements as a recovery pathway. Yes, thank you, thank you, thank you. Some considerations as part of the rebuilding process for folks, there are still questions about the stop work order process. So, thinking about, many survivors have questions, and will they need to fire their existing contractors? They need to know this because some of them have already began that rebuilding process. You know, they didn't want to wait, and we got creative around rebuilding resources. Can they keep their existing work team to ensure continuity and the lack of disruption when they do get the HARP work stop order? So, things to think about. And so, yeah, wildfire survivors are still waiting for recovery opportunities. And we trust that you will do your best to deliver. Thank you.

a. Response: Thank you for sharing what you are seeing on the ground in Lincoln County as you support fire-impacted households in their housing recovery. We have made note of your comments and will keep them in mind as we finalize policies for the Housing Support Services and Affordable Housing Development

programs. We also encourage you to continue using your voice to share the needs and challenges you are hearing from impacted households as your county works to design your Affordable Housing Development program using the Lincoln County allocation. Regarding HARP, thanks for sharing your support for the Reimbursement pathway proposed in this Action Plan. We are still designing the policies for this pathway, and your feedback is invaluable. The Action Plan proposes a maximum potential award is \$100,000, based on review of documented eligible home recovery expenses that meet program standards. Currently, per the HUD Federal Register, only costs that were incurred before Feb. 3, 2023, are eligible, however, OHCS is pursuing a waiver for this limit. At this time, we anticipate the policy will require an inspection to be conducted to determine the Work in Place to understand the work conducted to date. All applicants are required to stop any repair, reconstruction, or replacement activities they are conducting on their damaged property upon Application submission. When the stop work is issued, the notice must be followed until the environmental review process is completed. The federally required environmental review is the process of reviewing a project and its potential environmental impact to determine whether it meets federal, state, and local environmental standards. Once you indicate you are planning to use federal funds for a project, you can't take any choice-limiting actions. Regular maintenance activities may be allowed to continue even if a stop work notice has been provided. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

7.3.2.3 HARP Program Recommendations (including the Reimbursement pathway)

10. Public Comment: *Work with Energy Trust of Oregon, Oregon Department of Energy to get heat pump repairs, solar, etc. ODE should have a list of participating contractors that can repair at a discounted rate.*

a. Response: Thank you for your suggestion. ReOregon has been in contact with the Oregon Department of Energy regarding programs available to homeowners. Our approach is to use contractors that manage the entire recovery process, rather than bidding on individual elements piecemeal. This ensures a more streamlined and efficient process for homeowners.

11. Public Comment: *Our home was damaged, and we had to repair the burns on the house. However, we have requested help to continue with the repairs or replacements. Honestly, I feel that it is unhealthy to continue living in a place that has been damaged. I would like to know if there is any hope for my family and me in having my application*

reviewed in HARP. I understand that there are many steps to follow, but I feel that this process is taking too long, and the numerous requirements are generating a lot of stress and frustration. Thank you!

a. Response: Thank you for sharing your concerns and experience. We empathize with your frustration caused by the slow pace of delivery and agree that award delivery has not moved as quickly as any would have liked. Housing recovery is indeed a critical issue, and we are committed to addressing it with the utmost urgency. We acknowledge that the process can be long and time-consuming. Our goal is to streamline the procedures and provide more efficient assistance, within the terms of the grant that require OHCS to follow specific rules, regulations, and document each detail along the way. Federal funds are designed with rules and requirements that are rooted in historical learnings that spur from unfortunate circumstances of fraud, waste, and abuse of public funds. It's our goal to ensure the necessary funds reach folks who need them most, however, to do this, evidential documentation must be collected. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. We encourage you to continue working with Access or Unete and with your ReOregon Case Lead for further support. We appreciate your input as we continue to improve our programs to better serve all members of our community.

12. Public Comment: (Translated to English) *My way of thinking is that not everyone is helped equally, there are still many homeless people. At least I bought something quickly with the money that FEMA gave us, but unfortunately, I had to sell my trailer this year because I was going through a situation of domestic violence, and I was left with a lot of stress and depression due to so much debt that my husband gave me, and I paid a little with that sale. But I saw myself obliged to rent something to live on. And then I also have my daughter who arrived through asylum with her family and now I need something stable for myself since I am a little older (52 years old).*

a. Response: Thank you for sharing your experience. We understand your case is unique and requires further discussion to support you. As current HARP program policies are written, we understand your ineligibility can be frustrating. ReOregon does fund other programs such as Housing Recovery Services, highlighted in this Action Plan, that can connect you with a Disaster Case Manager or Housing Navigator to support you on your journey. We encourage you to continue working with our community partners in Jackson. We appreciate

your input as we continue to improve our programs to better serve all members of our community.

13. Public Comment: *I think a reimbursement program would be a great addition to the HARP program. It would help those that have already rebuilt their homes but struggled during that time to come up with the lump sum to cover initial costs. I know for our loan through the SBA, we had to cover \$25,000 in costs before we could start receiving funds for rebuilding. I also agree with removing the income limits for the program. I believe there were a lot of folks that may have been just above the limit that needed to find ways to rebuild without the assistance of your program. This put a hardship and placed barriers on many citizens who, at the time, were going through one of the most traumatic times in their lives.*

a. Response: Thank you for sharing your support for the HARP Reimbursement pathway proposed in this Action Plan Amendment. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

14. Public Comment: *FEMA didn't help us because we had insurance. So, we were homeless like everybody else, lost everything like everybody else, but FEMA gives us 500 bucks and said, "Sorry, you have \$11,000 in additional living expenses." You know how fast that went? A thousand dollars a month easy with hotels and everything. So, anyway. So, we had insurance, right? I put every penny I had including my \$20,000 in savings and the insurance and put it down on a downpayment on a house ... So, that was the only way that we were going to be able to make it. You know, we're on an income. Everybody's on a fixed income. So, we got in way over our head with the mortgage, insurance. We have all the utilities now. We had a space rented, a land line, and electricity [inaudible]. And that's quadruple the cost, but your income stayed the same. So, that kind of blew it as far as no way we're going to be able to rent ... I'm here because I'm looking for reimbursement. Like a lot of other people, maybe even people in this room, we got screwed royally by people selling off their junk property and selling problems to us. They*

had shoved a whole bunch of insulation up underneath the shower. So, you couldn't, you know. They tried to keep it at bay for two years because that's the statute of limitations. We had two years to sue the hell out of that woman, and she did what she did there, and she was a property manager. I could have took her license. She wouldn't have no business, nothing. But there was nobody to help. And I didn't have \$250 to talk to an attorney for five minutes. I just didn't have that kind of money to throw out. I just didn't. So, we got screwed. You know, I could have owned my home outright. I wouldn't even be here. There was no way to help. So, I'm looking into the reimbursement. I feel that I have probably a half million between the money we put down on the new home and all the repairs that we've done. My heat pump is 2011. If I don't get that placed, we could have no heat and no nothing for winter. So, that's why I'm here. I'm very upset about her being in charge of this. You smile because I'm going to tell you something right now. I have an elderly mother and there was a bedbug issue, okay? She's mentally ill. So, I tried everything. I went to the Housing Authority. I filed a complaint. I got trespassed. I haven't seen my mother since July 31st because they won't let me on the property because I reported. And no matter what you do, you go to HUD, you go to Housing Authority, you go to the Elder Abuse Line, you go to all these elder neglect, everywhere, everywhere you go, it's just a loop. And it goes right back to the Housing Authority and Jackson County Mental Health. So, my mother is sitting. But I'm still trespassed from the property from the Housing Authority to see my mother. I had to spend my 62nd birthday without my mother. So, for the Housing Authority to be in charge of this, I'm upset about that. It's not good. Housing Authority won't give me the time of day. None of us would be in this room right now. Instead of wasting hundreds of millions dollars on one of those where I used to live. So, I'm sorry. I'm upset. Tired of hearing, "No, waiting list. Sorry, your phone is blocked. No, waiting list. Oh, nope. This is gone." I mean, I'm just done. And mental health, mental health sucks too. So, I'm done looking for another counselor. So, my mental health isn't good. And if I don't get some help, I'm screwed. My heat pump is going to go out. I'm not going to have any heat this winter. There's other things going on. The pipes need insulation up in the attic. I got claustrophobic up there. Trying to put the insulation on the pipe, I had to run back out [inaudible]. I need help. So, I hope that's there. Thanks.

a. Response: Thank you for sharing your concerns and experience. We empathize with your frustration caused by the slow pace of delivery. We acknowledge that the process can be long and time-consuming yet encourage you to complete your HARP application. Our goal is to streamline the procedures and provide more efficient assistance, within the terms of the grant that require OHCS to follow specific rules, regulations, and document each detail along the way. Federal funds are designed with rules and requirements that are rooted in historical learnings that spur from unfortunate circumstances of fraud, waste,

and abuse of public funds. It's our goal to ensure the necessary funds reach folks who need them most, however, to do this, evidential documentation must be collected. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. We encourage you to continue working with Firebrand and your intake specialist for further support. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

15. Public Comment: *Applicant wants some type of credit for people that have spent their own money to live in any place after the fires in 2020 until their house was rebuilt. Applicant is talking about considerable compensation for homeowners. Applicant would like to be awarded for additional mitigation cost in rebuilding a home.*

a. Response: Thank you for sharing your interest in the HARP Reimbursement pathway proposed in this Action Plan Amendment. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

16. Public Comment: *I feel it IMPERATIVE and crucial to include and authorize reimbursement to fire survivors for homes rebuilt. It is just not fair to people who lost what they had to be worse off financially due to the unprecedented inflated costs to build including the daunting permitting processes and higher interest rates causing especially elderly to incur MASSIVE costs for loans when relief is but a decision from you away. Please consider reinstating reimbursement for those in need of relief.*

a. Response: Thank you for sharing your support for the HARP Reimbursement pathway proposed in this Action Plan Amendment. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you

rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

17. Public Comment: *I lost everything, including my house, in the 2020 Holiday Farm Fire. I would like there to be funding for reimbursing those of us who had to purchase a replacement house so that we could have a place to live. Thank you.*

a. Thank you for sharing your interest in the HARP Reimbursement pathway proposed in this Action Plan Amendment. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

18. Public Comment: (Translated to English) *Why don't they lend us the money to pay our debt because the payment and interest are so high. Almost three times higher than before the fires, and they always tell us that we don't qualify for one reason or another. If you have resources, then lend us the money and we pay it back until the loan is paid off.*

a. Response: Thank you for sharing your experience. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal

funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

19. Public Comment: (Translated to English) *Well, we have many questions about solutions for those of us who lost our homes or who own trailers or houses. And those of us who have been included are a big difference, but at the same time we are now in the same conditions because there is no answer to the questions, both for those who own the house or those who rent, so we have not been the same again because we do not have our apartment or our house. We are not emotionally and economically stable. So, where are we now? There are still many outside our area. So, those are the questions, where is this aid and how can I qualify for this aid?*

a. Response: Thank you for sharing your experience and concerns. We empathize with your frustration caused by the slow pace of delivery and agree that award delivery has not moved as quickly as any would have liked. Housing recovery is indeed a critical issue, and we are committed to addressing it with the utmost urgency. This Action Plan Amendment proposes new award maximums for HARP to assure award amounts are calibrated correctly to the needs on the ground, it proposes a reimbursement pathway for homeowners who have already recovered and depleted personal funds or taken on loans. The Amendment also includes a redesign of additional housing programs to provide further options for renters and tenants through the Affordable Housing Program and the Housing Support Services Program. We are continuously working to improve our systems and ensure that all applicants are heard and treated fairly, without discrimination.

20. Public Comment: *Okay. So, what I'm hearing is there's very narrow and limited uses or reasoning eligibility behind that reimbursement category. And I say that because I want to have clear expectations that many of the participants we work with that are coming are looking for reimbursement for things like, "I had to drain my \$20,000 savings. I had to clear out my — I had to use all my retirement. I had to" — you know. So, just to be able to survive, right? So, it sounds like that type of reimbursement is not what we're talking about. It's all housing related. That's it. So, if I had to drain my savings and buy [inaudible] or buy a hotel room, those are not necessarily reimbursable expenses. It all has to do with the development of reconstruction having to rebuild your home. That is what I want to make sure is very clear because when you talk reimbursement and use that term, the majority of the people affected are looking to recapture assets they had to*

use, their entire life savings, for example, and that's not going to happen. Whatever resources they had to use, it's a very narrow definition for how reimbursement can be used — it's not going to give you back your \$20,000.

a. Response: Thank you for sharing your interest in the HARP Reimbursement pathway proposed in this Action Plan Amendment. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help homeowners recover the repair and replacement costs. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible home recovery expenses that meet program standards. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

21. Public Comment: *And I used to live around here when the fires happened. They were in Medford Estates, and it's been rough the last three years. We've just moved from one housing to another trying to find something. We tried to find a condominium that we were able to purchase. It needed a lot of renovations to it. We were able to do some of it. We applied to your program to get reimbursed for a bathroom remodel of our home, and we received a letter from you stating that it wouldn't proceed. So, we would like to know what exactly is this new thing that you're proposing. That's it.*

a. Response: Thank you for sharing your experience. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. Additionally, based on applicant experiences like yours, the Action Plan Amendment also includes multifamily or multiunit structures (structures of five or more connected units) as eligible structures for a reimbursement award. Although you may have been

ineligible for a repair or reconstruction award due to your structure type, the program will evaluate your eligibility for reimbursement and will be in touch with you. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

22. Public Comment: *I do not agree with your decision to disqualify me. Your reasoning is insufficient because what I am requesting within the unit is necessary, not a luxury. This need exists within the unit and does not affect anyone else. **(Translated to English)** Right now, what they put on the screen in the session that said housing payment services or help with down payment, they mentioned the colors. I put in each of the requirements to prove that I had been affected. They canceled me for having a condominium, now on their screen it is mentioning condominium. Now there is a change. It says that the condominiums will qualify for the refund and who assures me that they are not going to make my trauma grow more, they are making me go around and around to bring the documentation, and they are going to put any other black point where they said for some reason you did not qualify again. Do you realize that they are returning the trauma to us? Now they mention there 30 million for one apartment and 5 million for another apartment and 3.5 for other apartments? To me it gives the amount of 39 million and on social networks they are mentioning 220 million. So, how can I take a guarantee or a sign that I was affected? The fire was not racist, it burned us equally. Why, to qualify there is so much difference?*

a. Response: Thank you for sharing your experience. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. Additionally, based on applicant experiences like yours, the Action Plan Amendment also includes multifamily or multiunit structures (structures of five or more connected units) as eligible structures for a reimbursement award. Although you may have been ineligible for a repair or reconstruction award due to your structure type, the program will evaluate your eligibility for reimbursement and will be in touch with you. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

23. Public Comment: (Translated to English) *Does your policy say that there is help only for duplexes? I have a condominium and if you can help us to finish the construction. If you could help us that would be my request, thank you very much.*

a. Response: Thank you for sharing your experience. Currently, the Homeowner Assistance and Reconstruction Program (HARP) does not have multifamily or multiunit structures (structures of five or more connected units) as eligible structures for repair or reconstruction. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the HARP, as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. Additionally, based on applicant experiences like yours, the Action Plan Amendment also includes multifamily or multiunit structures (structures of five or more connected units) as eligible structures for a reimbursement award. Although you may have been ineligible for a repair or reconstruction award due to your structure type, the program will evaluate your eligibility for reimbursement and will be in touch with you. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

7.3.2.4 Housing Recovery Services Program Recommendations

24. Public Comment: *OHCS has \$422 million to allocate. Most of the survivors in the canyon have recovered, with the help of disaster case managers. Santiam Hospital and Clinics implemented a disaster case management program in 2020 and have consistently offered case management services. The program has been recognized as FEMA and After the Fire USA for their success. The program has helped over 300 households recover (unmet needs identified by the survivor are met — the household is back in secure, stable, safe permanent housing). The program continues to case manage 35 households who are currently in the rebuild/relocate process or will begin their build in 2025 when Christian Aid Ministries returns. It is imperative that the disaster case management program remains stable as those households deserve the same equal care that the households who have recovered received. The disaster case management team still has funding opportunities to help survivors apply for. For example, fire hardening, Marion County Recovery grant, LTRG unmet needs, and Santiam Canyon Wildfire Relief Funding. The current funding for disaster case management in the Santiam Canyon ends in December 2024. I am respectfully asking OHCS to utilize some of the \$422 million to fund*

disaster case managers in the Santiam Canyon for the year 2025. By supporting the disaster case management program, you are giving the 35 households who remain unrecovered an opportunity to recover with the support of a case manager. If they do not have a case manager, many will not be able to finish the recovery plan on their own. Much of the remaining households have multiple barriers to housing. Please, consider supporting disaster case management programs with salary support.

a. Response: Thank you for highlighting the importance of the disaster case managers, currently funded through the Housing Recovery Services (HRS) program, as listed in this Action Plan. We recognize the critical role that disaster case managers have played in helping households recover and the ongoing support they provide. We understand the need for continued funding to ensure that these households receive the same level of care and support as those who have already recovered and are currently committed to funding them through HRS until June 2025. For this very reason, OHCS is currently negotiating to extend the contract until December 2025. By doing so, we aim to provide the necessary support for the remaining households to complete their recovery plans and overcome the multiple barriers to housing they face. Your feedback is invaluable, and we appreciate your dedication to the community.

7.3.2.5 Planning Program Recommendations

1. Public Comment: (Translated to English) *We do not want them to help us with money, it would be better if they helped us pay the increase in rent because salaries do not increase, and rent continues to rise. People don't earn more money and income continues to rise. If they pay us two or three months of rent, we do not solve anything, we are going to save for the following months that we are going to pay the same so we do not solve anything. Instead of helping us pay the rent, it is better that they help us stop the increase in rent.*

a. Response: Thank you for sharing your experiences and concerns. We recognize the housing crisis is impacting our most vulnerable and marginalized populations. OHCS would be happy to discuss increasing rental costs and their impact on communities. OHCS will also consider this feedback as the statewide Resilience Planning, referenced in this Action Plan, launches.

2. Public Comment: *We need to change zoning and building codes to reflect a more flammable landscape. We need to do a legislative fix for power company liability in wildfires, otherwise they will shut the power, let us burn. We need to treat fuels adjacent to evacuation routes. We need to fix federal firefighter pay, so firefighters can make a living. We need to do a tremendous amount of Rx fire, bring back low severity fire to prevent high severity fires.*

a. Response: Thank you for sharing your concerns. OHCS would be happy to investigate the possibility of discussing updates to the zoning and building codes so they may be more resilient to a flammable landscape. OHCS will also consider this feedback as the statewide Resilience Planning, referenced in this Action Plan, launches.

7.3.2.6 Bureaucracy/Slow Pace of Delivery

25. Public Comment: *We are in desperate need. The housing crisis is causing our community's infrastructure to collapse. Less bureaucracy more assistance please. The process is very long and time-consuming, and the documentation has remained the same since the first day of the fire on Sept. 8, 2020. I believe that you, like the state of Oregon, have the same information. We are tired of the repetitive process and lack of action. We need to be heard without discrimination against any of the applicants. Thank you very much.*

a. Response: Thank you for sharing your concerns. We understand the frustration and agree that the pace of recovery has not moved as quickly as any of us would have liked. Housing recovery is indeed a critical issue, and we are committed to addressing it with the utmost urgency. We acknowledge that the process can be long and time-consuming. Our goal is to streamline the procedures and provide more efficient assistance, within the terms of the grant that require OHCS to follow specific rules, regulations, and document each detail along the way. Federal funds are designed with rules and requirements that are rooted in historical learnings that spur from unfortunate circumstances of fraud, waste, and abuse of public funds. It's our goal to ensure the necessary funds reach folks who need them most, however, to do this, evidential documentation must be collected. This Action Plan Amendment proposes new award maximums for HARP to assure award amounts are calibrated correctly to the needs on the ground, it proposes a reimbursement pathway for homeowners who have already recovered and depleted personal funds or taken on heavy loans. The Amendment also includes a redesign of additional housing programs to provide further options for renters and tenants through the Affordable Housing Program and the Housing Support Services Program. We are continuously working to improve our systems and ensure that all applicants are heard and treated fairly, without discrimination.

26. Public Comment: *So, we're talking like January before this even happens. I'm in the middle of applying for phase one, and I'm almost finished. I was told I qualified for phase one, and I just put it off because I was tired of being told, "No, no, no." Even though you guys said I qualified, I didn't believe I did. So, reimbursements, we're talking like next*

year? What if my heat pump goes out? That means I purchased it after February of 2023 because I will have to replace it. I can't go without heat.

a. Response: Thank you for sharing your concerns. We understand the frustration and agree that the pace of recovery has not moved as quickly as any of us would have liked. Housing recovery is indeed a critical issue, and we are committed to addressing it with the utmost urgency. We acknowledge that the process can be long and time-consuming. Our goal is to streamline the procedures and provide more efficient assistance, within the terms of the grant that require OHCS to follow specific rules, regulations, and document each detail along the way. Federal funds are designed with rules and requirements that are rooted in historical learnings that spur from unfortunate circumstances of fraud, waste, and abuse of public funds. It's our goal to ensure the necessary funds reach folks who need them most, however, to do this, evidential documentation must be collected. This Action Plan Amendment proposes new award maximums for HARP to assure award amounts are calibrated correctly to the needs on the ground, it proposes a reimbursement pathway for homeowners who have already recovered and depleted personal funds or taken on loans. The Amendment also includes a redesign of additional housing programs to provide further options for renters and tenants through the Affordable Housing Program and the Housing Support Services Program. We are continuously working to improve our systems and ensure that all applicants are heard and treated fairly, without discrimination.

27. Public Comment: (Translated to English) *Personally, I would like to know why it has been so difficult to access the resources that the government has given to the people who were affected by the forest fires. I feel that it has been a very long and bureaucratic process when one has the need for you to give those resources. I feel that what you do is a lot of bureaucracy. I remember when I lost my house, Access had resources for us. They told us that we had to apply for different things. They told us that I had to apply for a house. So, I didn't have access to buy a house for my children. Finally, I was able to access housing. I told them that I already have a house, and they told me, "You no longer qualify because you have a house." They told me that there was a program and that I should bring them all the papers as proof and then they told me that I didn't qualify. So, if there is money available, why do they make it so difficult for one to access it? They are so detailed with the process, if a letter is missing from the name, and they want me to go fix that. There are times when we are working, and we can't go. They say that I already have a house, but they don't ask if I have a 30-year mortgage. If you have the money, why do you make it so difficult? That's what really bothers me. Why don't you give it to those who need it? If I have a 30-year mortgage, it's not because I want to, it's because I*

need it to support my family. I want to thank Virginia because she has sincerely helped me. I thank her publicly. So, if you have millions, why don't you give those of us who need it access to those resources? That's my question. Why is it so difficult to access the resources that we are entitled to by law? If you're going to offer reimbursement, then the process of receiving help should not be so difficult and everything should be more accessible.

a. Response: Thank you for sharing your concerns and experience. We understand the frustration and agree that the pace of recovery has not moved as quickly as any of us would have liked. We acknowledge that the process can be long and time-consuming yet encourage you to complete your HARP application. Our goal is to streamline the procedures and provide more efficient assistance, within the terms of the grant that require OHCS to follow specific rules, regulations, and document each detail along the way. Federal funds are designed with rules and requirements that are rooted in historical learnings that spur from unfortunate circumstances of fraud, waste, and abuse of public funds. It's our goal to ensure the necessary funds reach folks who need them most, however, to do this, evidential documentation must be collected. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. Although you may have been ineligible for a repair or reconstruction award due to the repair minimum, the program will evaluate your eligibility for reimbursement and will be in touch with you. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

28. Public Comment: (Translated to English) *I am a survivor. I want to emphasize a little what you have said here. Do I understand that you can make it true, since you are from the federal government? But in my case, we do not remember, and they told me that basically I did not want to continue. Because, well, at first, they told me specifically what the funds are for. What I want to add is that they told me, "... you do not qualify for that reason, but you can still continue with the process." In my opinion, why am I going to continue removing, as already mentioned here, a trauma? Removing, taking papers,*

looking for information, collecting things. I know that they are going to tell me no. I do not know what the purposes are, what is the reason for making one go through this, because if you have heard here, what we bring is still the feeling, the trauma of this pain of suffering that was experienced during that process. Do you understand? So why am I going to remove all these feelings? If I have to go through and go through the trauma that I experienced with the information treatment for you to tell me no and right now I am not doing it. Because what I want right now is my emotional peace, my tranquility. I don't want to say I'm going to forget because we'll never forget that. That's already part of us, yes, but I don't want you to be reminding me of it, constantly stirring it up. So, I said, you know that in the end you're going to say no. So, I understand that it's part of the process, but if you know that the person is not going to qualify because you make them go through that whole process? And they invite us to do it again? I wouldn't want to; I want my peace because that's when I get stressed. People who go through that suffer from depression, anxiety, and stress. And to remember that again? I honestly don't want to live through it. Not only have we lost our houses or our apartments or where we lived, our furniture was burned, our cars, clothes were burned. Can you help me with the house? Can you help me with an apartment, the furniture and other things that were burned? And I don't want to sound ungrateful, I'm grateful for this help, do you understand? But in my case, I want to express my support. What they have said is very difficult, it is very difficult and if you listen, you hear the voice of the people who are speaking, you hear the sound of their voice and it makes you feel pain, sadness. And that you have to go through this process again? That is why I personally decided not to do it.

a. Response: Thank you for sharing your concerns. We understand the frustration and agree that the pace of recovery has not moved as quickly as any of us would have liked. We acknowledge that the process can be long and time-consuming and can be retraumatizing for applicants. Our goal is to streamline the procedures and provide more efficient assistance, within the terms of the grant that require OHCS to follow specific rules, regulations, and document each detail along the way. Federal funds are designed with rules and requirements that are rooted in historical learnings that spur from unfortunate circumstances of fraud, waste, and abuse of public funds. It's our goal to ensure the necessary funds reach folks who need them most, however, to do this, evidential documentation must be collected. Within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. If the reimbursement program sounds like a more manageable pathway for you and your family, we encourage you to connect with Access, Unete, or other partners in Jackson, or reconnect with your

ReOregon case lead to complete your application. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

29. Public Comment: (Translated to English) *What I want to say, maybe I shouldn't say it, but let it be clear. Well, from the beginning I'm realizing, for me personally, that the state continues to make fun of the people. They put up obstacles and obstacles and now they come to tell us that they are going to collect new information, for what? Without reality, we don't know if they are going to help the victims. Even the first applicant hasn't been given any help yet. We still don't know if they are really going to be given it or not. Please, I know that you don't have much authority, or you don't want to have that authority, but please, now. We have to end this because you come from time to time and talk and brainwash your workers, but they are the ones who have to be dealing with the people. Both the workers and those seeking help feel frustrated. Please, you had two or three years to make these rules, and you still want to do more, please, don't keep playing with the people. None of the victims has looked at a single peso. Ok, so I took the time to investigate everything that is known today, and I follow you on all my social networks, but where is that money that is costing the people? And the federal money that you talk about? It is ours. Fine, but the money that we pay is not free. It is our money that we set aside from the treasury and for everyone, for our houses from the fires. It is not free, I was saying it, it is not free. It is a lot of money that the treasury set aside for the houses from the fires and where is it? It is frustrating that the money is not from the government, it is from us, it is our taxes. It is very sad that the money is stopped, it is very sad.*

a. Response: Thank you for sharing your concerns. We understand the frustration and agree that the pace of recovery has not moved as quickly as any of us would have liked. Housing recovery is indeed a critical issue, and we are committed to addressing it with the utmost urgency. We acknowledge that the process can be long and time-consuming. Our goal is to streamline the procedures and provide more efficient assistance, within the terms of the grant that require OHCS to follow specific rules, regulations, and document each detail along the way. Federal funds are designed with rules and requirements that are rooted in historical learnings that spur from unfortunate circumstances of fraud, waste, and abuse of public funds. It's our goal to ensure the necessary funds reach folks who need them most, however, to do this, evidential documentation must be collected. This Action Plan Amendment proposes new award maximums for HARP to assure award amounts are calibrated correctly to the needs on the ground, it proposes a reimbursement pathway for homeowners who have already recovered and depleted personal funds or taken on heavy loans. The

Amendment also includes a redesign of additional housing programs to provide further options for renters and tenants through the Affordable Housing Program and the Housing Support Services program. We are continuously working to improve our systems and ensure that all applicants are heard and treated fairly, without discrimination.

7.3.2.7 Outreach Efforts

30. Public Comment: *Suggestions to Address Farmworker Needs: Targeted Outreach: Include explicit references to farmworkers as a priority group in outreach efforts and ensure that housing and recovery services address their unique challenges, such as temporary or unstable housing conditions, language barriers, and limited access to services due to rural isolation. Housing and Economic Programs: Farmworkers often live in substandard housing conditions. Expanding affordable housing developments, especially in rural or agricultural areas, and ensuring that farmworker-specific housing needs (like proximity to agricultural work) are addressed in recovery plans would be essential. Language and Legal Support: Since many farmworkers might face language barriers or have undocumented status, providing services like legal support and translation services specifically for farmworkers could ensure better access to recovery programs.*

a. Response: Thank you for highlighting this vulnerable population. We are committed to prioritizing communication efforts with marginalized communities, like farm workers. ReOregon works with nonprofits and local advocates that have provided continuous support to impacted communities since the fires in 2020. This partnership builds stronger bonds within the community, provides access to language services, and meets survivors where they are. Language services are available upon request and are designated as part of the language access plan and citizen participation plan. Key program documents, including the Action Plan, program policies, and applicant-facing documentation are translated to Spanish. Additionally, the Action Plan Amendment includes the Affordable Housing Program, which gives each impacted county subrecipient the opportunity to design a program that fits the needs of their community — including rural areas — using feedback received from residents and housing advocates. Soon, the Legal Services program will be available for applicants who face hurdles in participating in our programs. We appreciate your input as we continue to improve our programs to better serve all members of our community.

31. Public Comment: (Translated to English) *"How much did this HARP pilot program cost the state? They have three organizations, and I imagine they won't do the service or work for free. Oh, sorry, but how much money did they receive to do this HARP program? Three local organizations were hired here to help with the application. You must have a number because those affected are not going to fight. Those affected by the fires, regardless of how many people or how many cases, that doesn't matter, must have a number, assigning an amount to the agencies. This information is public. I ask you. Have these organizations already been paid or do they still have the funds there and have not been delivered? I am not asking about the funds to the families because even the services that the organizations are offering did not have working printers. It is a pilot program, which they did not even prepare for. And I imagine that funds will arrive to do that work. I ask because I had to go to these organizations to receive help for these applications. The printers did not work, we were there for three, four hours.*

a. Response: Thank you for sharing your concerns regarding the HARP launch. We understand your frustration and agree that the pace of recovery has not moved as quickly as any of us would have liked. To support applicant intake and outreach efforts, HARP contracted with multiple local organizations that have deep ties to their community and unique expertise. These organizations have been critical to marketing HARP, reaching applicants in community, and providing a local presence. In Jackson County, the three local organizations provide options to applicants — both geographically and based on specific applicant needs. The amount allocated to each organization is public information and can be found in the Quarterly Performance Reports on the ReOregon website, Progress Reports webpage (oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Progress%20Reports.aspx). In Jackson County, approximately \$1.6M is contracted in total for these three organizations to support intake work, but only a small fraction of this amount has been expended to date. These organizations are only paid for the work they perform, and any remaining funding will go back to the HARP program to fund additional recovery work. These organizations **do not** have any of the HARP funding that will go to applicants for repair, replacement, or reconstruction of their homes. These organizations have working printers, scanners, and other equipment needed to support applicants throughout the HARP process. We apologize that this equipment might not have been available or working as intended during your visit and appreciate your patience and understanding as we continue to improve our processes.

32. Public Comment: *I am not a fire survivor, but I work with fire survivors every single day. This is a lot of money that's been allocated to different programs, to many different programs. My question is and what I think your question should be is, "Who's going to oversee the funds? Who is going to be accountable to make sure that," — I say this truthfully. Please don't take this wrong. I'm very protective of the community. Will we fill out paperwork for HARP? Did you receive FEMA funds? And when you do receive it, they ask you, "Did you buy a house or what did you spend it on?" They ask us, they ask the community where they use their FEMA funds. So, who's going to keep track of all these millions of dollars to make sure it's going to where it's supposed to go? Who's accountable when it doesn't? I'm saying this because we have situations like Royal Oaks. All these trailers that came in, they brought them, but nobody oversaw them. This is a lot of money for our community. It's beneficial. It's a great thing. They're coming in and really trying to help our community. So, how do we keep track of it? Who keeps track of it? And I know they are going to give it someone to keep track of and that's true. But at the end of the day, who's accountable and how do we make sure that the funds went where they were supposed to go? That's my biggest concern. I don't know if anybody else is concerned about that.*

a. Response: Thank you for sharing your concerns and for your dedication to the community. We understand the importance of accountability and transparency in managing the funds allocated to various programs. HUD requires OHCS to file Quarterly Progress Reports (QPRs) that are also publicly available on the ReOregon website, on the Progress Reports webpage (oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Progress%20Reports.aspx). Additionally, a dashboard of HARP statistics is made available for further review. Once additional programs are launched and running, further tracking mechanisms will be made available. ReOregon also has a fraud, waste, and abuse policy to report and review concerns from any employee, subrecipient, or members of the public. An online form can also be found on the ReOregon website. All substantiated cases of fraud, waste, or abuse of government funds will be forwarded to the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General (OIG). In alignment with this Action Plan process, public hearings, and public comment period, CDBG-DR grantees are required to maintain a high level of transparency and public accountability. This is fostered by publishing their action plans, clearly outlining how funds will be allocated, utilizing a transparent selection process for projects, actively engaging with the community through public meetings and outreach efforts, and providing reports on project progress and expenditures, all aimed at ensuring the public understands how disaster recovery funds are being used. ReOregon has historically sought to meet these requirements and often extending beyond, by having monthly meetings with

partners, engaging subrecipients early, and as seen in this Action Plan amendments, adjusting program and policies based on that feedback.

7.3.2.8 Program Allocations

33. Public Comment: *Cleanup was really slow. In fact, it took more than two years. I could not find another home in the [inaudible] where all my medical and dental care is. I was forced to get a home two and a half hours away in another county, and my full replacement cost of my home was going to be greater than what my insurer [inaudible] was willing to give. There are still mostly vacant lots in the park, now called Oak Ridge. It feels like some of us are being punished for getting housing outside the area in hopes that we can return ... Why aren't some monies set aside to help us low-income seniors get back into our neighborhoods? It has now been over four years since Sept. 8, 2020. We need to come home now.*

a. Response: Thank you for sharing your concerns and experience. We understand the significant financial burden that many homeowners have faced since the fires in 2020, and we are committed to providing the necessary support to help you rebuild and recover. In the original Action Plan OHCS was focused on helping individuals and families who are still displaced and living in intermediate or unsafe housing. As promised, within this Action Plan Amendment, ReOregon proposes a new reimbursement pathway within the Homeowner Assistance and Reconstruction Program (HARP), as we recognize the importance of providing support for survivors, like you, who have taken loans or depleted their personal funds to replace or rebuild their homes. The program will provide assistance for eligible, documented, pre-HARP application reconstruction and replacement recovery costs. The maximum potential award is \$100,000, based on review of documented eligible expenses that meet program standards. We appreciate your input as we prepare HARP's reimbursement program policies to better serve all members of our community.

34. Public Comment: *In order for a community to be healthy and grow, you have to have the appropriate resources for school size, for all of these things. And it seems like you guys put the cart before the horse. And so, people are taxed for schools. People are taxed for roads. People are taxed for gas. I mean, we're taxed for everything. And some of this, that you're talking about on these funds, is part of that. That's money that's already allocated to Marion County and Lane County road system through other things. So, I'm trying to understand all the funding and where it's coming from, and why is it going to already established government programs responsible for those things, and not used for things that we need?*

a. Response: Thank you for sharing your concerns. FEMA, Oregon State agencies, and local communities have identified considerable impacts on public facilities and infrastructure from the 2020 wildfires. While FEMA has determined more than \$581 million in damages to be eligible under its Public Assistance Program, that number does not reflect the entirety of the 2020 wildfires' impact. Not only was the damage considerable in scale, but the wildfires also impacted a wide range of facility types, including public buildings, roads and bridges, utilities, and parks. While budgetary allocations for PIER were made at the county level, counties and organizations within the impacted areas worked together to define the specific projects or programs to be funded. Each infrastructure, economic revitalization, and planning activity must clearly have a tie to revitalizing disaster impacted communities by directly or indirectly supporting new housing and/or replacement of damaged housing, and/or the mitigation of loss of life or property in the face of current and future natural hazards. As seen in Table 2, PIER only accounts for 10.8% of the total CDBG-DR allocation. Housing programs account for 80.6% of the total allocation, while public services account for 2.9% and the planning program is 3% of the allocation. We hope that provides clarity to your concerns.

7.3.2.9 Local Governments and Community Organizations

Public Comment: *Dear Director Bell and the OHCS DRR Team:*

I am writing to comment publicly on the proposed Substantial Action Plan Amendment (SAPA) to the ReOregon program as part of the recovery efforts from the 2020 Labor Day Fires. After reviewing the SAPA and attending both public hearings in Phoenix, OR, I have concerns regarding the reallocation of funds, projected program timelines, and potential impacts on housing recovery for fire survivors. While the increased funding for Support Services is appreciated, this reallocation away from critical housing construction raises several key concerns about long-term housing stability and recovery efforts.

- (1) **Reduced Capacity for Long-Term Housing Solutions:** *The SAPA diverts \$27.5M of funding from housing construction to support services, directly impacting the creation of new housing units; without sufficient investment in building inventory, the community risks worsening the housing crisis due to a lack of available options. Construction projects provide sustainable solutions to tackle housing shortages and decrease dependence on support services. By shifting funds away from construction efforts, we limit our ability to expand the housing supply, leaving survivors with fewer choices. A lack of housing availability is the fundamental issue that keeps demand for existing support services high, contributing to a never-ending cycle of temporary assistance instead of*

promoting long-term recovery. Ongoing housing shortages have significant social consequences, including a heightened risk of homelessness and mental health impacts. These challenges will continue without a substantial boost in housing development.

- (2) ***Administrative and Timeline Challenges:*** *The SAPA process could lead to delays before the revised programs are implemented. Looking at historical timelines of ReOregon milestones, approval, and program rollout, we can see that they have experienced significant delays, and survivors may face even longer waits for access to these updated programs. Survivors are exhausted and need immediate access to essential support and resources. These changes run the risk of further delaying current ReOregon programs. The amended programs will require staff to divert their work from focusing on rolling out the ReOregon programs that HUD has already approved. We cannot afford any further delays.*

Given these concerns, I urge OHCS to consider the following adjustments to the SAPA.

Recommendations:

- (1) ***Prioritize Funding for Housing Construction:*** *Direct all funds reallocated from HARP toward increasing housing inventory as a sustainable solution to address housing shortages.*
- (2) ***Minimize Administrative Delays:*** *Streamline the SAPA process to reduce unnecessary administrative expenses and expedite access for survivors, including starting programs that are not being amended immediately and opening all phases of programs simultaneously. Opening all recovery avenues — replacement, repair, and rehabilitation — simultaneously reduces the ongoing economic and mental health impacts that rolling administrative delays inflict upon our survivors. Shifting resources from housing construction to support services may not deliver the lasting impact we need. Feedback and recommendations from our community's fire survivors are loud and clear. Support services are not effective when no affordable options are available. By prioritizing housing production and speeding up the amendment's timeline, OHCS can better meet the community's needs with more sustainable, lasting, and effective solutions.*

Sincerely,

Caryn Wheeler Clay, MPH Executive Director Jackson County Community Long-Term Recovery Group

RESPONSE: We appreciate the feedback and continued partnership of the Jackson County Long-Term Recovery Group in Jackson County's recovery and appreciate the feedback on the draft Substantial Action Plan Amendment.

In response to the Jackson County LTRG's comments:

1. We understand and agree with concerns about a lack of affordable housing in Jackson County. HARP was designed primarily to rehouse disaster-impacted homeowners and based on recent analyses of both Eligibility Questionnaire completions and applications, we feel that the reduced amount of funding will be enough to serve all eligible applicants. The resulting reallocation of funding from HARP to the Affordable Housing Development Program was intended to directly address this problem of limited affordable housing stock by providing funding directly to counties to tailor to local needs like the creation of new housing units. The Affordable Housing Development Program was developed for this purpose.
2. While the Substantial Action Plan Amendment process is a necessary and important step to solicit public feedback and ensure program design decisions are meeting public needs, we agree that this causes delays in implementing programs that must wait for this feedback and HUD approval before proceeding. However, OHCS has already developed draft policies, has begun developing forms, tools, templates, and communication material, and has drafted subrecipient agreements to ensure that progress is not stopped while the consultation and HUD approval process takes its course.
3. The Action Plan Amendment provides more than \$30M in additional funding to the Affordable Housing Development Program that Jackson County may elect to develop new affordable housing. As additional funding is determined available, it may be allocated to further provide these opportunities.
4. Existing programs, including HARP, PIER, and IHA (which will become a part of HSS in the amendment), are already moving forward. For HARP, construction pathways are coming available now. Home purchases preceded construction because support structures were available for that pathway sooner. Each pathway has unique challenges, and we are working to provide assistance to applicants as quickly as it becomes available.
5. OHCS has heard the feedback about the additional benefits, including reimbursement, not being similarly phased. The amendment has been modified to ensure that reimbursements are not phased when the application is ready for "reimbursement only" applicants.

Public Action Plan for Community Development Block Grant Disaster Recovery
(CDBG-DR)



LANE COUNTY BOARD OF COMMISSIONERS

Heather Buch
Ryan Ceniga
Pat Farr
David Loveall
Laurie Trieger

November 5, 2024

Andrea Bell
Oregon Housing and Community Services
North Mall Office Building
725 Summer Street NE, Suite B
Salem, OR 97301-1266

Dear Executive Director Bell,

We, the Lane County Board of Commissioners, are grateful for the opportunity to provide feedback on the October 2024 Substantial Action Plan Amendment to the ReOregon Action Plan. We are grateful for the continued partnership with Oregon Housing and Community Services as we work together to support survivors of the 2020 Holiday Farm Fire.

We are excited to highlight several valuable improvements included within this Action Plan Amendment:

- 1) We appreciate the plan to award Affordable Housing Development funds directly to counties to invest and distribute. This is an important opportunity to leverage our local expertise and capacity to support the construction of affordable homes in the McKenzie River Valley.
- 2) We applaud the plan amendment to expand options for renters who were displaced by the Holiday Farm Fire. The initial Action Plan allocated funds to construct home ownership opportunities for displaced renters. This amendment includes a pathway to construct affordable rental housing – an important change that will increase the diversity of affordable housing options in the fire-affected area.
- 3) We are pleased to see a pathway to reimburse reconstruction and recovery costs for eligible households who have already begun or completed rebuilding.
- 4) We appreciate the language explicitly including as eligible those residents who resided in non-traditional homes including RVs.
- 5) We believe the inclusion of Accessory Dwelling Units (ADU) in the reconfigured Affordable Housing Development (AHD – formerly HOP) program is particularly beneficial for the recovery of rental housing stock in the McKenzie Valley. We hope that OHCS would support a legislative effort to remove the two-acre minimum for ADU placement on parcels zoned for rural residential dwellings.

We also respectfully request refinements before the final Action Plan Amendment is submitted to HUD for approval:

- 1) As one of five Guiding Principles, the 2018 Oregon Disaster Recovery Plan states:

Recovery will be a locally driven process. The state does not seek to direct communities through the recovery process. Rather, the state's role is to provide guidance, technical assistance, and resources to local entities in support of their community recovery goals.

It is within this spirit that Lane County has consistently advocated for locally directed flexibility when allocating funds among different ReOregon programs like PIER, HOP, and HARP. The communities affected by the 2020 Labor Day fires have very different circumstances; some are urban and some are rural. Some need relatively more funding for infrastructure while others require comparatively more funding for housing. We respectfully request OHCS include within this amendment a provision allowing counties to determine the amount of funding allocated within each of the ReOregon programs in future budget adjustments among the approved programs.

- 2) OHCS signals a shift in priority from a state-managed reconstruction program to a homeowner-managed reconstruction program. While we value the options this provides for some residents, we have concerns that some residents may be challenged to effectively manage their own home reconstruction process.
 - a. Home construction is a complicated and intensive process that can be challenging, particularly for those who are unstably housed, those with untreated trauma, seniors, and those with limited computer proficiency.
 - b. A homeowner-managed program will result in homeowners contracting directly with designers and builders. This requires homeowners to vet and select contractors – a process that can be difficult and time consuming. This also exposes homeowners to the risk of hiring unscrupulous or fraudulent contractors.
 - c. Homeowners will be required to procure design and construction services in compliance with a variety of very complex federal procurement requirements.

We respectfully request OHCS clearly detail the supports that will be made available to help residents who are managing their own reconstruction process. In our experience, local trusted partners can provide navigation services for survivors that can make rebuilding easier, faster, and more efficient.

- 3) We support the proposal by OHCS to operate a statewide Down Payment Assistance Program. We request OHCS make county-by-county allocations for DPA - with any substantial remainder repurposed within the designated county rather than being used for DPA in other counties or otherwise reallocated.

- 4) We request OHCS develop and publish county by county targets for the use of HARP funds. This will allow local partners to better understand and anticipate the likely spending in their area. We similarly request OHCS develop a plan to adjust spending if the use of HARP funds is significantly missing the established spending targets.
- 5) We request OHCS take this opportunity to revise the methodology used to allocate PIER funds. The current methodology relies on the number of dwellings destroyed as a primary factor to calculate the relative portion of PIER funds allocated to each county. This creates a bias that benefits more densely populated communities and disadvantages the more rural communities that typically have a greater relative need for infrastructure. When calculating the allocations by county, we request OHCS remove the *number of dwellings destroyed* as a factor.

We note the experience of multiple other states that have administered CDBG-DR funds, making it clear that multiple adjustments will be needed as needs on the ground change. OHCS could do much now to set the stage for future budget adjustments within the Action Plan and we encourage the agency to take full advantage of this open window.

Thank you for incorporating our feedback.


Respectfully,


Laurie Trieger, Chair


Heather Buch


David Loveall, Vice-Chair


Ryan Ceniga


Pat Farr

Lane County Board of Commissioners

RESPONSE:

We appreciate the Lane County Board of Commissioners' feedback on OHCS's proposed Action Plan Amendment. We appreciate the positive feedback about several changes including having Affordable Housing Development program funding be administered by the county, expanded options for renter support, new assistance to reimbursement homeowners for completed recovery work, and expanded eligibility for both applicants and housing options. We also appreciate Lane County's help to identify and formulate these changes as we developed this Action Plan amendment.

In response to the county's feedback:

- OHCS would be happy to meet. OHCS won't be able to provide support or opinions on any legislative concepts until the governor has an opportunity to review. But we would be happy to answer any logistical questions relating to your legislative concepts.
- **Suggestions 1 and 3:** We have considered the county's request to add further local control in allocating CDBG-DR funding.
 - We took the county's input into account when designing the Affordable Housing Development Program, including offering expanded recovery options, leaving decision-making to local communities, and reallocating funding from HARP to provide more resources for counties to administer themselves.
 - PIER also allows for community-driven decision-making in allocation of resources to meet each community's unique needs.
 - For downpayment assistance under HSS, there are dedicated amounts for each county that will stay in each county. These will be reflected in procurement documents to identify downpayment assistance providers in each county. We have not published these in the SAPA because we want to retain flexibility to use HSS funding across rental assistance (IHA), Down Payment Assistance, and Housing Counseling based on county need. If downpayment assistance demand is lower but rent assistance is higher for a particular county, the design of Housing Support Services allows flexibility to accommodate this. If Housing Support Services demand in total is lower than the dedicated amounts designated, we will work with the county to reallocate funding to PIER or AHD in a future amendment.
 - For HARP, we have intentionally chosen for these to be adaptable to an unknown demand in each county for housing repair, replacement, and considering the added reimbursement benefit. CDBG-DR funding requires development of an unmet needs analysis that determines allocations for various

needs statewide and continuing to prioritize HARP aligns with the Action Plan's unmet needs analysis, which recognizes restoration of single-family housing for those impacted, regardless of the underlying distribution by county. Counties and local organizations will have a hand in outreach and management of this program and can influence the program's uptake amount locally impact for residents.

- In addition to the aforementioned items, and in desire to meet the spirit of local flexibility from this comment, OHCS intends to take meaningful steps to work with Counties and determine how funds can shift between programs based on local needs and within alignment to CDBG-DR requirements, specifically the unmet needs analysis and LMI requirements. To accomplish this while not delaying current changes in this SAPA, OHCS intends to engage with Counties to determine if non-substantial reallocations can be made between programs, as well commit to a date for a future substantial amendment if required to meet that need. Specifically, OHCS will work to establish soft set-asides of total CDBG-DR resources within counties, with intention that if demand for existing ReOregon programs is less than those resource set asides, reallocations within those counties based on their local needs can occur. If a SAPA is needed to accomplish this, the reallocation will be reviewed by OHCS during Quarter 3 2025, coinciding with the next SAPA process and planning. Any reallocations will be subject to LMI and unmet need allocation constraints.
- **Suggestion 2:** We have been working closely with local partners in all counties to stand up homeowner-managed construction processes.
 - We agree that this process carries risks, and we have worked to mitigate these risks in a variety of ways, including, but not limited to:
 - Providing website information, checklists, guides, and other materials to inform contractors and the public of both the process and requirements for a homeowner-managed pathway.
 - Providing case leads and construction advisors to guide applicants through every step of the process.
 - Developing template contracts for applicants to use that include all required federal requirements.
 - Designing inspections and payment processes that ensure contractors don't receive payment until work is confirmed to be complete, matches scope, and meets quality standards.
 - We also plan to discuss housing navigation support with the county and other local partners to help further support applicants. That said, we understand that

homeowner-managed construction is not a fit for every applicant. We are working to stand up state-managed construction in the near future to provide further choice to applicants that do not wish to participate in the homeowner-managed pathway.

- **Suggestion 4:** OHCS seeks to serve every eligible applicant for HARP repair, reconstruction, or replacement support statewide, regardless of county. We also seek to support eligible applicants seeking reimbursement with the goal of serving every eligible applicant if funding allows. We do not think it is consistent with CDBG-DR funding goals to reserve funding for this critical support for counties to reallocate in the event demand does not meet expectations if that means other counties are unable to serve eligible homeowners, however we are committing to assess this related to overall soft set-asides of CDBG-DR funding.
- **Suggestion 5:** Finally, we respectfully decline to change the PIER funding methodology. Allocations have already been made by the state to counties and counties have already begun making project selection decisions based on those allocations. The state feels that those allocations have been equitable and that making changes to funding decisions already determined and publicly communicated is not in the best interest of the program.

We agree with the county assessment that this is not the last adjustment to the CDBG-DR Action Plan that should be expected. We invite the county to continue discussing its ideas for Action Plan and program changes as we proceed. We hope that the decisions the county acknowledged in its letter are indicative of our receptiveness to, and appreciation for, the county's ideas for improvement. Many of the other requests are major changes that would require significant consultation with other counties, so we hope that this isn't the end of this conversation, but an opportunity to discuss these ideas and identify statewide solutions in partnership with other counties in the future.



November 7, 2024

Andrea Bell
Oregon Housing and Community Services
North Mall Office Building
725 Summer Street NE, Suite B
Salem OR 97301-1266

Dear Executive Director Bell:

Our two nonprofits, the McKenzie Valley Long Term Recovery Group of Lane County (MVLTRG) and the McKenzie Community Land Trust (MCLT), were stood up by community members and stakeholders to help with housing recovery after the Holiday Farm Fire. Four years after the fire, our rural and unincorporated community is at 38% rebuild and it costs 40% more to rebuild a home. The MVLTRG and MCLT are the two primary nonprofit / community-based organizations leading housing recovery in the fire footprint. We have both worked in partnership with Oregon Housing and Community Services (OHCS), Oregon Department of Human Services, Lane County, and local partners to help rebuild our community. In these roles, we are grateful for the opportunity to provide input on the October 2024 Substantial Action Plan Amendment (SAPA) to the ReOregon Action Plan.

We would like to underscore a number of plan amendments that we see as valuable changes recommended in the SAPA.

1. We appreciate OHCS's efforts to distribute funding as closely as possible to the communities being served and the organizations facilitating that work. Affordable Housing Development (AHD) awards to counties, that are in turn available to award to community-based organizations with deep local knowledge, experience and expertise, can result in more rapid recovery. For example, MVLTRG has partnered with Lane County on a *Rapid Rehousing Initiative* with separate (not CDBG-DR) funds that will result in the first 12 homes placed for the most vulnerable fire survivors in less than one year (from contract signing date to implementation).
2. The state's decision to recommend expanded options for renters who were displaced by the Holiday Farm Fire is a critically important amendment. While the original Action Plan focus on transitioning fire-displaced renters to homeownership was well-intentioned, it did not adequately address the myriad challenges that would prevent a sizable percentage of such renters from becoming homeowners. The recommendation to include support for both affordable homeownership funding AND construction of affordable rental housing will effectively serve many more fire survivors.
3. We support the recommendation to reimburse reconstruction and recovery costs for eligible households who have already begun or completed rebuilding.
4. We support language including as eligible for financial assistance those residents who resided in non-traditional homes, including RVs, prior to the fire. With that said, we also want to recognize the care that must be taken in qualifying residents as eligible for this benefit, given that there is very little documentation to support that pre-fire residency.

5. We support the recommendation to include Accessory Dwelling Units (ADUs) as an eligible option for recovery of affordable rental housing in the McKenzie Valley. The rural, unincorporated nature of the valley makes it difficult to recover permanent rental housing using more standard strategies such as multifamily units that are feasible in urban settings. This amendment will be effective in addressing that challenge.

We also respectfully ask that additional refinements be included before the final Action Plan Amendment is submitted to the US Department of Housing and Urban Development (HUD) for approval.

1. As one of five Guiding Principles, the 2018 Oregon Disaster Recovery Plan states:

Recovery will be a locally driven process. The state does not seek to direct communities through the recovery process. Rather, the state's role is to provide guidance, technical assistance, and resources to local entities in support of their community recovery goals.

“Local” and “community” are often seen as synonymous with “county” when considering allocation of state funds. We commend the effort to deliver funds to the county level, empowering more local flexibility in prioritizing needs according to local conditions. However, we would also note that the role of proven community-based organizations (CBOs) must also be recognized and highlighted for their ability to provide more equitable and effective recovery services than even county-level government can provide alone. In fact, it is a partnership between Lane County and CBOs that have resulted in the most effective post-fire recovery work for the Holiday Farm Fire to date, and perhaps across Oregon.

With this in mind, and given that we are nearing Year 5 of post-fire recovery, we respectfully request that:

- a. OHCS include within this amendment allowing counties to determine the amount of funding allocated within each of the ReOregon programs in future budget adjustments among the approved programs; and,
 - b. A provision also be included requiring that counties recognize, consult, and partner with those CBOs which have proven their ability to deliver recovery results within their respective fire-impacted communities when determining allocation of funds provided through ReOregon programs. Such nonprofit organizations are easily identifiable based on their fire recovery work to date, and must be engaged throughout the recovery process going forward as a first step, not an afterthought.
2. OHCS signals a shift in priority from a state-managed reconstruction program to a homeowner-managed reconstruction program. While we value the options this provides for some residents, we have concerns that some residents may be challenged to effectively manage their own home reconstruction process. Local Disaster Case Managers (DCMs) have already demonstrated their ability to help fire survivors navigate home replacement processes.
 - a. Home construction is a complicated and intensive process that can be challenging, particularly for those who are unstably housed, those with untreated trauma, seniors, and those with limited computer proficiency.
 - b. A homeowner-managed program will result in homeowners contracting directly with designers and builders. This requires homeowners to vet and select contractors – a process that can be

Public Action Plan for Community Development Block Grant Disaster Recovery (CDBG-DR)

difficult and time consuming. This also exposes homeowners to the risk of hiring unscrupulous or fraudulent contractors.

- c. Homeowners will be required to procure design and construction services in compliance with a variety of very complex federal procurement requirements.

We respectfully request OHCS clearly detail the supports that will be made available to help residents who are managing their own reconstruction process. In our experience, local trusted partners can provide navigation services for survivors that can make rebuilding easier, faster, more efficient, and more secure. Such support should include local CBOs, built upon the strong, trusted relationships already built by DCMs who have been supporting survivors for nearly four years. We request that OHCS designate sufficient funding to offset the cost of those services provided by local CBOs.

3. We support the proposal by OHCS to operate a statewide Down Payment Assistance Program. We request OHCS make county-by-county allocations for DPA - with any substantial remainder repurposed within the designated county rather than being used for DPA in other counties or otherwise reallocated.
4. We request OHCS develop and publish county by county targets for the use of HARP funds. This will allow local partners to better understand and anticipate the likely spending in their area. We similarly request that OHCS develop a plan to adjust spending if the use of HARP funds is significantly missing the established spending targets.
5. We request that OHCS publish statewide updates on recovery progress on at least a quarterly basis. Such updates to include, but not be limited to:
 - a. number and type of applicant for each ReOregon program component
 - b. status of applications (ineligible, eligible, policy hold, funded, etc.)
 - c. number of and type of homes started and completed in each fire footprint
 - d. running tally of progress toward HUD national objectives so that each county can track their progress in helping to meet the objectives at the local level
6. We request OHCS take this opportunity to revise the methodology used to allocate PIER funds. The current methodology relies on the number of dwellings destroyed as a primary factor to calculate the relative portion of PIER funds allocated to each county. This creates a bias that benefits more densely populated communities and disadvantages the more rural communities that typically have a greater relative need for infrastructure. When calculating the allocations by county, we request OHCS remove the number of dwellings destroyed as a factor.

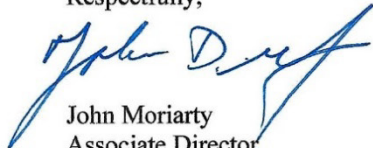
Additional Questions and Comments

1. We have been told that specific funds are available for housing recovery planning work, but have not been “unlocked.” We request that:
 - a. OHCS clarify planning, legal, ESAs, and other available CDBG-DR funds that are still untapped
 - b. OHCS make these funds available to 2020 fire-impacted communities to facilitate recovery as additional building funds move closer to awards

- c. such availability be focused at county level and include communication, outreach, and partnership with those community-based fire recovery organizations who are already engaged with OHCS and county partners to recover housing stock destroyed in the 2020 Labor Day wildfires and straight-line winds.
2. Recognizing that pre-construction NEPA assessments may be necessary for some construction, and that we are already more than 4 years post-fire, we want to underscore the importance of completing required assessment work sooner rather than later. We encourage OHCS to take all steps necessary to enable prompt completion of pre-building requirements. Specifically, we request that:
 - a. OHCS confer with HUD to determine if there are any building situations that may be eligible for waiver of NEPA review, for example ADU construction
 - b. OHCS release funding for NEPA review for addresses that have been deemed “eligible” by the ReOregon review process and are now awaiting approval
 - c. allow environmental review to move forward on such properties immediately, prior to final approval, in order to be prepared to begin construction as early as possible during the 2025 building season
3. We ask that OHCS recognize that when property comes available that would be appropriate for affordable housing, it must be purchased in a timely manner so the housing opportunity is not lost. We encourage OHCS to clarify procedures, requirements, and limitations on the purchase of suitable vacant property for the construction of housing, so that opportunities to secure limited buildable land are not lost. Please clearly define what are the funding and/or reimbursement options for such purchases.
4. While recognizing the importance of serving the most economically vulnerable wildfire survivors, we also want to strongly encourage OHCS flexibility, to the greatest extent possible, when considering development of housing for people up to 120% AMI. In disaster, middle income families are struggling to recover too - especially in rural communities.
5. Attached as an addendum to these comments and questions, is a brief summary of early findings on the demand for workforce housing development to meet the needs of local organizations (including small businesses, McKenzie Community School and the US Forest Service) to fill job openings. It underscores the importance of affordable homeownership, affordable rental housing, and support for residents who are between 80% and 120% AMI.

We appreciate your time and consideration and look forward to continuing our partnership as we work together to recover the McKenzie Valley community.

Respectfully,



John Moriarty
Associate Director
McKenzie Valley LTRG of Lane County

Respectfully,



Brandi Crawford Ferguson
Interim Executive Director
McKenzie Community Land Trust

RESPONSE:

We appreciate your feedback on OHCS's proposed Action Plan Amendment and appreciate the positive feedback about several changes including local control over Affordable Housing Development program funding, expanded options for renter support, new assistance to reimbursement homeowners for completed recovery work, and expanded eligibility for both applicants and housing options. We also value the partnership of the MVLTRG and the MCLT in building new housing, supporting ReOregon work, and providing valuable feedback to inform McKenzie Valley's recovery.

In response to the MVLTRG and MCLT's suggestions:

- **Suggestion 1a:** OHCS seeks to serve every eligible applicant for HARP repair, reconstruction, or replacement support statewide, regardless of county. We also seek to support eligible applicants seeking reimbursement with the goal of serving every eligible applicant if funding allows. We do not think it is consistent with CDBG-DR funding goals to reserve funding for this critical support for counties to reallocate in the event demand does not meet expectations if that means other counties are unable to serve eligible homeowners. For this reason, we respectfully disagree with this suggestion.
- **Suggestion 1b:** While we have not included a requirement to “recognize, consult, and partner” with CBOs in the Substantial Action Plan for the Affordable Housing Development program, we have included required citizen participation and outreach and engagement with community in the Affordable Housing Development Policy. We have given local governments discretion in how they design and carry out their own programs to meet local needs, but they must demonstrate their compliance with these consultation requirements.
- **Suggestion 2:** We have been working closely with local partners in all counties to stand up homeowner-managed construction processes.
 - We agree that this process carries risks, and we have worked to mitigate these risks in a variety of ways, including, but not limited to:
 - Providing website information, checklists, guides, and other materials to inform contractors and the public of both the process and requirements for a homeowner-managed pathway.
 - Providing case leads and construction advisors to guide applicants through every step of the process.
 - Developing template contracts for applicants to use that include all required federal requirements.

- Designing inspections and payment processes that ensure contractors don't receive payment until work is confirmed to be complete, matches scope, and meets quality standards.
- We also plan to discuss housing navigation support with the county and local partners, including additional disaster case management support, to help further support applicants. That said, we understand that homeowner-managed construction is not a fit for every applicant. We are working to stand up state-managed construction in the near future to provide further choice to applicants that do not wish to participate in the homeowner-managed pathway.
- **Suggestions 3 and 4:** We have considered the request to add further local control in allocating CDBG-DR funding.
 - We took into account local input when designing the Affordable Housing Development program, including by offering expanding recovery options, leaving decision-making to local communities, and reallocating funding from HARP to provide more resources for counties to administer themselves.
 - PIER also allows for community-driven decision-making in allocation of resources to meet each community's unique needs.
 - For downpayment assistance under Housing Support Services, there are dedicated amounts for each county that will stay in each county. These will be reflected in procurement documents to identify downpayment assistance providers in each county. We have not published these in the SAPA because we want to retain flexibility to use Housing Support Services funding across rental assistance (IHA), Down Payment Assistance, and Housing Counseling based on county need. If downpayment assistance demand is lower but rent assistance is higher for a particular county, the design of Housing Support Services allows flexibility to accommodate this. If Housing Support Services demand in total is lower than the dedicated amounts designated, we will work with the county to reallocate funding to PIER or AHD in a future amendment.
 - For HARP, we have intentionally chosen for these to be adaptable to an unknown demand in each county for housing repair, replacement, and considering the added reimbursement benefit. CDBG-DR funding requires development of an unmet needs analysis that determines allocations for various needs statewide and continuing to prioritize HARP aligns with the Action Plan's unmet needs analysis, which recognizes restoration of single-family housing for those impacted, regardless of the underlying distribution by county. Counties and local organizations will have a hand in outreach and management of this

program and can influence the program's uptake amount locally-impact for residents.

- In addition to the aforementioned items, and in desire to meet the spirit of local flexibility from this comment, OHCS intends to take meaningful steps to work with counties and determine how funds can shift between programs based on local needs and within alignment to CDBG-DR requirements, specifically the unmet needs analysis and LMI requirements. To accomplish this while not delaying current changes in this SAPA, OHCS intends to engage with counties to determine if non-substantial reallocations can be made between programs, as well commit to a date for a future substantial amendment if required to meet that need. Specifically, OHCS will work to establish soft set-asides of total CDBG-DR resources within counties, with intention that if demand for existing ReOregon programs is less than those resource set-asides, reallocations within those counties based on their local needs can occur. If a SAPA is needed to accomplish this, the reallocation will be reviewed by OHCS during Q3 2025, coinciding with the next SAPA process and planning. Any reallocations will be subject to LMI and unmet need allocation constraints.
- **Suggestion 5:** The state welcomes ideas for improving its reporting on recovery progress and would be interested in discussing this further with the MVLTRG and MCLT. Existing reports on the ReOregon website provide some of the requested metrics, including a Quarterly Performance Report and a "HARP by the numbers" HARP, found on the Progress Reports webpage (oregon.gov/ohcs/disaster-recovery/Pages/ReOregon-Progress%20Reports.aspx). We anticipate expanding these reports as we move forward with awarding construction funding and launch additional programs. We will take the suggestions provided into account and will work with you to get continuous feedback on our reporting to make sure it best serves your community.
- **Suggestion 6:** We respectfully decline to change the PIER funding methodology. Allocations have already been made by the state to counties and counties have already begun making project selection decisions based on those allocations. The state feels that those allocations have been equitable and that making changes to funding decisions already determined and publicly communicated is not in the best interest of the program.

In response to the MVLTRG and MCLT's questions:

- **Question 1:** OHCS is working to complete all necessary steps to finalize the remaining recovery programs, including Resilience Planning and Legal Services, and prepare for launch in 2025. It is unclear what "ESA or other programs" are being

referenced. The state would be happy to discuss next steps on the programs in question with the MVLTRG and MCLT.

- Legal Services will support fire-impacted households as they navigate housing programs and their recovery, and will be implemented at the state, regional, or local levels depending on the capacity of legal service providers.
- Regarding the Resilience Planning program, the governor's office is leading this effort in collaboration with OHCS. The statewide plan will be developed in partnership with community stakeholders (counties, community partners, and others), to create a more holistic and comprehensive plan. **Question 2a:** The state has worked in close partnership with HUD on NEPA requirements for all ReOregon programs. There is no ability for either OHCS or HUD to waive NEPA for any CDBG-DR-funded work.
- **Question 2a:** The state has worked in close partnership with HUD on NEPA requirements for all ReOregon programs. There is no ability for either OHCS or HUD to waive NEPA for any CDBG-DR-funded work.
- **Question 2b and 2c:** OHCS will be performing the environmental review for almost all projects funded by ReOregon. In those instances, OHCS will not be funding separate environmental reviews beyond the one performed by the state. If this question is about one of these programs, the state invited the MVLTRG and MCLT to discuss this so we can better understand and respond. For the Affordable Housing Development Program, the details of policy are still being discussed with counties, so we are unable to release funding for environmental review before policy has been completed and counties have determined local priorities for funding. No projects for this program have been determined eligible.
- **Question 3:** The state cannot provide parameters for the purchase of vacant land before the Affordable Housing Development program policies have been completed and counties have determined their own local priorities, program designs, and policies. Depending on the outcome of each of these items (for example, based on a county's program design decision), the purchase of vacant property may be ineligible or the purchase may be eligible with a wide range of restrictions. OHCS would welcome further discussion with the MVLTRG and MCLT to understand its goals and provide further guidance to the extent possible given the current state of the program.

- **Question 4:** In general, OHCS has provided the greatest amount of flexibility to local governments to design programs with income restrictions that suit their needs. Although 85% of the funding must meet low- and moderate-income national objectives, there are a variety of ways to achieve this while also developing housing for incomes greater than 80% AMI. We encourage the MVLTRG and MCLT to discuss options with the county and with OHCS.

7.4 Data Sources/Methodologies

7.4.1 Housing Unmet Needs Calculation

7.4.1.1 HUD Unmet Needs Calculation Methodology

For its unmet housing needs calculation, HUD considers major low, major high, and severe damage categories for both owner and renter households, which are defined in the Federal Register Notice for calculating unmet recovery needs. For owner-occupied properties, this means anyone with real property damages above \$8,000 or \$3,500 in personal property damages. For renter-occupied properties, the threshold includes anyone with more than \$2,000 in personal property damages. There are additional details below on the damage categories by owner-occupied and renter- (tenant) occupied households. Generally, FEMA categorizes manufactured homeowners who owned their unit as owners, even when their unit is placed on leased land.

Owner-Occupied Households

Real or Personal Property Damage Categories

- Minor Low:
 - Less than \$3,000 in FEMA-inspected real property damage or less than \$2,500 in FEMA-inspected personal property verified loss
- Minor High:
 - \$3,000 to \$7,999 in FEMA-inspected real property damage or \$2,500 to \$3,499 in FEMA-inspected personal property verified loss
- Major Low:
 - \$8,000 to \$14,999 in FEMA-inspected real property damage or \$3,500 to \$4,999 in FEMA-inspected personal property verified loss

- Major High:
 - \$15,000 to \$28,800 in FEMA-inspected real property damage or \$5,000 to \$9,000 in FEMA-inspected personal property verified loss
- Severe:
 - Greater than \$28,800 in FEMA-inspected real property verified loss or determined destroyed or greater than \$9,000 in FEMA-inspected personal property verified loss or determined destroyed

Renter-Occupied Households

Personal Property

- Minor Low:
 - Less than \$1,000 in FEMA-inspected personal property verified loss
- Minor High:
 - \$1,000 to \$1,999 in FEMA-inspected personal property verified loss
- Major Low:
 - \$2,000 to \$3,499 in FEMA-inspected personal property verified loss
- Major High:
 - \$3,500 to \$7,500 in FEMA-inspected personal property verified loss
- Severe:
 - Greater than \$7,500 in FEMA-inspected personal property verified loss

While the FEMA IA data are incomplete in presenting the true level of impact to owners and renters, it is the best available dataset available to the State that distinguishes between impacted owners and renters. The table below demonstrates the relative percentages of owners and renters who:

- Applied to FEMA IA (total registrants).
- Had a FEMA verified loss (FVL) greater than \$0 (total FVL over \$0).
- Experienced major to severe levels of FEMA verified loss (total major to severe).

The data analysis in this table also includes the average FEMA verified loss for owners and renters (average FVL in \$).

Table 106: Average FEMA Verified Loss for Owners and Renters

FEMA Individual Assistance	Owner	Owner %	Renter	Renter %	Unidentified	Total
Total Registrations	6,958	29%	17,055	71%	25	24,038
Total FVL Over \$0	1,835	47%	2,089	53%	0	3,924
Total Major to Severe	1,427	47%	1,605	53%	0	3,032
Average FVL \$	\$46,255	N/A	\$5,847	N/A	N/A	N/A

Data from FEMA FIDA 40449 4562, February 17, 2022.

7.4.1.1.1 FEMA/SBA Multiplier

OHCS has calculated the ratio and derived what is called an SBA multiplier, using a subset of FEMA IA applicants with the following:

- Major and severe HUD-defined damages of FEMA verified loss
- SBA verified loss and FEMA real property verified loss

The use of an SBA multiplier is the methodology that HUD has used for projecting a more accurate estimated need, as the SBA inspection conceivably covers the cost of bringing the home back to pre-disaster condition, while FEMA inspections are based on the amount needed for a homeowner to make the home safe, sanitary, or functional. The following table shows the number of households that registered with both FEMA IA and the SBA and calculates the SBA multiplier.

Table 107: Ratio of SBA to FEMA Verified Loss for SBA Multiplier

Damage Category	No. of Owner Registrations (both FEMA and the SBA)	Total SBA Verified Loss	Total Real Property FEMA Verified Loss	Ratio of SBA to FEMA Verified Loss = SBA Multiplier (SBA FVL/FEMA Real Property FVL)
Severe	168	\$25,028,153	\$14,817,592	1.69
Major High and Low	22	\$1,046,927	\$430,701	2.43
Total	190	\$26,075,080	\$15,248,293	1.71

When this multiplier is applied across FEMA IA owner-occupied registrants with major to severe FEMA verified losses, there would be an estimated \$143,105,403 in owner-occupied losses, as laid out in the table below.

Table 108: Average Owner Loss with SBA Multiplier

FEMA IA Damage Category	Ratio of SBA to FEMA Verified Loss (SBA Multiplier)	Total Owner Count with FEMA Verified Loss	Total Owner FEMA Verified Loss	Estimated Total Owner Loss with SBA Multiplier	Average Owner Loss with SBA Multiplier
Severe	1.69	1,147	\$81,740,816	\$138,141,978	\$120,437
Major High and Low	2.43	280	\$2,042,562	\$4,963,425	\$17,727
Total	1.71	1,427	\$83,783,378	\$143,105,403	N/A

Because FEMA does not assess real property damages for rental properties, to project the rental housing replacement need, OHCS uses the average owner loss with SBA multiplier and projects that onto the renter FEMA IA population, as demonstrated in the table below.

Table 109: Estimated Rental Loss with SBA Multiplier

FEMA IA Damage Category	Total Renter Count with FEMA Verified Loss	Average Owner Loss with SBA Multiplier	Estimated Total Renter Loss with SBA Multiplier
Severe	745	\$120,437	\$89,726,045
Major High and Low	860	\$17,727	\$15,244,806
Total	1,605	N/A	\$104,970,851

Using the SBA-FEMA methodology with FEMA IA data, the owner and renter housing loss is detailed in the table below. However, the State knows that this assessment undervalues the actual costs to recover from the residential damages caused during the 2020 Wildfires and therefore additional analysis is performed in the next section.

Table 110: Sum of Owner and Renter Loss using SBA Multiplier

FEMA IA Damage Category	Total Registrant Count	Estimated Loss with SBA Multiplier	Percentage of Total
Owner – Major to Severe	1,427	\$143,105,403	58%
Renter – Major to Severe	1,605	\$104,970,851	42%
Total	3,032	\$248,076,254	100%

7.4.1.2 Alternative Methodology: Estimated Costs to Replace Damaged and Destroyed Housing

According to OEM and local damage assessments, the actual number of residential units that were damaged or destroyed in the 2020 Wildfires is 4,326, or nearly 30% more than the 3,032 valid FEMA registrants with major to severe damages; therefore, the FEMA IA data registrant totals do not reflect the actual number of residential units that were damaged or destroyed. In addition, based on OHCS research, the SBA-estimated loss does not reflect the current costs to reconstruct or replace damaged or destroyed housing—including affordable housing or building back more resiliently—in the HUD MIDs and Klamath County.

Because of the limits of the FEMA and SBA data, OHCS performed additional analysis to calculate a more accurate projection of the costs to rebuild or replace major damaged or destroyed housing. The housing damage analysis performed by OEM and local governments does not include a distinction between owner-occupied and renter-occupied units but includes a breakdown based on structure type. The analysis below includes an average estimate of cost based on average costs across different structure and reconstruction types.

Table 111: Sources for Average Cost to Rebuild Resiliently

Source	Average Unit Cost
SBA Average Verified Loss	\$210,222
Affordable Multifamily Cost per Unit	\$314,347
Manufactured Home Cost per Unit in Investor-Owned Parks with Site Improvements	\$139,117
Modular Cost per Unit in Affordable Parks (including land and infrastructure)	\$331,817

Source	Average Unit Cost
Manufactured Home Cost per Unit in Affordable Parks (including land and infrastructure)	\$305,000
November 2021 Zillow Estimate/New Construction	\$252,494
November 2021 Zillow Estimate/New Construction Septic/Well Repairs	\$302,494
Average of Averages of Estimated Unit Cost to Rebuild	\$265,070
Add 15% Resilience	\$39,761
Average of Averages of Unit Cost to Rebuild Resiliently	\$304,831

7.4.1.2.1 SBA Average Verified Loss

This value was calculated using the average current value of verified loss for homeowners who were approved for an SBA loan as a result of the 2020 Wildfires.

After disasters, the SBA provides subsidized low-interest disaster loans to homeowners and renters. These loans can be used to repair or replace real estate and personal property impacted by the wildfires.

The SBA's loss verification is used to estimate and validate the cost of restoring disaster-damaged property to its pre-disaster condition. In the past, loss verifiers conducted damage assessments solely through on-site inspections. However, in 2017, the SBA implemented the desktop loss verification process. This process uses a two-step approach, an initial desktop loss verification and a post-desktop review. The initial desktop loss verification is used to estimate the cost of repairs. This is evaluated through telephonic interviews and third-party information sources (tax assessor's websites, Google Earth, and Zillow). After an initial desktop loss is calculated, a post-desktop review is conducted. For loans less than \$25,000, loss verifiers rely on a FEMA on-site inspection report. In the event that this was not conducted, the SBA conducts its own on-site inspection. For loans exceeding \$25,000, an SBA-conducted on-site inspection is required.

7.4.1.2.2 Affordable Multifamily Cost per Unit

The calculation for affordable multifamily cost per unit was provided by the Housing Authority of Jackson County (one of the eight impacted counties). These estimates come from four construction projects that the housing authority had completed in the past 4 years. Two of these projects occurred after the time of the disaster. Both multifamily housing projects started after the 2020 Wildfires saw increased per unit costs of 5% and 19%, respectively. Hard construction costs increased by 22% in 2021.

These project costs include land acquisition, construction, and soft costs per unit post-wildfire. Increased costs from the projects were attributed primarily to increases in land, labor, and construction material costs.

7.4.1.2.3 Manufactured Homes in Investor-Owned Manufactured Housing Parks with Site Improvements

The average cost of a manufactured home (MH) in an investor-owned manufactured housing park, including site improvements, is calculated from OHCS's Manufactured Home Replacement Program. The estimates provided are the average of single-wide and double-wide unit costs, plus site improvements. These costs do not include elevation costs. MH park owners who are bringing in new manufactured homes and homeowners involved in replacements note that increases in replacement MH costs, lack of inventory, timeline delays, and challenges in rebuilding park infrastructure have accounted for the lack of affordability and availability for impacted MH residents.

7.4.1.2.4 Manufactured and Modular Home Costs per Unit in Affordable Parks

The manufactured and modular home costs per unit in affordable parks are based on OHCS-funded projects that purchase and rebuild manufactured housing parks, provide prefabricated units, and preserve the parks as affordable. Based on current cap rates and market conditions, the development cost per space is estimated at between \$300,000 and \$350,000 (depending on the unit type), and includes land, infrastructure, capital improvements, and unit acquisition and installation.

7.4.1.2.5 November 2021 Zillow Estimate (New Construction)

The November 2021 Zillow estimates are a seasonally adjusted measure of typical home values across a given region and housing type. The Zillow estimates provide median home values at the county level. For this dataset, OHCS used the Zillow estimate and assumed that two-thirds of the actual home value is for the residential structure itself. With this data, OHCS then calculated a weighted average of home values in the impacted counties. Thus, taking 66% of the median home value from Zillow's \$382,567 average across the eight counties gives us a weighted home value of \$252,494.

This number also was validated through data that OHCS received from multiple homebuilders, who estimated the cost to build new single-family housing (3-bedroom/2-bath) in Oregon to range from \$220,000 to \$250,000. This did not include the cost of land acquisition or residential infrastructure.

7.4.1.2.6 November 2021 Zillow Cost Estimate with Septic/Well Repairs (New Construction)

This November 2021 Zillow cost estimate follows the same methodology as above but includes additional septic and well repairs. The Oregon DEQ estimates these additional costs to be around \$50,000 per residential unit. OHCS estimates that more than 1,100 damaged properties will need this type of repair. One additional component that most of the above datasets specifically excluded was site work—infrastructure in support of housing, landscaping, and other costs outside of the construction of the housing unit itself. Much of the impacted structures are located in rural areas without access to public utilities. As such, it is important for OHCS to include these home infrastructure-related costs for the installation of wells, septic, resilient landscaping, hardscaping for driveways, sidewalks, and other site improvements.

7.4.1.2.7 Resilient Construction Estimates

OHCS anticipated that all new reconstructed properties will integrate resilient building design and materials. Based on the HUD Federal Register Notice, the State anticipates at least a 15% cost increase from standards-based construction to resilient and mitigating construction.

7.4.2 Action Plan Amendment #2 — Substantial

7.4.2.1 Stick-Built Purchase Pricing

Real estate market data provided by Redfin, a technology-powered real estate company, was utilized and evaluated to determine an accurate and up-to-date pricing model with which to base the eventual purchase allowance. Data was controlled and refined to include only those homes that would generally comport with the size, type, and style of home that would meet the established standards. These data were controlled for elements such as location, lot size, home size, bedroom count, bathroom count, and listing year. Only those homes that were in one of the eight MID areas had a lot size of 10,000 square feet or less, structure size of 2,000 square feet or less, three bedrooms, one and a half baths or more, and were listed no earlier than 2022 (post-COVID) were used to calculate the square-footage multiplier that will yield the maximum purchase allowance. The intent was to identify a multiplier that could be used to modify the existing \$155 per square foot allowance for reconstruction and use the multiplier to calculate a more accurate market purchase allowance. The data was weighted through the number of listings within each MID area and the resulting multiplier was 1.7. This, when used to modify the original square foot allowance, yields a final maximum purchase allowance of \$316 per square foot.

For example, if the participant's original home was 1,000 square feet, they would be afforded \$316,000 to find a home to purchase. This value allows the participant to enter the real estate market and ultimately find and purchase a home comparable in size to their original home while also meeting the program's alternative site minimum standards, which are intended to ensure that the participant's home more closely agrees with energy efficiency and fire hardening requirements.

7.4.2.2 Manufactured Home Purchase Pricing

Similar to the stick-built purchase pricing, real estate market data provided by Redfin was used to identify both single-wide and double-wide unit costs for both traditional home purchase inclusive of the site and individual unit purchase where the participant leases the land only. The intent was to identify a factor that could be applied to the originally identified allowances of \$100,000 for a single-wide unit and \$185,000 for a double-wide unit, and that would result in a more accurate allowance for a participant to enter the market, identify a comparable unit to their original unit, and ultimately finalize the purchase. Two different factors identified represented the value needed to adjust the manufactured home allowance to allow for the applicant to either purchase a manufactured home inclusive of the site or to purchase the unit only where the participant didn't own their original land. During the evaluation, the data was controlled so that the listings inclusive of the site were separate from the listings which were not. In addition, an 11% land value was deducted from the listing value as an additional control in identifying the unit-only allowance.

The resulting multiplier for those inclusive of the site was identified as 1.44, and when used to modify the original allowances sees the single-wide allowance identified as \$172,800 and the double-wide allowance as \$319,680. The resulting multiplier for the unit-only allowance was 1.25 and when used to modify the original allowances, sees the single-wide allowance identified as \$150,000 and the double-wide allowance as \$277,500. Again, the data was controlled for elements that would allow the applicant to purchase a unit of similar size and amenity as the original unit while also more closely agreeing with the energy efficiency and fire hardening requirements.

7.4.2.3 Geographic Construction Multiplier for Rural Areas

Feedback from local partners and stakeholders revolved around higher construction costs for the more rural areas as the further outlying areas lack the services and labor to support construction, and a typical project will see materials and labor travelling in from the larger urban centers. This additional time and distance typically result in highly inflated costs as compared to a comparable project within one of the urban regions. This prompted an

additional look at price disparity between the established regional pricelists provided by the estimating platform (Xactimate) and real-world pricing in the further outlying areas or burn scars. The estimating platform pricelists exist for Eugene, Bend, Corvallis, Medford, Pendleton, Portland, Roseburg, and Salem. However, the accuracy of the pricing erodes the further away from these urban centers the project site is located. Because of this, a new approach was taken that identified the cost difference for new construction in these rural areas and contrasted them against the new construction cost in the known pricelist areas. Land value was controlled for in the amount of 11% so as to not let land value incorrectly skew the data in either direction. After evaluating the data, a factor of 1.49 was identified as that which could be applied to the estimating platform's pricelist to yield an amount more accurate to the rural area pricing. For example, a project within Eugene that costs \$10,000 will, on average, cost \$14,900 in the further outlying areas. Due to the fact that many of the burn scar areas are approximately one hour or more away from the urban centers/pricelist areas, this multiplier is necessary to see a participant successfully find a contractor to perform the work within the amount allowed for the project.

7.4.2.4 Reconstruction Multiplier

Similarly, the initial reconstruction multiplier of \$155 per square foot is found to be lower than the cost of actual new construction homes throughout the MID. New home construction pricing was evaluated, again through the use of Redfin market data, by identifying those listings that were for new construction and reducing the assumed contractor overhead, as well as land value, in order to yield a factor which could be applied against the \$155 to result in the direct construction cost. After evaluation, the resulting square foot multiplier that will allow the participant who qualifies for a reconstruction to acquire a contractor to perform the reconstruction is adjusted to a ceiling of \$277 per square foot. This ceiling incorporates the additional program design standards and expectations into the pricing. This includes fire hardening measures, resiliency measures, energy efficiency and green building standards, and other local, state, and/or program standards.

7.4.3 Data Sources Referenced in the Action Plan

- Associated General Contractors, Oregon-Columbia Chapter, Construction Workforce Shortages Reach Pre-Pandemic Levels (September 2021), <https://www.agc-oregon.org/uncategorized/construction-workforce-shortages-reach-pre-pandemic-levels-2/>
- CASA of Oregon, Manufactured Housing Cooperative Development, <https://casaoforegon.org/manufactured-housing/>

- Center for Emergency Management and Homeland Security, Spatial Hazard Events and Losses Database for the United States, <https://cemhs.asu.edu/sheldus>
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7.5 Important Definitions and Terms

Federally Used Acronyms

AMI: Area Median Income

CBDO: Community-Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant – Disaster Recovery

CFR: Code of Federal Regulations

DRGR: Disaster Recovery Grant Reporting System

DUA: Disaster Unemployment Assistance

FEMA: Federal Emergency Management Agency

HCDA: Housing and Community Development Act of 1974, as amended

HMGP: (FEMA) Hazard Mitigation Grant Program. This program provides funding to State, local, tribal, and territorial governments so that they can rebuild in a manner that reduces or mitigates future disaster losses in their communities.

IA: (FEMA) Individual Assistance

LEP: Limited English Proficiency

LIHTC: Low-Income Housing Tax Credit

LMI: Low-to-Moderate Income

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance. This program provides supplemental grants to State, tribal, territorial, and local governments, as well as certain types of private nonprofits so that communities can quickly respond to and recover from major disasters or emergencies.

RE: Responsible Entity

RFP: Request for Proposal

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

Underserved Communities: HUD defines “underserved communities” as populations sharing a particular characteristic, as well as geographic communities, which have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. Underserved communities that were economically distressed before the disaster include, but are not limited to, those areas that were designated as a Promise Zone, Opportunity Zone, Neighborhood Revitalization Strategy Area, tribal area, or those areas that meet at least one of the distress criteria established for the designation of an investment area of the Community Development Financial Institutions Fund at 12 CFR 1805.201(b)(3)(ii)(D).

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

Vulnerable Populations: HUD defines “vulnerable populations” as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources.

Oregon-Specific Acronyms

DEQ: Oregon Department of Environmental Quality

DLCD: Oregon Department of Land Conservation and Development

DOGAMI: Oregon Department of Geology and Mineral Industries

DR-4562: Oregon Wildfires and Straight-line Winds (incident period September 7, 2020 – November 3, 2020)

ETART: Erosion Threat Assessment and Reduction Team

HSC: Housing Stability Council

ODHS: Oregon Department of Human Services

OED: Oregon Employment Department

OEM: Oregon Office of Emergency Management

OHCS: Oregon Housing and Community Services

NHMP: Natural Hazards Mitigation Plan

RHNA: Regional Housing Needs Assessment