

Housing and Community Development Commission

2005

Cities of Portland and Gresham
Multnomah County

Fair Housing Plan

An Analysis of
Impediments and
Strategies to
Address Them



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EXECUTIVE SUMMARY

2005 Analysis of Impediments to Fair Housing for Multnomah County, the City of Portland and the City of Gresham

The Analysis of Impediments to Fair Housing (AI) is a review of barriers to fair housing in the public and private sector. Impediments to fair housing are defined as any actions, omissions, or decisions **taken because of** a person's membership in a protected class, which restricts housing choices or the availability of housing choices. Any actions, omissions, or decisions **which have the effect of** restricting housing choices or the availability of housing choices on the basis of a person's membership in a protected class are also considered impediments.

To develop this AI, the jurisdictions collected and analyzed a wide variety of information, including interviews with key stakeholders, testimony from members of protected classes and the general public, demographic data, and public policies that may have an impact on housing choice. The AI includes recommendations to address the impediments identified during the AI process.

Impediments

An impediment is defined in this AI as any violation of federal, state or local fair housing laws. The 2005 AI identified the following impediments:

1. Discrimination on the basis of mental or physical disability. Examples include failure to make reasonable accommodations and "no cause" eviction of tenants with disabilities. In addition, tenants do not have access to accessible units due to limited inventory and marketing of units.
2. Discrimination on the basis of race, color, and/or national origin. Examples include refusal to rent, subjecting tenants to different terms and conditions, and reduced access to homeownership.
3. Discrimination on the basis of familial status. Examples include refusal to rent, subjecting families to different terms and conditions, and "no cause" eviction of families who complain about unsafe or unhealthy conditions and/or assert their rights under federal, state, or local fair housing laws.
4. Discrimination on the basis of protected classes: age, gender, sexual orientation, marital status, religion, and/or source of income. While the number of reported complaints for these protected classes was small, these complaints suggest discrimination against members of these classes continue to occur.

Significant Issues

A significant issue is defined in this AI as a barrier that is beyond the reach of traditional fair housing law, but nonetheless restricts housing choice and contributes to the social and economic isolation of protected classes as well as low-income people. The 2005 AI identified the following significant issues:

1. The location of subsidized affordable housing and affordable housing in the general housing market limits the opportunity of lower income households to exercise meaningful housing choice.
2. Conversions of formerly affordable housing reduce options for low-income people and result in involuntary displacement and denial of housing choice.
3. Many units that lower income people can afford to rent are poor quality, unweatherized (leading to high heat bills), and/or present other conditions that pose a health hazard to the tenants.
4. Common screening criteria bar many from access to affordable housing, limiting housing choice.
5. The general unavailability of affordable housing units across the County continues to limit housing choice.
6. The composition of the Boards and Commissions that establish policies, make funding decisions, and oversee practices that relate to housing does not, with some exceptions, reflect the diversity of the community.

Recommendations to Address Impediments and Significant Issues

A number of recommendations were developed to address the identified impediments and significant issues. Key recommendations include:

1. The primary recommendation is for jurisdictions to continue to fund a range of core fair housing services, including but not limited to education and active enforcement of the fair housing laws.
2. The jurisdictions should continue to fund low-cost accessibility accommodations.
3. The City of Portland should implement the short-term strategies to close the minority homeownership gap as proposed by the HCDC Homeownership Advisory Committee (HOAC).
4. The City of Portland should continue to fund a range of proven programs that increase access to housing and encourage housing choice including Housing Connections, Ready to Rent, and Fresh Start.
5. Increase housing choice for tenants with disabilities by conducting an inventory of accessible units, evaluating the need for specific accessibility features in units, and developing recommendations to increase marketing of accessible units to disabled renters.
6. Develop a landlord-tenant issue workgroup to further explore and develop recommendations on issues cited in the AI, including use of “no cause” evictions for retaliatory purposes, habitability issues, under-reporting of fair housing complaints, and technical assistance on reasonable accommodation requests.
7. Research and explore the development of a new conversion ordinance to provide appropriate protections to low-income households.
8. The jurisdictions should consider implementing a uniform housing location policy across Multnomah County. The City of Portland should revisit its Location Policy, revising it if needed to ensure it strikes the appropriate balance between competing City housing goals.

All jurisdictions should increase efforts to recruit members of protected classes and economically diverse groups to serve on advisory bodies that oversee housing policies.

SECTION ONE: INTRODUCTION

FAIR HOUSING REQUIREMENTS

HUD's Consolidated Plan regulation (24 CFR 91) requires each state and local government who receives "entitlement funding" (CDBG, HOME, ESG, HOPWA) to submit a certification that it is affirmatively furthering fair housing ("AFFH"). This means that the jurisdiction must:

1. Conduct an analysis of impediments to fair housing choice;
2. Take appropriate actions to overcome the effects of impediments identified through that analysis; and,
3. Maintain records reflecting the analysis and actions.

The primary purpose of this report is to identify impediments to fair housing in Multnomah County based on race, color, religion, sex, disability, familial status, or national origin in violation of the Federal and state fair housing laws. Also, this report identifies impediments based on marital status, source of income, and sexual orientation, in violation of state and local laws. Finally, this report considers how a household's income affects its housing choice. Although Federal, state, and local law do not offer any protection against discrimination based on financial status, the impact of a household's income on its housing choice cannot be understated.

This report will also describe current efforts to address these impediments. This report will be updated following a community-based discussion to identify efforts where none currently exist, and to supplement existing efforts when they have proved insufficient to address the barrier.

Impediments are typically grouped into two classifications:

1. Intentional discrimination: actions, omissions, or decisions purposefully meant or designed to disadvantage members of a protected class.
2. Policies, practices, or procedures that appear neutral on their face, but have a disparate impact on members of a protected class.

SCOPE OF THE REQUIREMENT TO "AFFIRMATIVELY FURTHER FAIR HOUSING"

Recipients of federal housing-related funds are required to "affirmatively further fair housing." This requirement arises out of the language of the Fair Housing Act Amendments of 1988, mandating that all federally funded housing programs be administered "in a manner affirmatively to further" the policies of the Fair Housing Act.¹ The Second Circuit Court of Appeals (New York²) has held that this obligation requires local governments to pursue the goal of open integrated residential housing patterns, by acting to reverse the effects of racially segregated housing and avoid ghettoization of racial groups.³

¹ Section 42 USC 3608

² Oregon is under the jurisdiction of the Ninth Circuit Court of Appeals.

³ Otero v. New York Housing Authority, 484 F.2d 1122, 1134 (2nd Cir. 1973).

The courts have consistently held that cities receiving HUD funding must, at a minimum, use the federal funds they receive in a way that increases the supply of racially integrated housing.

THE POLICY OBJECTIVES UNDERLYING COMMUNITY DEVELOPMENT LAWS ARE SOMETIMES INCONSISTENT WITH EACH OTHER

The community development policy objective of de-concentrating housing opportunities for lower income people is often in tension with other policy objectives, such as revitalizing neighborhoods, avoiding involuntary displacement, maximizing housing choice, increasing the supply of affordable housing, and supporting self-determination of minority communities.

For example:

1. Jurisdictions have an obligation to address conditions of slum and blight. This neighborhood revitalization process seeks to empower neighborhood residents, repair dilapidated housing stock, energize the sagging housing market, and create wealth opportunities and jobs. To carry out these neighborhood revitalization goals, the City of Portland invests in new development and/or acquisition and rehabilitation of affordable rental housing. The City seeks to place these properties in nonprofit ownership, to ensure that they will remain affordable and available to low-income people even if the neighborhood gentrifies. The City typically funds local community-based nonprofit development organizations (CBDOs) with low-income representation on their boards and the mission of providing safe, decent and affordable housing. There is a clear tension between de-concentrating poverty and improving the affordable housing stock in neighborhoods that have suffered from long-term disinvestment.
2. The housing market in close-in neighborhoods has experienced rapid price escalation over the past 10 years, commonly described as “gentrification.” The causes of economic gentrification are complex, and are beyond the scope of this report. Public investment is a minor factor in the heated housing market of Portland. Economic gentrification has the result of pushing lower income residents out of the city core neighborhoods and into suburbs that ring the city. The choice to move is often based on the affordability of housing. The ramifications of such displacement are many fold: the household is separated from family, friends, religious institutions, and supportive networks; the adults may face a longer commute to work; and the education of the children is disrupted as a result of transferring schools. For minority low-income households, the impact of a move may be exaggerated by the lack of culturally competent services in the suburbs. The effect of gentrification is de-concentration of poverty, but often at the expense of the choices of lower income people.

3. The process of obtaining financing for affordable housing development encourages development in low-cost neighborhoods. There are two interrelated dynamics that lead to this result: the developers need to leverage other resources, and the funders' desire to stretch the scarce financial resource.

First, because very few affordable housing developments are funded from one source, most projects have to compete for funding with other projects. One criterion potential funders often use to evaluate projects is the "cost per unit." Projects with lower unit costs are more competitive. Therefore, project development teams seek to keep costs low. Because land cost is an "elastic" cost to the development equation, development teams seek to pay as few dollars as possible for land. The less expensive parcels of property to develop are often located in distressed and/or emerging neighborhoods.

Public funders are not willing to give up the "cost per unit" analysis even though it tends to concentrate development of affordable housing in neighborhoods that are already low-income, because it allows them to stretch the public dollar over the maximum number of units. It also allows public entities to claim a high leverage ratio for public money. This may help local governments convince taxpayers to approve new funding for affordable housing development.

For the purpose of this analysis, the fundamental questions are:

1. Do all residents and potential residents of Multnomah County have equal access to housing?
2. If not, what are the impediments and other issues that restrict equal access to housing?

¹⁰ All data based on an analysis of Feb. 2005 subsidized rental housing data from online HUD data sources: (1) Residential Tenant Characteristics System and (2) Multifamily Assisted Housing Database: MF Assistance and Section 8 Contract Database; <http://pic.hud.gov/pic/RCRPublic/rcrmain.asp>; <http://www.hud.gov/offices/hsg/mfh/exp/mfhdiscl.cfm>

THE CONTEXT OF THE STUDY

Three major factors provide context for this study. The first is the boom in the Portland area housing market, marked by sharp increases in housing prices. Fallout from the boom includes the loss of many units of family size rental housing, as owners sell off single-family rentals or convert multi-family rental buildings to condominiums. Although rents have not risen as fast as home prices, rents are at a level above what low-income households can pay. Housing costs have increased at a faster rate in older close-in neighborhoods than citywide, resulting in the displacement of many residents to the suburbs.

The second factor is the state budget crisis, attributable to many factors, chief among them the economic recession that has lingered in Oregon since 2000, the Federal policy of shifting important safety net programs to the state without adequate funding, and Oregon's peculiar tax structure. Oregon has no sales tax, and is very reliant on income and property taxes. However, a series of Oregon Ballot Measures have sharply reduced the share of income and property taxes paid by business, and have limited the property taxes that may be imposed on homeowners. Declining state revenues have resulted in reductions in state support for low-income housing programs, and for service programs that are necessary to allow low-income people generally, and protected class members in particular, to succeed in housing. These include cuts at the State and County level to mental health, addiction treatment, gang prevention, after school, food security, job placement and training, and educational support programs. Most notable among these is the collapse of Oregon Health Plan:

- It has pushed low-income families without health coverage to more expensive forms of health care (e.g. emergency room care), forcing families to choose between purchasing medical care and paying rent.
- Families who seek to resolve this dilemma by using credit are likely, over time, to experience credit problems. Many property owners will not rent to households with poor credit reports.
- When people cannot afford necessary medical care and medication, they become sicker. Individuals with mental illness and/or substance abuse issues may develop behavioral problems leading to loss of housing, deterioration in family relationships, and in some cases, incarceration, with consequent costs and losses to society.

The third factor is the deterioration of federal support for the Section 8 program. Beginning in late 2004, HUD moved to sharply restrict the availability of Section 8 housing vouchers, and proposed cutting between \$1 and \$2 billion from the Section 8 program starting in 2005. HUD selected a reimbursement rate that was below the cost of providing a voucher, putting tremendous financial pressure on the local housing authority. These cuts hit hardest in western states like Oregon that do not have as much public housing and are more dependent on the rent subsidies available through the voucher program than old East Coast cities. Nationally, 13% of all renter households receive a HUD rent subsidy, while in Oregon only 9% do, a difference of 26%. In Oregon, 64% of HUD rent subsidies are in the form of Section 8 vouchers, while the national average is 45%, a huge 42% difference¹⁰. These cuts also are most dangerous to housing authorities that serve the poorest households and cannot recoup cuts through rent increases. The Housing Authority of Portland issues more than 90% of vouchers to households with incomes that do not exceed 30% MFI.

HOW THE ANALYSIS WAS CONDUCTED

We collected census and other data in order to augment the data presented in the County's initial Analysis of Impediments, and the housing market analysis of *the 2005-2010 Consolidated Plan*. We conducted 50 interviews with local and regional planners, housing advocates, housing industry representatives, care providers, housing providers,

fair housing regulators, and county housing officials.¹¹ We gleaned information from conferences and trainings on fair housing and related topics. We collected and reviewed written materials on fair housing issues and programs, regional and local demographics, transportation, and local planning, including local Comprehensive Plans (Goal 10 and other land use elements). We consulted various federal, state and local statutes and ordinances (and the literature around them).

With assistance from the Portland State University Population Center, we developed a series of 73 maps that allowed us to perform spatial analysis of demographic trends, environmental health issues, and the location and availability of affordable housing.

We hired Fisher, Sheehan and Colton, a firm of consulting economists, with a background in low-income issues, public programs, and land use planning, to perform the analysis, draft impediments and document findings, and make recommendations. Dr. Michael F. Sheehan and Roger Colton conducted much of the analysis, while members of a technical review committee provided oversight and supplemental evaluation.

We formed two stakeholder committees for processing the analysis. An “advisory committee” including fair housing advocates, tenant rights groups, people with and advocates for people with physical disabilities, people representing different ethnic/cultural communities reviewed the scope of the analysis, discussed initial findings, and statements of impediments, and suggested recommendations.

A “technical review committee” including technical fair housing practitioners and housing program staff reviewed the scope of the analysis, secured data sources, supplemented the initial analysis, and discussed the accuracy and organization of the initial findings, statements of impediments, and suggested recommendations.

The Housing and Community Development Commission (HCDC) provided opportunities for public review and comment on drafts of the analysis. Individual HCDC members also served on the Analysis of Impediments Advisory Committee and provided comments and review of initial findings, statements of impediments, and suggested recommendations.

¹¹ A list of interviewees is provided in Appendix II.

¹⁴ H.R. Rep. No. 711, 100th Cong., 2d Sess. 22, at 25 (1988).

SECTION TWO: REVIEW OF THE FAIR HOUSING ACT, RELATED STATUTES, RULES AND LOCAL

THE FAIR HOUSING ACT

The Fair Housing Act of 1968, 42 USC 3610, *et seq.*, as amended in substantial part in 1988, is a legislative enactment enforcing, with exceptions, a policy of equal access to all types of housing for classes of persons within its protection. To this end, the Act prohibits not only purposeful, intentional discrimination, but also practices that, applied equally to all without any intent to discriminate, have the practical effect of discriminating against groups protected by the Act.

The Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, familial status, or national origin. In addition, the Act bans discrimination based on disability. Relevant issues with the two more recent additions to the FHA --disability status and familial status-- are discussed below.

1. THE FAIR HOUSING ACT AMENDMENTS AND DISABILITIES

The Fair Housing Act, as it applies to persons with disabilities, is intended to accomplish three purposes:

- to end segregation of housing available to people with disabilities;
- to give people with disabilities the right to choose where they wish to live; and
- to require reasonable accommodation to their needs in securing and enjoying appropriate housing.

The Act requires “that changes be made to such traditional rules or practices if necessary to permit a person with handicaps an equal opportunity to use and enjoy a dwelling.”¹⁴ The House Report states further that “to the extent that terms, conditions, privileges, services or facilities operate to discriminate against a person because of a handicap, elimination of the discrimination would be required in order to comply with the requirements of this subsection. ”Under the Fair Housing Act, "handicapped" means:

- a physical or mental impairment which substantially limits one or more of such person's major life activities;
- a record of having such an impairment; or
- being regarded as having such an impairment. This term does not include current, illegal use of or addiction to a controlled substance.

2. THE FAIR HOUSING ACT AMENDMENTS AND FAMILIAL STATUS

Until the Fair Housing Act Amendments of 1988 took effect, no federal statute provided comprehensive protection to families with children when those families suffered discrimination in housing. While some constitutional law had developed protecting familial status under a right to privacy theory, this was of limited help to the families because some evidence of "state action" – action by the government -- is required to support a challenge under constitutional law. Real estate and rental transactions are typically conducted between purely private parties, without government involvement, and are therefore beyond each of constitutional law.

The Fair Housing Act prohibition of discrimination based on "familial status" protects households that include one or more children under 18, and that child's parent, guardian, or other person with custody as a result of the written permission of the parent or guardian. The definition is broad and encompasses most extended family relationships. Pregnant women are also protected, as well as persons who are seeking to obtain legal custody of a child under age 18.

While the Federal Fair Housing Act does not prohibit discrimination based on marital status, it clearly prohibits discrimination against single parents, divorced custodial parents, or those who have a child born out of wedlock.

3. PROVISION OF SERVICES "IN CONNECTION WITH" HOUSING

The federal Fair Housing Act applies not only to owners of residential housing, real estate agents, and banks, but also to any entity that provides "services or facilities in connection with the sale or rental of a dwelling".¹⁵ The Department of Housing and Urban Development (HUD) regulations explain that the reach of these provisions includes "any conduct relating to the provision of services and facilities in connection [with housing] that otherwise makes unavailable or denies dwellings to persons."¹⁶ This includes "refusing to provide municipal services or providing such services . . . discriminatorily".¹⁷

¹⁵ 42 USC 3604(a) and (b), (f)(1) and (2).

¹⁶ 24 CFR 100.70(b) (1996).

¹⁷ 24 CFR 100.70(d)(4) (1996).

4. EXEMPTIONS

The Act itself exempts from liability certain transactions: for example, and with certain limitations, sales of single family homes by owners, and rental of units in an owner occupied building containing four or fewer units.¹⁸

5. THE BUSINESS NECESSITY DEFENSE

A defendant in a civil rights case will often raise the defense of business necessity. In order words, if the defendants had not adopted a policy or practice of discriminating, its business would have suffered greatly. Generally, this defense is not accepted in fair housing cases, particularly if the defendant is a government entity.¹⁹ At a minimum, one who asserts the business necessity defense must prove both that the policy was compelled by a legitimate business necessity and that no less discriminatory alternative to the policy was available.

6. ADA AND THE FEDERAL REHABILITATION ACT

Both the Americans With Disabilities Act of 1990 (42 USC 12132) and the Rehabilitation Act ("504") (29 USC 794) provide affirmative rights and offer legal protection against discrimination for Americans with disabilities.

The Rehabilitation Act prohibits discrimination on the basis of handicap by any "program or activity" receiving federal funds.²⁰

The ADA, on the other hand, is more sweeping. Title II of the Act prohibits discrimination on the basis of disability by public entities in their programs and activities, including housing programs, and establishes a right to reasonable accommodation. Title III prohibits discrimination on the basis of disability in the full and equal enjoyment of goods, services, facilities, privileges, advantages, or accommodation of any place of accommodation. This section applies to public entities whether or not they receive federal funds, as well as all commercial facilities offering public accommodations.²¹

¹⁸ 42 USC 3603(b).

¹⁹ McCormack, "Business Necessity in Title VIII: Employment Discrimination Doctrine Into the Fair Housing Act," JF Fordham L. Rev. 563, 580 (1986).

²⁰ Regulations are found at 24 CFR Part 8.

²¹ ADA regulations are found at 28 CFR 12132.

OREGON DLCD RULES: GOAL 10²²

Oregon's land use regulatory system requires all Oregon's counties and cities to plan for the provision of adequate lands to meet the demand for housing at all income levels.

2. Plans should be developed in a manner than insures the provision of appropriate types and amounts of land within urban growth boundaries. Such land should be necessary and suitable for housing that meets the housing needs of households of all income levels.

This requirement is supported by the requirement that the jurisdiction should:

Take into account the effects of utilizing financial incentives and resources to (a) stimulate the rehabilitation of substandard housing without regard to the financial capacity of the owner so long as benefits accrue to the occupants; and (b) bring into compliance with codes adopted to assure safe and sanitary housing the dwellings of individuals who cannot on their own afford to meet such codes.

Goal 10 also sets forth under "B. Implementation," the requirement that each jurisdiction should implement a variety of measures to ensure the dispersal of low income housing throughout the planning area:

5. Additional methods and devices for achieving the goal should, after consideration of the impact on lower income households, include, but not be limited to: (1) tax incentives and disincentives; (2) building and construction code revisions; (3) zoning and land use controls; (4) subsidies and loans; (5) fee and less-than-fee acquisition techniques; (6) enforcement of local health and safety codes; and (7) coordination of the development of urban facilities and services to disperse low-income housing throughout the planning area.²³

In sum, Goal 10 requires cities and counties as part of their land use planning responsibilities to plan for housing for all income levels within the jurisdiction, and to use the whole variety of local planning and public finance devices to ensure that adequate and dispersed low-income housing is provided.

²² OAR 660-015-0000(10).

²³ Idip

METRO'S REGIONAL AFFORDABLE HOUSING STRATEGY (RAHS)

To implement Goal 10, in 2001, Metro amended Title VII of its Regional Plan to include the Regional Affordable Housing Strategy (RAHS), a set of voluntary goals for development of new affordable housing in each of Metro's member jurisdictions.

The RAHS explains why a regional planning approach to affordable housing is justified:

People may live in one part, work in another and shop in yet another part of the region. In many areas of the region there are few affordable housing options for the people who work there. This means that workers must drive from other parts of the region, using time and scarce resources while increasing congestion and pollution.²⁴

The RAHS identifies the people who need affordable housing most:

Sometimes the region suffers from a misunderstanding of who needs affordable housing. The shortage of housing affects a wide variety of residents in our region particularly families or households earning 50% (\$26,850) or less of the region's annual median household income (MHI). Examples of households that fall into this category include a case manager at a nonprofit public defender's office, special education teacher, cashier for a department store, dental assistant, school bus driver, hair dresser, pharmacy assistant and many retired persons.²⁵

Those that make less than 30% of MHI include fast food workers, service station attendants and many pre-school teachers, for example.²⁶

The key provisions of Title VII are the Affordable Housing Production Goals: Each city and county within the Metro region should adopt the Affordable Housing Production Goal indicated in Table 3.07-7 for their city or county as a guide to measure toward meeting the affordable housing needs of households with incomes between 0% and 50% of the regional median family income. Section 3.07.720.

Section 3.07.730(A)(3) requires all jurisdictions to: Include plan policies, actions, and implementation measures aimed at increasing opportunities for households of all income levels to live within their individual jurisdictions in affordable housing.

²⁴ Metro, Regional Affordable Housing Strategy, p.1 (June 22, 2000).

²⁵ Id at p.2.

²⁶ Id at 10.

For the period 2001-2006 Metro set forth a table with “Production Goals” per jurisdiction. These goals are consistent with the standards set forth in HUD rules requiring local jurisdictions to “affirmatively further fair housing,” and the DLCDC Goal 10 rules discussed above. For the Metro jurisdictions the goals were as set forth in Table 1 for the period 2001-06:

TABLE 1: MULTNOMAH COUNTY JURISDICTIONS FIVE YEAR VOLUNTARY AFFORDABLE HOUSING PRODUCTION GOALS			
Jurisdiction	Housing for <30%	Housing for 30-50%	Total
Beaverton	427	229	655
Cornelius	40	10	50
Durham	6	4	9
Fairview	42	31	73
Forest Grove	55	10	64
Gladstone	43	10	53
Gresham	454	102	557
Happy Valley	29	28	57
Hillsboro	302	211	514
John City	0	00	00
King City	5	0	5
Lake Oswego	185	154	338
Maywood Park	0	0	0
Milwaukie	102	0	102
Oregon City	123	35	158
Portland	1791	0	1791
Rivergrove	1	1	3
Sherwood	67	56	123
Tigard	216	103	320
Troutdale	75	56	131
Tualatin	120	69	190
West Linn	98	71	170
Wilsonville	100	80	179
Wood Village	16	1	17
Clackamas County Uninc	729	374	1103
Multnomah County Uninc	81	53	135
Washington Co Uninc	1312	940	2253
Totals	6420	2628	9048
Source: Metro, Regional Affordable Housing Strategy, June 2000			

PORTLAND AND MULTNOMAH COUNTY ANTI-DISCRIMINATION ORDINANCES

Both Portland and Multnomah County have ordinances that outlaw discrimination in housing against a broader set of protected classes than Federal law. Both the Portland ordinance (City Code 23-01-060) and the Multnomah County ordinance (No. 969) prohibit discrimination in selling, renting or leasing real property on the basis of race, religion, color, sex, national origin, marital status, familial status, disability, sexual orientation, source of income, or age (if 18 or older). Both ordinances carve out an exception that permits landlords to refuse to rent to federal rent subsidy (Section 8) recipients.

Local fair housing laws may be enforced through a complaint to the Bureau of Labor and Industries.

OREGON STATE ANTI-DISCRIMINATION STATUTES

Oregon law parallels federal law, but also bars discrimination based on marital status and source of income (except for Section 8). See ORS 659A.421(1). It specifically bars discrimination in real estate listings or advertising.

(ORS 659A.424(2) strengthens these provisions in cases involving rental properties by expressly prohibiting practices which have a disparate impact even in cases where an explicit intent to discriminate cannot be proven.

A claim of discrimination against transgender persons is usually asserted under the provision of civil rights laws that protects persons with a disability or perceived disability. Oregon law goes a step further, providing some level of explicit protection to transgender persons. In Oregon, OAR 839-006-0206 provides that, while there is no duty to make reasonable accommodation to an individual based on his/her gender identity in employment settings, the individual is otherwise protected from discrimination. While there is, at present, no analogous regulation pertaining to housing discrimination, courts hearing housing discrimination cases tend to follow policies and precedents initially developed in the employment discrimination context. For example, cases finding sexual harassment of a tenant by a landlord actionable under the Fair Housing Act relied heavily on cases finding sexual harassment in employment actionable under Title VII.

The State Fair Housing Law may be enforced either by a complaint to the Commissioner of the Bureau of Labor and Industries or through a civil complaint pursuant to ORS 659A.870.

SECTION THREE: BACKGROUND DATA

INTRODUCTION

This section provides data and analysis to identify fair housing impediments and issues. Some of the analysis was performed by reviewing a number of maps specifically generated for the AI (Appendix XV).

Data was collected on a variety of issues. These include the following:

- Complaint data reported by fair housing advocacy and legal agencies
- Basic demographics
- The distribution of poverty in the region
- The location of housing, toxic sites, and minority populations
- The demographics and geography of renters and owners
- The distribution of public and affordable housing by census tracts
- The distribution of section 8 housing vouchers by location
- The spatial distribution of cost burdened households in the region
- The spatial distribution of housing with housing unit problems
- Housing characteristics by census tract
- The location of infrastructure in Multnomah County
- The spatial demographics of mobile homes in the County
- Elementary school attendance areas and elementary school performance data by protected class
- The spatial distribution of elderly homeowners and renters
- Crime data by neighborhood
- Job locations by census tract

In addition to demographic data the appendices also provide data on such issues as Portland's location policy, the impact of poverty and neighborhood on domestic violence, and the large number of interviews conducted for this study.

The geographic focus of this data and analysis is for Multnomah County.

THE PROTECTED CLASSES

Multnomah County is home to substantial communities of protected class members (see definitions in Section II). Various data tables provided in this analysis demonstrate the demographic make up of the community, and a number of maps (Appendix XV) show how the demographics are distributed across the county.

Tables 2 and 3 present a breakdown of Multnomah County and the cities in the county by race and ethnicity with percentages.²⁷ Table 4 shows the white population in poverty broken down by age. Tables 5, 6, 7, 8 and 9 provide the analogous data for African

²⁷ Note that Map 46 in Appendix XV shows the location of census tracts.

Americans, Native Americans, Asians, Hawaiians and Pacific Islanders and Hispanics. Table 11 provides a breakdown of renters in city subsidized housing by location and by race and ethnicity.

A primary indicator of possible fair housing violations against protected classes is the number of complaints registered with advocacy groups. Studies conducted at the State level suggest that only about 22% of the people who may experience housing discrimination actually report their experiences²⁸.

Nevertheless, Table 1a shows the protected class basis of fair housing complaints reported by the Fair Housing Council of Oregon, Legal Aid Services of Oregon, and HUD, for Multnomah County.

TABLE 1A: PROTECTED CLASS ON THE BASIS OF FAIR HOUSING COMPLAINTS

Multnomah County							
Protected Class:	Fair Housing Council of Oregon: 7/04 - 7/05	Legal Aid Services of Oregon: 7/04-7/05	HUD: 1-97-1/02	Total	%	Possible Duplication Bet. FHCO & LASO	% Possible Duplication Bet. FHCO & LASO
Disability	45	75	65	185	100%	3	3%
• design/construction	41	0	0	41	22%	0	0%
• eviction	1	38	0	39	21%	1	3%
• failure to permit reasonable modification	0	0	1	1	1%	0	0%
• harassment	1	0	6	7	4%	0	0%
• reasonable accommodation	0	28	27	55	30%	0	0%
• refusal to rent	2	2	6	10	5%	2	50%
• refusal to sell	0	0	1	1	1%	0	0%
• terms and conditions	0	7	24	31	17%	0	0%
Familial Status	6	9	41	56	100%	4	27%
• discriminatory advertisement - rental	0	0	5	5	9%	0	0%
• eviction	0	4	0	4	7%	0	0%
• harassment	2	0	0	2	4%	0	0%
• refusal to rent	4	4	16	24	43%	4	50%
• terms and conditions	0	1	20	21	38%	0	0%
Race	25	12	55	92	100%	6	16%
• discriminatory advertising	0	0	2	2	2%	0	0%

²⁸ State of Oregon Five-Year Strategic Plan and Fair Housing Action Plan, Page 3

³¹ Defined as tracts with 51% or more of households at or below 80% of median income.

• eviction	1	5	0	6	7%	1	17%
• harassment	3	0	12	15	16%	0	0%
• refusal to insure	10	0	0	10	11%	0	0%
• refusal to loan	1	0	1	2	2%	0	0%
• refusal to rent	9	4	12	25	27%	4	31%
• terms and conditions	1	3	28	32	35%	1	25%
Age							
Age	2	1	0	3	100%	0	0%
• eviction	0	1	0	1	33%	0	0%
• harassment	1	0	0	1	33%	0	0%
• refusal to rent	1	0	0	1	33%	0	0%
National Origin							
National Origin	5	4	12	21	100%	3	33%
• eviction	1	1	0	2	10%	1	100%
• harassment	1	0	2	3	14%	0	0%
• reasonable accommodation	0	1		1	5%	0	0%
• refusal to rent	1	0	4	5	24%	0	0%
• terms and conditions	2	2	6	10	48%	2	100%
Sex							
Sex	1	14	9	24	100%	0	0%
• eviction	0	5	0	5	21%	0	0%
• other	0	5	0	5	21%	0	0%
• refusal to rent	1	0	1	2	8%	0	0%
• terms and conditions	0	4	8	12	50%	0	0%
Sexual Orientation							
Sexual Orientation	1	3	0	4	100%	1	33%
• eviction	0	1	0	1	25%	0	0%
• refusal to rent	1	2	0	3	75%	1	33%
Marital Status							
Marital Status	2	1	0	3	100%	1	50%
• refusal to rent	2	1	0	3	100%	1	50%
Religion							
Religion	0	1	1	2	100%	0	0%
• terms and conditions	0	1	1	2	100%	0	0%
Source of Income							
Source of Income	0	2	0	2	100%	0	0%
• refusal to rent	0	1	0	1	50%	0	0%
• terms and conditions	0	1	0	1	50%	0	0%
TOTAL	87	122	183	392		18	9%

Note: This data does not include the number of cases where a fair housing violation was actually determined. This data represents the number of "suspected" or "possible" fair housing violations based on protected class.

The most frequently reported cases were against people with physical disabilities. Of these cases, “reasonable accommodation” and issues of building or unit design were of most concern.

The second most frequently reported cases were against race/ethnicity. Of these cases, “terms and conditions” and “refusal to rent” were of most concern.

The third most frequently reported cases were against familial status. Of these cases, “terms and conditions” and “refusal to rent” were also of most concern.

The fourth and fifth most frequently reported cases were against Sex (Gender) and National Origin, respectively, with “terms and conditions” and “refusal to rent” as the most concern.

Other protected classes including Age, Religion, Sexual Orientation, Marital Status, and Source of Income were the least reported cases.

Based on trends and estimates from state that only 22% of possible cases are reported, the 87 cases reported by the Fair Housing Council of Oregon represent some 220 other similar cases that went un-reported. The 122 cases reported by Legal Aid Services of Oregon represent some 310 other similar cases that went un-reported.

AREA DEMOGRAPHICS

The following tables show various demographics across Multnomah County, as recorded in the 2000 Census.

TABLE 2: MULTNOMAH COUNTY AND JURISDICTIONS: POPULATION BY RACE AND ETHNICITY

Jurisdiction	White Not Hispanic	African American	Hispanic	Native American	Asian American	Hawaiian & Pacific Is	Two or More Races	Total
Portland	389,877	32,561	34,664	5,219	33,055	1,943	23,250	520,569
Fairview	5,538	189	1,266	55	233	31	380	7,692
Gresham	69,394	1,595	10,907	820	2,518	339	4,499	90,072
Maywood Park	683	27	16	4	9	-	39	778
Troutdale	11,514	66	511	213	465	103	464	13,336
Wood Village	2,001	6	341	50	147	-	160	2,705
Multnomah Co.	494,284	34,527	48,073	6,463	36,622	2,444	29,082	651,495

Source: U.S. Census Bureau, Census 2000

TABLE 3: MULTNOMAH COUNTY AND JURISDICTIONS: POPULATION PERCENTAGES BY RACE AND ETHNICITY

Jurisdiction	White Not Hispanic	African American	Hispanic	Native American	Asian American	Hawaiian & Pacific Is	Two or More Races	Total
Portland	75%	6%	7%	1%	6%	0%	4%	100%
Fairview	72%	2%	16%	1%	3%	0%	5%	100%
Gresham	77%	2%	12%	1%	3%	0%	5%	100%
Maywood Park	88%	3%	2%	1%	1%	0%	5%	100%
Troutdale	86%	0%	4%	2%	3%	1%	3%	100%
Wood Village	74%	0%	13%	2%	5%	0%	6%	100%
Multnomah Co.	76%	5%	7%	1%	6%	0%	4%	100%

Source: U.S. Census Bureau, Census 2000

TABLE 4: POVERTY STATUS IN 1999 BY AGE: WHITE ALONE POPULATION FOR WHOM POVERTY STATUS IS DETERMINED, MULTNOMAH COUNTY JURISDICTIONS

Item	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah Co
Total:	5,713	72,681	689	401,875	11,721	2,128	510,278
Income in 1999 below poverty level:	782	6,932	11	43,614	546	122	52,688
Under 5 years,	65	935	0	2,526	46	10	3,579
5 years,	0	147	0	526	0	0	682
6 to 11 years,	137	762	0	3,228	18	24	4,206
12 to 17 years,	70	576	0	2,786	109	0	3,631
18 to 64 years,	436	4,002	9	29,717	352	82	35,039
65 to 74 years,	30	241	0	2,023	8	6	2,348
75 years and over,	44	269	2	2,808	13	0	3,203
Income in 1999 at or above poverty level:,	4,931	65,749	678	358,261	11,175	2,006	457,590
Under 5 years,	378	4,038	30	17,590	945	60	23,648
5 years,	100	890	6	3,307	119	4	4,511
6 to 11 years,	455	5,417	36	21,615	1,121	172	30,100
12 to 17 years,	291	5,347	42	21,052	992	184	29,356
18 to 64 years,	3,200	42,746	448	247,316	7,506	1,384	312,062
65 to 74 years,	278	3,576	53	22,183	284	115	27,457
75 years and over,	229	3,735	63	25,198	208	87	30,456

Source: U.S. Census Bureau, Census 2000

**TABLE 5: POVERTY STATUS IN 1999 BY AGE
BLACK OR AFRICAN AMERICAN ALONE POPULATION FOR WHOM POVERTY STATUS IS DETERMINED**

Item	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah Co.
Total:	189	1,595	27	32,561	66	6	34,527
Income in 1999 below poverty level:	73	471	2	8,434	5	6	9,006
Under 5 years	14	95	0	976	0	0	1,085
5 years	4	11	0	139	0	0	154
6 to 11 years,	17	47	0	1,328	0	0	1,392
12 to 17 years,	14	60	0	984	0	0	1,066
18 to 64 years,	24	241	2	4,409	5	6	4,687
65 to 74 years,	0	0	0	334	0	0	334
75 years and over,	0	17	0	264	0	0	288
Income in 1999 at or above poverty level:,	116	1,124	25	24,127	61	0	25,521
Under 5 years,	6	121	4	1,668	0	0	1,799
5 years,	0	23	0	374	0	0	397
6 to 11 years,	11	168	0	2,475	6	0	2,669
12 to 17 years,	15	67	4	2,315	17	0	2,422
18 to 64 years,	84	721	17	15,210	38	0	16,109
65 to 74 years,	0	9	0	1,272	0	0	1,291
75 years and over,	0	15	0	813	0	0	834

Source: U.S. Census Bureau, Census 2000

**TABLE 6: POVERTY STATUS IN 1999 BY AGE: UNIVERSE
AMERICAN INDIAN AND ALASKA NATIVE ALONE POPULATION FOR WHOM POVERTY STATUS IS DETERMINED**

Item	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah Co
Total:	55	820	4	5,219	213	50	6,463
Income in 1999 below poverty level:	0	194	0	1,190	0	15	1,427
Under 5 years,	0	4	0	84	0	0	88
5 years,	0	7	0	7	0	0	14
6 to 11 years,	0	6	0	138	0	0	144
12 to 17 years,	0	34	0	80	0	0	117
18 to 64 years,	0	143	0	859	0	15	1,042
65 to 74 years,	0	0	0	22	0	0	22
75 years and over,	0	0	0	0	0	0	0
Income in 1999 at or above poverty level:	55	626	4	4,029	213	35	5,036
Under 5 years,	0	31	0	203	46	0	280
5 years,	0	8	0	68	0	0	76
6 to 11 years,	0	16	2	336	13	18	406
12 to 17 years,	8	28	0	343	35	0	420
18 to 64 years,	47	500	2	2,911	119	17	3,641
65 to 74 years,	0	34	0	103	0	0	139
75 years and over,	0	9	0	65	0	0	74

Source: U.S. Census Bureau, Census 2000

TABLE 7: POVERTY STATUS IN 1999 BY AGE: UNIVERSE: ASIAN ALONE POPULATION FOR WHOM POVERTY STATUS IS DETERMINED								
Item	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah Co	
Total:	233	2,518		9	33,055	465	147	36,622
Income in 1999 below poverty level:,	29	217		0	4,363	8	0	4,597
Under 5 years,	0	8		0	311	0	0	319
5 years,	0	22		0	63	0	0	85
6 to 11 years,	0	15		0	442	0	0	451
12 to 17 years,	0	24		0	374	0	0	398
18 to 64 years,	29	144		0	2,681	8	0	2,848
65 to 74 years,	0	0		0	308	0	0	308
75 years and over,	0	4		0	184	0	0	188
Income in 1999 at or above poverty level:,	204	2,301		9	28,692	457	147	32,025
Under 5 years,	12	175		0	2,231	53	0	2,493
5 years,	0	0		0	466	28	0	501
6 to 11 years,	7	177		6	2,189	25	25	2,437
12 to 17 years,	17	264		0	2,064	26	38	2,430
18 to 64 years,	168	1,503		3	19,569	310	84	21,759
65 to 74 years,	0	149		0	1,363	15	0	1,548
75 years and over,	0	33		0	810	0	0	857
U.S. Census Bureau, Census 2000								

TABLE 8: POVERTY STATUS IN 1999 BY AGE: UNIVERSE: NATIVE HAWAIIAN AND OTHER PACIFIC ISLANDER ALONE POPULATION FOR WHOM POVERTY STATUS IS DETERMINED

Item	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah Co
Total:	31	339	0	1,943	103	0	2,444
Income in 1999 below poverty level:,	0	21	0	286	24	0	339
Under 5 years,	0	0	0	37	0	0	37
5 years,	0	0	0	19	0	0	19
6 to 11 years,	0	0	0	37	8	0	45
12 to 17 years,	0	4	0	19	0	0	23
18 to 64 years,	0	17	0	174	16	0	215
65 to 74 years,	0	0	0	0	0	0	0
75 years and over,	0	0	0	0	0	0	0
Income in 1999 at or above poverty level:,	31	318	0	1,657	79	0	2,105
Under 5 years,	0	44	0	62	8	0	114
5 years,	4	0	0	24	0	0	28
6 to 11 years,	5	0	0	287	0	0	303
12 to 17 years,	9	61	0	136	7	0	213
18 to 64 years,	13	193	0	1,118	49	0	1,382
65 to 74 years,	0	20	0	30	7	0	57
75 years and over,	0	0	0	0	8	0	8

U.S. Census Bureau, Census 2000

**TABLE 9: POVERTY STATUS IN 1999 BY AGE: UNIVERSE
HISPANIC OR LATINO POPULATION FOR WHOM POVERTY STATUS IS DETERMINED**

Item	Multnomah Co.	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village
Total	48,073	1,266	10,907	16	34,664	511	341
Income in 1999 below poverty level:,	12,465	555	3,309	0	8,366	58	59
Under 5 years,	1,975	68	570	0	1,312	7	15
5 years,	283	0	65	0	218	0	0
6 to 11 years,	1,575	115	523	0	932	2	0
12 to 17 years,	1,104	35	255	0	796	8	0
18 to 64 years,	7,381	325	1,866	0	5,003	41	44
65 to 74 years,	73	0	30	0	43	0	0
75 years and over,	74	12	0	0	62	0	0
Income in 1999 at or above poverty level:,	35,608	711	7,598	16	26,298	453	282
Under 5 years,	4,150	38	1,101	2	2,872	112	29
5 years,	770	0	192	0	574	0	4
6 to 11 years,	3,907	173	861	0	2,768	60	0
12 to 17 years,	2,806	66	537	0	2,124	11	32
18 to 64 years,	23,098	424	4,691	14	17,341	264	203
65 to 74 years,	669	10	190	0	441	6	14
75 years and over,	208	0	26	0	178	0	0
Source: U.S. Census Bureau, Census 2000							

**TABLE 10: POVERTY STATUS IN 1999 BY AGE
TWO OR MORE RACES POPULATION FOR WHOM POVERTY STATUS IS DETERMINED**

Item	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah Co
Total:	380	4,499	39	23,250	464	160	29,082
Income in 1999 below poverty level:,	73	950	0	4,640	13	75	5,791
Under 5 years,	24	182	0	684	0	15	905
5 years,	0	26	0	97	0	0	123
6 to 11 years,	9	153	0	661	0	0	823
12 to 17 years,	19	177	0	545	0	0	741
18 to 64 years,	21	402	0	2,502	0	60	3,025
65 to 74 years,	0	0	0	91	0	0	91
75 years and over,	0	10	0	60	13	0	83
Income in 1999 at or above poverty level:,	307	3,549	39	18,610	451	85	23,291
Under 5 years,	43	441	2	2,565	83	0	3,155
5 years,	0	97	0	572	9	6	683
6 to 11 years,	43	637	4	2,526	104	6	3,387
12 to 17 years,	15	400	2	2,037	74	7	2,585
18 to 64 years,	198	1,832	31	10,190	170	66	12,580
65 to 74 years,	8	90	0	369	11	0	498
75 years and over,	0	52	0	351	0	0	403
U.S. Census Bureau, Census 2000							

TABLE 11: PORTLAND DEVELOPMENT COMMISSION ETHNICITY OF RENTERS OF CITY OF PORTLAND SUBSIDIZED HOUSING* 2004			
Count of Ethnicity			
URA	Ethnicity	Total	
Central Eastside	American Indian/Alaskan Native	6	
	American Indian/Alaskan Native & White	1	
	Asian	6	
	Asian & White	4	
	Balance/Other	6	
	Black/African American	12	
	Black/African American & White	1	
	Hispanic	6	
	Hispanic & American Indian/Alaskan Native & White	1	
	Hispanic & White	3	
	Native Hawaiian/Other Pacific Islander	2	
	White	143	
	Central Eastside	Total	191
	Downtown Waterfront	American Indian/Alaskan Native	5
American Indian/Alaskan Native & Black African Ame		1	
American Indian/Alaskan Native & White		3	
Asian		22	
Asian & White		1	
Balance/Other		7	
Black/African American		98	
Black/African American & White		3	
Hispanic		22	
Hispanic & White		4	
Native Hawaiian/Other Pacific Islander		4	
White	660		
Downtown Waterfront	Total	830	
Gateway	American Indian/Alaskan Native	2	
	Asian	3	
	Asian & White	1	
	Black/African American	16	
	Hispanic	13	
	Hispanic & Native Hawaiian/Other Pacific Islander	1	
	Other	2	
	White	142	
Gateway Total		180	
Interstate Corridor	American Indian/Alaskan Native	5	
	American Indian/Alaskan Native & White	1	

	Asian	2
	Balance/Other	53
	Black/African American	124
	Black/African American & White	4
	Hispanic	13
	Hispanic & American Indian/Alaskan Native	1
	Hispanic & White	4
	Native Hawaiian/Other Pacific Islander	2
	White	109
Interstate Corridor Total		318
Lents Town Center	American Indian/Alaskan Native	1
	Asian	1
	Balance/Other	6
	Black/African American	19
	Black/African American & White	2
	Hispanic	31
	Hispanic & White	1
	Native Hawaiian/Other Pacific Islander	1
	White	149
Lents Town Center Total		211
None	American Indian/Alaskan Native	8
	American Indian/Alaskan Native & White	2
	Asian	24
	Asian & White	5
	Balance/Other	133
	Black/African American	276
	Black/African American & White	4
	Hispanic	99
	Hispanic & American Indian/Alaskan Native	2
	Hispanic & American Indian/Alaskan Native & Black/	1
	Hispanic & Black/African American	2
	Hispanic & Native Hawaiian/Other Pacific Islander	1
	Hispanic & White	7
	Hispanic & American Indian/Alaskan Native & Black A	1
	Native Hawaiian/Other Pacific Islander	4
	White	766
None	Total	1,335
Oregon Convention Center	Asian	1
	Balance/Other	2
	Black/African American	1
	Black/African American	38
	Hispanic	3
	Hispanic & Black/African American	1

	White	17
Oregon Convention Center	Total	63
River District	American Indian/Alaskan Native	4
	American Indian/Alaskan Native & White	2
	Asian	16
	Asian & White	2
	Balance/Other	15
	Black/African American	20
	Black/African American & White	1
	Hispanic	18
	Hispanic & White	1
	Native Hawaiian/Other Pacific Islander	4
	White	277
River District	Total	360
South Park Blocks	American Indian/Alaskan Native	17
	Asian	31
	Asian & White	1
	Balance/Other	23
	Black/African American	81
	Black/African American & White	3
	Hispanic	39
	Hispanic & Asian	1
	Hispanic & Black/African American	1
	Hispanic & White	3
	Middle Eastern	1
	Native Hawaiian/Other Pacific Islander	6
	White	677
South Park Blocks	Total	884
Grand Total		4,372
Tenant records indicating "O", N/A, or "BLANK" were deleted		
*This data includes all City of Portland-Subsidized housing: Non-profit owned, HAP owned, privately owned, including Tax Increment, HOME, CDBG, City general fund.		

GEOGRAPHIC ANALYSIS

Map 1 shows the distribution of poverty in the region by census tract. Compared to other areas of Multnomah County, there are concentrations of poverty in the Inner Northeast, Outer Northeast and North neighborhoods in Portland as well as in Gresham and Fairview.

Map 2 shows a comparison of census data on poverty from 1989 and to that of 1999. There were increases in poverty in the same neighborhoods highlighted in Map 1, but much more widespread from the western end of North Portland to the entire east County area.

Map 3 shows low-income census tracts³¹, hazardous waste generators, hazardous waste sites, and the sites of new multi-family housing. Map 4 shows census tracts with substantial Hispanic populations, waste generators and hazardous waste sites. Tracts with substantial Hispanic populations are in East County, and along the northern rim of neighborhoods where there is a heavy concentration of toxic sites. Map 5 provides the same data for Native Americans, concentrated in North Portland, again in areas with substantial numbers of waste generators and sites.

Map 6 provides the same data with respect to Asian populations. There is a substantial population of Asian people toward the eastern end of Portland and in the area around the Goose Hollow neighborhood. Map 7 shows the distribution of African-Americans with substantial populations in the neighborhoods of the Northeast and North and over to the Sunderland and Airport neighborhoods on the north along the Columbia river.

Map 8 shows the change in the number of people in poverty from 1990 to 2000. The heaviest increases have been in the east county and the Old Town/Pearl District and Downtown. Conversely there has been some reduction in the numbers in North Portland in the Woodlawn, Concordia, Sabin, Portsmouth and adjacent neighborhoods.

Maps 9 and 10 show the concentrations of public housing units across the county, with concentrations in the North Portland, near Northeast and Northwest neighborhoods. This is also the same area where toxic sites and hazardous waste generators exist, as noted previously.

Maps 11 and 12 show affordable housing units, defined as units that have received locally controlled subsidy and provide rent restricted housing options. These are units owned by the Housing Authority of Portland (Map 11) and other private and/or nonprofit organizations, largely managed by privately property management companies. There are substantial numbers of these units in the near Northeast, Downtown and North neighborhoods, as well as in the east county area. Map 13 shows concentrations of Section 8 voucher holders in North Portland and the Old Town/Pearl, with substantial numbers to the east County neighborhoods.

Map 14 shows the dispersion of minority cost-burdened households. Cost-burdened means that the household pays more than 50% of its income for housing and housing

related expenses like insurance, property taxes and utilities. Note the heavy concentrations of these households in the Northeast and North Portland neighborhoods, indicating a significant need for affordable housing units.

Map 16 shows the location of physically disabled people. The heaviest concentrations are in the Downtown and Pearl areas, near Northeast, North Portland and the East and Southeast.

Infrastructure in the form of banks, groceries, hospitals and public schools are shown on Maps 17 and 18.

The distribution of very low-income minority households are shown on Map 19 with the heaviest concentrations in the Southwest and Near Northeast neighborhoods.

Maps 20-23 show the distribution of minority households in various income brackets.

Maps 24 and 25 show the distribution of mobile homes across the county. The heaviest concentrations are in the far North and far western portions of the county. Currently there are 124 mobile home parks in the county.³² There has also been a history of park closures in Multnomah County, displacing low-income mobile home owners who can not move their homes to costs or units condition. Map 25 shows average income levels for households living in mobile homes.

Map 26 shows the distribution of housing units with more than one person per room (i.e. crowded housing), and Map 27 shows the same distribution for ethnic minority households.

Map 28 shows the distribution of owner occupied housing when the householder is a member of an ethnic minority. Note that the heaviest concentrations of these households are in the Northeast neighborhoods.

Maps 29, 30 and 31 deal with housing units without normal plumbing facilities or without normal kitchen facilities. The heaviest concentrations of ethnic minority households without these facilities is in the Downtown and Northwest neighborhoods (please note that some of these units may be SRO housing) and in the neighborhoods around the airport and in the Pleasant Valley area.

Map 32 shows the distribution of very poor households living in pre-1950 housing, with concentrations in the Southwest, the eastern part of the county and two Northern neighborhoods. Tables 33 through 36 present the same statistics at higher income levels.

³² See Appendix XIII for names and locations.

Map 37 shows the percentage of very poor renters by neighborhood. There are concentrations in the far Northern and Northeast neighborhoods, the Downtown and Southwest neighborhoods and various neighborhoods in the East County. Map 38 presents the same data for renters in the 30% to 50% of median family income. Maps 39-42 show the distribution of families with various higher levels of income.

Map 43 shows the neighborhoods designated as “Distressed Areas” by the City of Portland. These include the St. Johns and contiguous areas, and various neighborhoods in the Northeast area to the east of I-5 and in the Lents neighborhood area.

Public elementary school attendance areas in the county are shown on Map 44. This map will be useful when reviewing the data on elementary school performance in Appendix III. High School attendance areas are presented in Map 45. Also of use in reviewing the data presented in the tables is Map 46 showing the locations of census tracts.

Map 47 shows the 2.5-mile Portland International Airport (PDX) clear safety zone. This area, as seen on a number of the maps discussed above, is in the neighborhood of high concentrations of various protected class members.

Maps 48 and 49 show, by neighborhood, the distribution of housing with no “housing unit problem³³” rented by the very low income elderly. Maps 50 and 51 show the distribution of housing with a housing unit problem rented by very low income elderly.

Map 56 shows the same data—defective housing, but here owned by very low income elderly persons, with the King neighborhood in Northeast Portland experiencing the highest levels. For elderly owners in the 30% to 50% income range the worst neighborhoods are the Woodlawn neighborhood in the Northeast and the Hayhurst neighborhood in Southwest.

Map 59 shows the distribution of owner occupied housing when the owner is receiving less than 30% of median income. The most impacted neighborhoods in the city on this score are the Sunderland (PDX) and Eliot neighborhoods.

Maps 60 and 61 show the distribution of owners in the 30% to 50% range of MFI and 50% to 60% range, respectively. The most impacted neighborhoods in the former category is Eliot. The 50% to 60% owners are most concentrated in the Overlook neighborhood in North Portland, across the northern tier of neighborhoods and in the Center and Brentwood-Darlington neighborhoods in the center and south of Portland.

Maps 64-70 demonstrate the distribution of rental housing units by size, and provide an

³³ Housing Unit Problems are defined as units lacking complete plumbing facilities, or lacking complete kitchen facilities, or with 1.01 or more persons per room, or with cost burden more than 30.0% of income going to housing costs.

average rent based on recent survey data provided by the Metro Multifamily Housing Association.

MINORITY HOMEOWNERSHIP

The availability of commercial credit presents a substantive impediment to home ownership choices in Multnomah County. This analysis looks at the lending patterns as reflected in Home Mortgage Disclosure Act (HMDA) data for the years 2000 through 2003 (the most recent year available).

Home mortgage lending in Multnomah County occurs in a racially diverse county. According to the 2000 Census data, there are 272,098 households in Multnomah County. Of these households, 84% of the population (229,431) is White alone, 4.9% (13,339) is Black alone, and 4.4% (11,896) is Hispanic/Latino. There are 154,784 homeowners in Multnomah County. Of those, 137,344 are White (88.7%), 4,982 Black (3.2%), and 11,896 are Hispanic (7.7%).³⁴ Of the 11,896 Hispanic householders, 3,369 (28.3%) are homeowners while 8,527 are renters. Even assuming that all Hispanic homeowners are white,³⁵ the distribution of homeowners would be as follows:

TABLE 12: NUMBER OF HOMEOWNERS BY RACE AND HISPANIC ETHNICITY, MULTNOMAH COUNTY, OREGON		
Ethnicity	Homeowners	Percentage
White alone	137,344	88.7%
Black alone	4,982	3.2%
Hispanic/Latino	3,369	2.2%
Total homeowners	154,784	100.0%

TABLE 13: YEAR MOVED INTO COUNTY BY RACE, MULTNOMAH COUNTY, OREGON			
	White	Black	Hispanic /a/
Total	493,623	32,913	43,045
Same house	232,717	13,575	10,936
Different house	260,906	19,338	32,109
U.S./Same county	141,778	13,568	13,911
U.S./Different county	106,949	4,546	9,934
U.S./Same state	44,003	786	2,772
U.S./Different state	62,946	3,760	7,162

/a/ Not mutually exclusive. Some White and Black persons are also Hispanic.

³⁴ White and Black households exclude those that are Hispanic.

³⁵ Of the Hispanic households, only a handful are Black alone.

TABLE 14: NUMBER OF HOUSEHOLDS BY YEAR MOVED INTO RESIDENCE: MULTNOMAH COUNTY, OREGON			
	White	Black	Hispanic /a/
Total	229,431	13,339	11,896
1999 – March 2000	55,182	4,123	5,192
1995 – 1998	69,547	4,349	4,333
1990 – 1994	36,715	1,751	1,258
1980 – 1989	30,276	1,253	690
1970 – 1979	18,668	926	304
1969 and earlier	19,043	937	119

/a/ Not mutually exclusive. Some White and Black households are also Hispanic.

TABLE 15: PERCENT OF OWNER-OCCUPIED HOME PURCHASE: MORTGAGES BY RACE AND HISPANIC STATUS, MULTNOMAH COUNTY, OREGON				
	2000	2001	2002	2003
Pct to Whites	83.7%	84.7%	84.4%	83.5%
Pct to Blacks	1.9%	2.1%	1.6%	1.9%
Pct to Asians	5.2%	4.6%	5.4%	5.7%
Pct to Native Americans	0.5%	0.4%	0.2%	0.3%
Percent to Other Races	1.1%	0.9%	1.1%	1.0%
Pct to Hispanics	4.2%	4.1%	3.7%	3.8%
Pct to Mixed Race Pairs	3.5%	3.2%	3.5%	3.9%

TABLE 16: PERCENT OF OWNER-OCCUPIED HOME PURCHASE MORTGAGES BY RACE AND HISPANIC STATUS, MULTNOMAH COUNTY, OREGON

Pct to	Fairview				Gresham				00 - 03	Portland				Troutdale				Wood Village			
	00	01	02	03	00	01	02	03		00	01	02	03	00	01	02	03	00	01	02	03
Whites	85.0%	85.4%	78.7%	69.2%	83.6%	85.3%	83.2%	84.1%	Maywood Park data not available	83.5%	84.4%	84.6%	83.5%	86.8%	87.6%	87.3%	83.0%	82.2%	85.8%	80.6%	80.0%
Blacks	1.0%	0.8%	0.7%	6.0%	1.1%	1.0%	1.2%	1.3%		2.1%	2.3%	1.7%	2.0%	1.0%	0.9%	0.8%	0.4%	3.3%	0.9%	3.1%	0.0%
Asians	3.0%	6.2%	10.7%	2.8%	4.2%	3.8%	4.4%	4.6%		5.5%	4.8%	5.6%	5.9%	2.3%	2.3%	3.3%	3.1%	1.1%	1.8%	3.1%	8.6%
Native Americans	1.0%	0.0%	0.0%	0.0%	0.3%	0.5%	0.4%	0.1%		0.5%	0.3%	0.2%	0.3%	0.3%	0.6%	0.0%	0.4%	1.1%	0.0%	0.0%	0.0%
Other Races	4.0%	0.0%	1.3%	3.8%	1.2%	0.6%	1.0%	0.7%		1.0%	0.9%	1.2%	1.0%	1.3%	1.5%	0.5%	1.3%	2.2%	2.7%	0.0%	0.0%
Hispanics	0.0%	3.1%	1.3%	3.8%	6.3%	6.1%	6.0%	6.0%		4.0%	3.9%	3.3%	3.4%	2.7%	5.3%	4.4%	6.7%	4.4%	7.1%	7.1%	8.6%
Mixed Race Pairs	6.0%	4%	7.3%	4.5%	3.4%	2.7%	3.8%	3.2%		3.5%	3.4%	3.4%	4.0%	5.6%	1.8%	3.7%	4.9%	5.6%	1.8%	6.1%	2.9%

There is significant in-migration to Multnomah County. For example, 106,949 White persons moved in from a different county in the U.S. within the five years preceding the 2000 Census. Nearly 10,000 Hispanic persons moved into Multnomah County from a different county during that time period.

Even apart from the in-migration to Multnomah County, there is considerable mobility within the county as well. Of the 11,896 Hispanic households in the county, for example, nearly half (5,192) moved into their current residence within the past year.

Despite the inflow of Black and Hispanic households into Multnomah County, as well as the intra-county mobility, area lending institutions are not making home loans to these households. According to HMDA data for Multnomah County (OR),³⁶ the overwhelming majority of home purchase mortgages are provided to White households. In 2003, more than 83% of owner-occupied home purchase mortgages were provided to White households. In contrast, only 3.8% of purchase mortgages for owner-occupied homes were made to Hispanics while only 1.9% were provided to Blacks.

The question for this analysis of impediments is whether these disparate rates of lending are the result of different treatment of loan applicants and, therefore, whether the availability of commercial credit represents an impediment to housing choice in Multnomah County (and its component communities). An analysis of the denial rate for conventional purchase loans, holding income constant, indicates that commercial credit is, indeed, disparately denied to households of color in Multnomah County.

An examination of HMDA data for low-income, middle-income and high-income loan applicants for conventional purchase loans in Multnomah County (and its component communities) reveals that households of color are rejected at a higher rate than are similarly situated White households. Within the low-income population, Blacks face a denial rate 40% higher than do Whites, while Hispanics face a denial rate 60% higher. These disparate denial rates have existed over the full four years of data examined.

³⁶ All HMDA data discussed in this analysis is provided by Fannie Mae (August/September, 2004).

TABLE 17: DENIAL RATE OF CONVENTIONAL PURCHASE LOANS TO LOW-INCOME APPLICANTS, MULTNOMAH COUNTY, OREGON				
Pct Denied	2000	2001	2002	2003
Whites	24.1%	16.3%	13.8%	14.9%
Blacks	32.6%	35.2%	30.9%	20.8%
Asians	15.9%	11.8%	10.8%	15.3%
Native Americans	32.1%	22.2%	15.4%	34.8%
Hispanics	37.0%	33.6%	32.4%	25.2%
Total	27.4%	19.7%	15.5%	16.0%

Within the middle-income population, Blacks face a denial rate 250% higher than do Whites, while Hispanics face a denial rate 240% higher.

TABLE 18: DENIAL RATE OF CONVENTIONAL PURCHASE: LOANS TO MIDDLE-INCOME APPLICANTS, MULTNOMAH COUNTY, OREGON				
Pct Denied	2000	2001	2002	2003
Whites	16.1%	10.7%	11.6%	10.5%
Blacks	25.4%	27.9%	18.6%	27.9%
Asians	17.1%	10.1%	11.4%	10.0%
Native Americans	38.5%	42.9%	22.2%	14.3%
Hispanics	21.6%	29.1%	18.2%	25.7%
Total	18.1%	12.5%	11.9%	11.7%

Finally, within the high-income population, Blacks experience a denial rate 210% higher than do Whites, while Hispanics experience a denial rate 260% higher.

TABLE 19: DENIAL RATE OF CONVENTIONAL PURCHASE, LOANS TO HIGH-INCOME APPLICANTS, MULTNOMAH COUNTY, OREGON

Pct Denied	2000	2001	2002	2003
Whites	10.9%	8.0%	7.8%	9.8%
Blacks	28.4%	21.7%	22.1%	21.1%
Asians	15.7%	12.0%	12.2%	19.2%
Native Americans	28.6%	38.9%	18.2%	57.1%
Hispanics	21.7%	14.3%	20.3%	26.2%
Total	11.9%	8.8%	8.3%	10.7%

The following tables present data for each component community. The percentages are, however, less meaningful for the component communities given the low absolute numbers of loans involved with Black and Hispanic households.

TABLE 20: DENIAL RATE OF CONVENTIONAL PURCHASE LOANS TO LOW-INCOME APPLICANTS BY RACE AND HISPANIC STATUS, COMMUNITIES WITHIN MULTNOMAH COUNTY, OREGON

Pct to	Fairview				Gresham				Portland				Troutdale				Wood Village				
	00	01	02	03	00	01	02	03	00 - 03	00	01	02	03	00	01	02	03	00	01	02	03
Whites	47.5%	39.4%	10.0%	12.1%	27.1%	21.6%	15.9%	18.1%		21.6%	14.9%	13.3%	14.1%	49.0%	21.6%	11.4%	19.8%	35.0%	16.7%	32.1%	30.0%
Blacks	0.0%	100%	N/A	0.0%	0.0%	33.3%	0.0%	12.5%		33.3%	33.7%	32.6%	22.1%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Asians	0.0%	0.0%	0.0%	0.0%	16.4%	0.0%	12.4%	15.0%		15.6%	12.4%	11.0%	15.4%	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A
Native Americans	100%	0.0%	N/A	N/A	N/A	0.0%	0.0%	0.0%		32.0%	28.6%	16.7%	34.8%	0.0%	0.0%	N/A	N/A	0.0%	N/A	N/A	N/A
Hispanics	100%	42.9%	N/A	25.0%	16.4%	0.0%	12.4%	15.0%		33.0%	34.1%	32.2%	24.3%	50.0%	40.0%	0.0%	0.0%	50.0%	40.0%	0.0%	40.0%
Total	55.7%	44.8%	19.0%	13.1%	27.0%	23.4%	18.3%	18.3%		25.2%	18.2%	14.8%	15.4%	47.8%	32.6%	14.6%	18.5%	37.5%	29.4%	25.0%	21.7%

TABLE 21: DENIAL RATE OF CONVENTIONAL PURCHASE LOANS TO MIDDLE-INCOME APPLICANTS BY RACE AND HISPANIC STATUS COMMUNITIES WITHIN MULTNOMAH COUNTY, OREGON

Pct to	Fairview				Gresham				00 – 03	Portland				Troutdale			Wood Village					
	00	01	02	03	00	01	02	03		00	01	02	03	00	01	02	03	00	01	02	03	
Whites	27.0%	7.1%	6.2%	18.2%	15.5%	10.2%	14.2%	10.7%	Maywood Park data not available	15.1%	11.0%	11.4%	10.6%	22.6%	5.1%	9.4%	2.6%	45.2%	7.0%	20.7%	0.0%	
Blacks	N/A	100%	N/A	16.7%	0.0%	32.8%	39.6%	23.1%		24.1%	25.7%	16.2%	29.9%	N/A	65.2%	N/A	N/A	N/A	N/A	0.0%	N/A	N/A
Asians	0.0%	0.0%	9.1%	14.3%	17.1%	4.9%	8.1%	9.3%		17.4%	11.1%	11.9%	10.2%	0.0%	N/A	N/A	0.0%	N/A	N/A	N/A	0.0%	
Native Americans	N/A	N/A	N/A	N/A	100%	33.3%	20.0%	0.0%		20.0%	50.5%	25.0%	22.2%	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	0.0%	
Hispanics	50.0%	N/A	0.0%	50.0%	8.2%	28.3%	10.1%	25.0%		22.3%	29.1%	21.3%	25.3%	100%	48.4%	0.0%	0.0%	100%	0.0%	0.0%	100%	
Total	28.0%	14.5%	7.4%	18.2%	17.3%	12.5%	13.5%	12.7%		16.8%	12.5%	11.7%	11.6%	30.6%	10.0%	9.8%	6.4%	47.9%	8.8%	18.6%	12.5%	

TABLE 22: DENIAL RATE OF CONVENTIONAL PURCHASE LOANS TO HIGH-INCOME APPLICANTS BY RACE AND HISPANIC STATUS COMMUNITIES WITHIN MULTNOMAH COUNTY, OREGON

Pct to	Fairview				Gresham				00 - 03	Portland				Troutdale				Wood Village			
	00	01	02	03	00	01	02	03		00	01	02	03	00	01	02	03	00	01	02	03
Whites	9.1%	14.9%	8.7%	12.8%	15.1%	12.4%	7.6%	10.4%	Maywood Park data not available	10.2%	7.3%	7.7%	9.6%	15.9%	6.0%	9.3%	7.7%	15.0%	9.7%	16.7%	7.1%
Blacks	N/A	N/A	0.0%	N/A	62.5%	N/A	0.0%	40.0%		26.0%	22.1%	23.4%	19.7%	0.0%	N/A	N/A	N/A	0.0%	N/A	N/A	N/A
Asians	0.0%	0.0%	0.0%	25.0%	12.8%	19.0%	0.0%	27.3%		16.0%	11.6%	13.4%	18.4%	0.0%	0.0%	0.0%	N/A	0.0%	0.0%	0.0%	N/A
Native Americans	N/A	N/A	N/A	N/A	50.0%	N/A	100%	N/A		20.0%	25.0%	11.1%	66.7%	100%	100%	N/A	N/A	100%	N/A	N/A	N/A
Hispanics	0.0%	0.0%	0.0%	N/A	21.8%	0.0%	27.9%	14.3%		21.3%	16.7%	15.1%	28.8%	0.0%	0.0%	65.9%	0.0%	0.0%	N/A	0.0%	N/A
Total	14.0%	16.3%	6.2%	13.7%	16.7%	12.3%	7.9%	11.6%		11.0%	8.2%	8.2%	10.5%	19.5%	11.2%	14.0%	5.9%	17.1%	13.2%	11.9%	12.5%

One of the impacts of not being able to access credit through the traditional commercial credit market is to force potential borrowers into the subprime market. The total market share of conventional home purchase loans has increased in both absolute numbers and percentage of the market. Roughly 1,300 more loans were written by subprime lenders in 2004 than in 2000. While the bulk of those were provided to White households, the subprime lending to Hispanics more than tripled in the four years.

Of concern is the high proportion of subprime loans written to Blacks and Hispanics. While 42% of all conventional home purchase loans to Blacks in Multnomah County were by subprime lenders, 41% of all conventional home purchase loans to Hispanics were.

TABLE 23: CONVENTIONAL HOME PURCHASE LOANS BY SUBPRIME LENDERS BY RACE AND HISPANIC STATUS, MULTNOMAH COUNTY, OREGON				
	2000	2001	2002	2003
Whites	12.3%	12.4%	14.5%	17.9%
Blacks	37.3%	31.2%	33.6%	41.5%
Asians	14.6%	9.5%	11.6%	16.0%
Native Americans	23.5%	32.3%	50.0%	16.0%
Hispanics	26.9%	29.2%	31.8%	40.9%
Total of conventional mortgages by subprime	12.3%	12.0%	14.4%	18.6%

TABLE 24: NUMBER OF CONVENTIONAL HOME PURCHASE LOANS BY SUBPRIME LENDERS, MULTNOMAH COUNTY, OREGON				
	2000	2001	2002	2003
Whites	930	1,014	1,325	1,896
Blacks	53	50	45	88
Asians	71	47	75	123
Native Americans	8	10	12	4
Hispanics	42	50	63	131
Total number of subprime conventional loans	1,218	1,302	1,751	2,543

Of even greater concern is the disproportionate percentage of refinancing loans made

by subprime lenders to Multnomah County's Black and Hispanic populations. Black households accessed the subprime market at a rate four times higher than did White households (7.6% vs. 28.3), while Hispanics accessed the subprime market at a rate three times higher than Whites (7.6% vs. 20.5%).

TABLE 25: HOME REFINANCING LOANS BY SUBPRIME LENDERS BY RACE AND HISPANIC STATUS, MULTNOMAH COUNTY, OREGON				
Pct Denied	2000	2001	2002	2003
Whites	24.3%	8.6%	8.3%	7.6%
Blacks	46.4%	24.5%	26.7%	28.3%
Asians	27.5%	6.9%	6.5%	8.7%
Native Americans	44.4%	11.5%	12.1%	13.6%
Hispanics	31.2%	12.0%	21.7%	20.5%
Total of refinancing loans	31.2%	12.0%	21.7%	20.5%

TABLE 26: NUMBER OF REFINANCING HOME PURCHASE LOANS BY SUBPRIME LENDERS BY RACE AND HISPANIC STATUS, MULTNOMAH COUNTY, OREGON				
	2000	2001	2002	2003
Whites	1,025	1,293	1,628	2,234
Blacks	123	103	133	220
Asians	46	51	62	141
Native Americans	12	6	7	12
Hispanics	29	36	74	116
Total number of subprime refinancing	1,597	2,111	2,599	3,656

The disproportionate use of the subprime market by Black and Hispanic households, both for conventional home purchase loans and for refinancing loans, is of concern, particularly if these households are forced into the market by the disproportionate denial of credit identified above. According to Fannie Mae's HMDA web site:

The term "subprime" typically refers to loans made to borrowers who are higher-risk because of impaired or limited credit histories, high ratios of debt to income, high loan-to-value ratios, or inadequate loan documentation. To offset the higher risks associated with these loans, borrowers are charged higher interest rates and possibly also higher up-front fees. "Predatory" loans are a subset of subprime loans. Among the practices that characterize predatory lending are charging excessive interest rates and fees and the imposition of single-premium credit life insurance and prepayment penalties that provide no countervailing benefit to the borrower. Although not all subprime lending is predatory, subprime and predatory loans share the distinction of charging borrowers interest rates that are higher than conventional rates.

To the extent that the disproportionate denial of households of color in the conventional commercial credit market drives those households to the high cost subprime market, the denial of credit is a serious impediment to housing choice in Multnomah County.

**TABLE 27: CONVENTIONAL MORTGAGE LOANS BY SUBPRIME LENDERS BY RACE COMPONENT
COMMUNITIES OF MULTNOMAH COUNTY, OREGON**

Pct to	Fairview				Gresham				00 - 03	Portland				Troutdale				Wood Village				
	00	01	02	03	00	01	02	03		00	01	02	03	00	01	02	03	00	01	02	03	
Whites	5.0%	13.7%	17.4%	13.3%	15.7%	13.5%	17.4%	23.5%	Maywood Park data not available	11.9%	12.2%	14.0%	17.0%	15.3%	13.1%	18.4%	20.1%	17.6%	19.2%	19.7%	29.2%	
Blacks	0.0%	N/A	0.0%	0.0%	42.9%	71.7%	41.8%	57.1%		38.2%	30.2%	32.7%	41.3%	0.0%	0.0%	0.0%	N/A	0.0%	0.0%	0.0%	0.0%	0.0%
Asians	0.0%	14.3%	13.3%	12.5%	9.9%	14.6%	13.4%	26.9%		15.4%	8.8%	11.4%	14.4%	0.0%	0.0%	17.8%	28.6%	0.0%	0.0%	0.0%	0.0%	66.7%
Native Americans	N/A	N/A	N/A	N/A	N/A	50.0%	80.0%	N/A		21.9%	27.3%	44.4%	18.2%	0.0%	0.0%	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A
Hispanics	N/A	66.7%	0.0%	0.0%	38.9%	15.2%	49.2%	51.0%		25.0%	30.6%	29.5%	39.0%	34.8%	29.1%	9.4%	54.5%	100%	40.0%	20.0%	0.0%	0.0%
Pct of total mortgage loans	4.0%	13.4%	14.4%	12.2%	14.9%	13.8%	18.8%	25.5%	N/A	12.0%	11.7%	13.7%	17.5%	14.0%	11.7%	19.0%	23.5%	14.5%	17.5%	20.8%	31.2%	

TABLE 28: NUMBER OF CONVENTIONAL MORTGAGE LOANS BY SUBPRIME LENDERS BY RACE AND HISPANIC STATUS COMPONENT COMMUNITIES OF MULTNOMAH COUNTY, OREGON

Pct to	Fairview				Gresham				00 - 03	Portland				Troutdale				Wood Village			
	00	01	02	03	00	01	02	03		00	01	02	03	00	01	02	03	00	01	02	03
Whites	4	14	16	11	123	121	181	302	Maywood Park data not available	766	840	1,071	1,512	16	16	28	34	4	7	6	7
Blacks	0	0	0	0	3	4	4	12		50	46	39	76	0	0	0	0	0	0	0	0
Asians	0	1	2	2	5	7	8	21		66	38	64	95	0	0	1	2	0	0	0	2
Native Americans	0	0	0	0	0	2	4	0		7	6	8	4	0	0	0	0	0	0	0	0
Hispanics	0	2	0	0	7	5	18	25		34	39	44	98	1	1	1	6	0	1	0	0
Total conventional subprime loans	4	18	19	16	148	154	258	417		1,023	1,082	1,402	2,012	19	18	38	53	5	8	9	10

TABLE 29: REFINANCING LOANS BY SUBPRIME LENDERS BY RACE AND HISPANIC STATUS COMPONENT COMMUNITIES OF MULTNOMAH COUNTY, OREGON

Pct to	Fairview				Gresham				00 - 03	Portland				Troutdale				Wood Village			
	00	01	02	03	00	01	02	03		00	01	02	03	00	01	02	03	00	01	02	03
Whites	42.3 %	4.3%	5.3%	5.8%	20.2 %	9.8%	7.5%	8.7%	Maywood Park data not available	24.5 %	8.3%	8.4%	7.4%	32.2 %	115%	8.2%	8.6%	26.9 %	14.2 %	10.9 %	12.0%
Blacks	N/A	0.0%	0.0%	0.0%	83.3 %	11.4 %	25.5 %	31.6 %		45.6 %	25.3 %	26.8 %	28.4 %	N/A	0.0%	20.5 %	0.0%	N/A	0.0%	33.3 %	33.3%
Asians	0.0%	0.0%	0.0%	4.5%	33.7 %	6.6%	3.9%	7.5%		27.2 %	7.0%	6.8%	9.1%	N/A	5.5%	11.4 %	0.0%	N/A	14.3 %	0.0%	0.0 %
Native Americans	N/A	N/A	N/A	N/A	50.0 %	0.0%	0.0%	9.1%		45.5 %	11.1 %	15.6 %	14.3 %	N/A	0.0%	0.0%	N/A	N/A	0.0%	0.0%	N/A
Hispanics	100%	N/A	N/A	0.0%	18.2 %	4.7%	19.7 %	18.9 %		32.9 %	12.5 %	22.0 %	20.8 %	N/A	10.4 %	32.6 %	21.4 %	N/A	25.0 %	0.0%	0.0 %
	%																				
Pct of total mortgage loans	40.0 %	3.3%	6.1%	5.6%	21.4 %	10.9 %	8.3%	10.1 %		27.3 %	10.0 %	9.5%	9.0%	32.5 %	12.0 %	9.2%	9.0%	28.8 %	12.6 %	11.5 %	15.0%

TABLE 30: NUMBER OF REFINANCING MORTGAGE LOANS BY SUBPRIME LENDERS BY RACE AND HISPANIC STATUS COMPONENT COMMUNITIES OF MULTNOMAH COUNTY, OREGON

Pct to	Fairview				Gresham				00 - 03	Portland				Troutdale				Wood Village				
	00	01	02	03	00	01	02	03		00	01	02	03	00	01	02	03	00	01	02	03	
Whites	11	4	7	11	100	172	167	319	Maywood Park data not available	854	1,041	1,372	1,893	32	32	33	54	7	9	9	9	
Blacks	0	0	0	0	5	1	4	6		118	102	128	213	0	0	1	0	0	0	0	0	1
Asians	0	0	0	1	5	5	3	11		41	45	58	129	0	1	1	0	0	0	0	0	0
Native Americans	0	0	0	0	1	0	0	1		10	5	7	11	0	0	0	0	0	0	0	0	0
Hispanics	1	0	0	0	2	2	9	14		26	31	63	98	0	1	2	3	0	0	0	0	0
Total	12	4	11	15	144	260	255	468		1,359	1,738	2,221	3,018	41	45	59	70	8	12	14	15	

NEIGHBORHOOD CRIME DATA

Portland Police Bureau crime data is presented in detail by type of crime and neighborhood in Appendix IV for Portland neighborhoods. The data is arranged in two sets of tables. The first ranks neighborhoods and neighborhood association areas by the incidence of the most serious “Part I” crimes (see below table 31). The second table in Appendix IV ranks the neighborhoods by the incidence of Part I crimes per thousand residents. A summary of these two tables is presented in Table 32.

Several things can be seen from Table 32. Note in the first panel showing the distribution of Part 1 crimes, that data for ten areas of Portland are broken out. In terms of the total number of serious crimes in each area, the largest number of crimes were committed in the East area, with the Inner SE coming second, Inner NE coming third and North coming forth.

On the other hand if we look not at the number of crimes but instead at the part 1 crime rate per thousand residents, the worse neighborhood by far is Downtown at 356 crimes per thousand residents, with NW coming second at 117 and Inner NE a far off second at 102 and North at 79. Part 2 and Part 3 crimes show similar patterns. In the fourth panel of Table 32 showing the combined numbers and rates of Parts 1, 2, and 3, the worst area in the city for absolute numbers is the East, with Inner SE second worst, and

TABLE 31: PORTLAND POLICE BUREAU CRIME CATEGORIES		
Part I Crimes	Part II Crimes	Part III Crimes
Murder	Simple Assault	Traffic Violations
Rape	Forgery	Protective Custody
Robbery	Fraud	Other Custody
Aggravated Assault	Stolen Property	Warrants
Burglary	Vandalism	Fugitives
Auto Theft	Weapons Violation	
Arson	Prostitution	
	Sex Crimes	
	Drug Crimes	
	Gambling	
	Family Offenses	
	DUII	

	Liquor Law Violation	
	Disorderly Conduct	
	Kidnapping	
	Curfew Violations	
	Runaway	
	All Others	

Source: Portland Police Bureau, 2002 Statistical Report, p.19.

Inner NE third worst for a total of 46% of all crimes in the city.

On the other hand in terms of the volume of crime given the number of people that live in the area, Downtown (1,769 crimes per thousand residents) is by far the worst, with Northwest (371 per thousand) second, and Inner NE (353 per thousand) third.

TABLE 32: STATISTICS ON PART I CRIME											
	North	Inner NE	Central NE	East	Inner SE	Outer SE	SW	NW	Outer SE	Down T	TOTAL
Neighborhoods	11	13	8	13	16	5	18	10	5	2	101
Total Population	54,428	59,368	43,509	111,335	97,977	46,537	63,737	25,469	43,665	10,617	556,642
Total Part 1 Crimes	4,295	6,037	2,619	9,925	6,670	3,679	2,420	2,989	3,679	3,780	46,093
Average rate per 1000	79	102	60	89	68	79	38	117	84	356	83
STATISTICS ON PART II CRIME											
	North	Inner NE	Central NE	East	Inner SE	Outer SE	SW	NW	Outer SE	Down T	TOTAL
Neighborhoods	11	13	8	13	16	5	18	10	5	2	101
Total Population	54,428	59,368	43,509	111,335	97,977	46,537	63,737	25,469	43,665	10,617	556,642

Total Part 2 Crimes	4,959	5,171	2,541	7,860	5,222	2,979	1,775	2,629	2,979	5,743	41,858
Average rate per 1000	91	87	58	71	53	64	28	103	68	541	75
STATISTICS ON PART III CRIME											
	North	Inner NE	Central NE	East	Inner SE	Outer SE	SW	NW	Outer SE	DownT	TOTAL
Neighborhoods	11	13	8	13	16	5	18	10	5	2	101
Total Population	54,428	59,368	43,509	111,335	97,977	46,537	63,737	25,469	43,665	10,617	556,642
Total Part 3 Crimes	9,480	9,749	5,156	16,484	10,241	6,782	3,224	3,831	6,782	9,263	80,992
Average rate per 1000	174	164	119	148	105	146	51	150	155	872	146
STATISTICS ON PARTS I, II AND III CRIME											
	North	Inner NE	Central NE	East	Inner SE	Outer SE	SW	NW	Outer SE	DownT	TOTAL
Neighborhoods	11	13	8	13	16	5	18	10	5	2	101
Total Population	54,428	59,368	43,509	111,335	97,977	46,537	63,737	25,469	43,665	10,617	556,642
Totals Parts I, II, & III	18,734	20,957	10,316	34,269	22,133	13,440	7,419	9,449	13,440	18,786	168,943
Average rate per 1000	344	353	237	308	226	289	116	371	308	1,769	304
Source: Portland Police Bureau, 2002 Statistical Report See Appendix IV for the data by individual neighborhood.											

HOMELESSNESS

Homelessness has been identified as a significant problem in Portland. On a typical night approximately 4,000 people are homeless. Between 16,000 and 18,000 individuals experience homelessness per year.

Of those served by homeless shelters approximately 1% are homeless youth, 47% are single adults and 52% are people from families with children. Of all those served by agencies helping the homeless, unaccompanied young people were about 4% of the total, domestic violence victims were about 10%, single adults about 58%, and families with children about 28%.⁴¹ Twelve percent of homeless people are actually employed but can not afford to rent.

Approximately 30% of homeless people in Portland have a chemical addiction and 18% have a mental illness. Major cuts in the Oregon's expanded Medicaid coverage through the Oregon Health Plan have sharply worsened the

⁴¹ Citizen Commission on Homelessness, Home Again, A 10-Year Plan to End Homelessness in Portland and Multnomah County, pp. 11-12.

problem.⁴²

Several barriers have been identified that deter homeless people/families from accessing housing. These barriers include: criminal history and police contact, eviction history, immigrant status, language/culture, domestic violence, disabilities in the household, credit history, child welfare involvement, alcohol and drug issues, lack of basic organizing skills and employability; additionally, lack of financial means to pay first and last month rent and deposit, utility deposits, and to maintain on-going rental payments⁴³.

The City has now determined in its Ten Year-Plan to 'shift paradigms' and focus on "Housing First" to solve the problems described above. This will entail major changes in the development of affordable housing, which the City summarizes in the following table.

⁴² Ibid, p.12-13.

⁴³ Ibid, p. 16.

TABLE 33: POLICY CHANGES AS PART OF THE HOUSING FIRST APPROACH ⁴⁴	
Old Policy	New Policy
1. Targeting rents to households with incomes between 30% and 60% of MFI	1. Targeting rents to households with incomes between 0% and 30% MFI
2. A 'step ladder' approach: homelessness or shelter to transitional housing to permanent housing.	2. A Housing First approach: Homelessness or shelter directly to permanent housing
3. A drive to spread City subsidy dollars across as many units as possible with an eye to high unit production	3. A drive to provide a deep City subsidy to fewer units with an eye toward stabilization of vulnerable populations
4. Ad hoc coordination of services and housing coordination	4. Well planned and committed coordination of services and housing
5. Support services that transition people from one housing situation to another	5. Support services that stabilize people in a permanent housing situation

ELEMENTARY SCHOOL STUDENT PERFORMANCE DATA

Elementary school performance data for individual Portland elementary schools is provided in Appendix III. The data includes the protected class makeup of the students in each school and the performance of those protected class members by group on both English and math tests. **The data is now complete but the results of the analysis are still in process. TLA**

⁴⁴ BHCD, Housing Development Concept Paper (Draft), p.3.

MEMBERSHIP ON BOARDS AND COMMISSIONS

Various county and municipal boards and commissions have an impact on fair housing issues in the community. It is important that protected class members not be excluded from membership on these boards for two reasons. First, to ensure that the specific concerns of the group are considered in the process of decision making. And second, to provide an opportunity for members of minority groups to develop civic leadership skills and contacts in government and business that may be of use to their communities. Table 33a shows the protected class representation on boards and commissions that affect housing policy in Multnomah County.

TABLE 33A: PROTECTED CLASS REPRESENTATION ON BOARDS AND COMMISSIONS

Demographic Profile of Boards/Commissions that Entertain Housing Policy Decisions

	Race Non-white	Disability	Sexual Orientation Not Heterosexual	Familial Status School age children living at home	Age Over 62	Religion	National Origin	Gender
HCDC 8 board members	1 African Am 1 Latino 6 Caucasian	0	0	6	2	1	1	4 females
PDC 5 board members	1 African Am 1 Latino 3 Caucasian	0	0	0	0	0	0	1 female
HAP 504 Disability Board 9 board members	0	6	0	0	0	0	0	No Data
Portland Planning Commission 7 board members	0	0	1	1	1	1	0	3 females
HAP Board 8 board members	1 African Am 1 Latino	0	1	2	1	0	0	4 females
Gresham Community Services Advisory	0	1	1	2	2	2	0	4 females
Gresham Planning Commission	0	0	0	1	1	0	0	No Data

Fairview Planning Commission 7 board members	0	0	0	2	1	0	0	2 females 5 male
Troutdale Planning Commission	0	0	0	2	1	0	0	2 females
Woof Village Planning Commission 7 Board Members	0	0	0	0	0	0	0	1 female 6 males
Multnomah County Commission on Children and Families 22 board members	1 African Am 1 Latino 1 Asian	0	0	10	1	0	0	17 females 5 males

AFFORDABILITY AND FAIR HOUSING

Housing affordability has become a dramatic problem in the Portland area during the last several years with the housing boom, the extensive construction of expensive housing within the city and rising rents and other costs facing an expanding population with incomes not keeping pace with rapidly increasing middle class incomes.

**TABLE 34: HOUSING PRICES IN THE PORTLAND AREA
AUGUST 2004 – AUGUST 2005**

Area	August 2004	August 2005	Percentage Increase
North Portland	\$166,900	\$215,000	29%
Northeast Portland	190,000	244,500	29%
West Portland	294,900	367,000	25%
Gresham/Troutdale/ Sandy/Corbett/ Fairview	185,000	222,500	20%
Southeast Portland	175,100	210,000	20%

Source: Oregonian, September 18, 2005, A8

Yet it was not always this way. In the early 1980s, Northeast Portland alone contained nearly 3,000 abandoned houses. In the years since, however, we've seen a dramatic increase in population with a 21% growth rate in Portland between 1990 and 2000. At the same time the median household income for a family of four increased from \$37,000 in 1990 to \$57,200 in 2002 for a 35% increase. The increase in incomes was not, however, evenly spread across all classes of homeowners and renters: in this period the number of households with a severe housing cost burden was at 9% for homeowners and 21% for renters.⁴⁵

Lower-income renters feel the impact disproportional. Areas of the city such as North and Northeast Portland that once experienced high vacancy rates (9.6% in 1990) have seen a decrease (4.6% in 2002) while citywide rates during this period have remained stable (5.6%). Economic forces in Portland threaten the preservation of affordable rental housing that has traditionally housed the most vulnerable households in the area, the disabled, the elderly who live on a fixed income, and families with low incomes that need to live close to the places where family members work. As of 2002 one-bedroom apartments were renting for \$691-899, and it was "increasingly difficult to obtain downtown housing that is affordable to low-income households. Twenty-eight percent of renters within the central city area face a severe housing cost burden."⁴⁶ Tables 35 and 36 present data on median family incomes and the 30% rent standard, which, as noted above, includes rent or mortgage, insurance and utilities.

As housing prices continue to rise, the poverty rate in Multnomah County continues to be at 11.6%, ranking it the 24th worst in the nation among major metropolitan areas. As the City has said, "The challenge in the next decade will be to ensure that Portland is an affordable city to all of its residents."⁴⁷

TABLE 35: PERCENTAGE OF MEDIAN INCOME: FY 2004							
Household Size	30%	50%	60%	80%	100%	120%	150%
1	14,265	23,775	28,530	38,040	47,550	57,060	71,325
2	16,290	27,150	32,580	43,440	54,300	65,160	81,450
3	18,330	30,550	36,660	48,880	61,100	73,320	91,650
4	20,370	33,950	40,740	54,320	67,900	81,480	101,850

⁴⁵ A household has a "housing cost burden" if it spends 30 percent or more of its income on housing costs. A household has a "severe housing cost burden" if it spends 50 percent or more of its income on housing. Housing costs include mortgage payments, real estate taxes, home related insurance costs, utilities and fuel.

⁴⁶ Anderson & Pietka, Managing Neighborhood Change in a Hot Market: Portland's Approaches. Much of this section relies on the text of this report.

⁴⁷ Ibid, p.3.

5	22,005	36,675	44,010	58,680	73,350	88,020	110,025
6	23,625	39,375	47,250	63,000	78,750	94,500	118,125
7	25,260	42,100	50,520	67,360	84,200	101,040	126,300
8	26,895	44,825	53,790	71,720	89,650	107,580	134,475

Based on the HUD Portland Area Median Income as of February 9, 2004:
 \$67,900 for a family of four.
 Source: U.S. Dept. of HUD

TABLE 36: 2004 HOUSING AFFORDABILITY: MAXIMUM MONTHLY RENT INCLUDING UTILITIES BY MEDIAN FAMILY INCOME WITH A HOUSING BURDEN OF 30%

Bedrooms	Household Size	30%	50%	60%	80%	100%	120%	150%
Group Home	0.75	268	446	535	714	892	1,070	1,338
0	1	357	595	713	951	1,189	1,427	1,784
1	1.5	382	637	764	1,018	1,273	1,528	1,910
2	3	458	764	917	1,222	1,528	1,834	2,292
3	4.5	530	883	1,060	1,413	1,766	2,119	2,649
4	6	591	985	1,181	1,575	1,969	2,363	2,954
5	7.5	652	1,087	1,304	1,738	2,173	2,608	3,260

Source: Blue Ribbon Committee on Housing Resource Development
 Sample Calculation: Median Income for a family of 3: \$61,100
 Monthly Income: \$5,092
 30% Housing Burden: \$1,528

SECTION 8 VOUCHER DEMOGRAPHICS

Section 8 vouchers are one of the most widely used public housing subsidy mechanisms. The voucher allows the holder to find housing on his or her own and then use the voucher as a cash equivalent to provide the larger part of the rent to the landlord. Voucher payments are set at the fair market rent in the area at the time.⁴⁸ Moreover, there is very little paperwork involved for the landlord. Notwithstanding that the voucher enables the landlord to ensure payment of the larger part of the monthly rent on an ongoing basis, some landlords have and still refuse to rent to people with vouchers. This has created a problem for voucher holders, many who are families, who are searching for affordable housing, since if the vouchers do not find a home within a certain period they have to be returned to the issuer and the low income family is then back to square one.

⁴⁸ Interview with Rose Bak, the director of HAP's Section 8 program.

In terms of the demographics of the section 8 vouchers, Maps 13 and 63 show the spatial distribution of the vouchers. Note on Map 63 the heavy concentration of vouchers in the Northern neighborhoods.⁴⁹ Additional data needs to be acquired on the 'success rates' of voucher holders and the factors that control 'success.'⁵⁰

MOBILE HOME PARKS

There are 124 mobile home parks in Multnomah County. Residents of these homes are disproportionately seniors and/or people with disabilities. Manufactured homes are the only homeownership opportunity available to a significant subgroup of low-income families due to low home purchase, land rental, and maintenance costs. See Maps 24 and 25.

However, the institutional arrangements surrounding the rental of the lot from the park owner create significant risk for the low-income mobile home owner. The mobile home owner has only a limited tenancy and can be evicted by the owner of the park on relatively short notice, notwithstanding the semi-permanency of the mobile home owner's investment in its home. Since the rise in housing prices has created demand for building sites, a growing number of mobile home park owners have elected in recent years to evict their tenants and sell off their land for development.

A mobile-home owner facing eviction from a mobile home park will not find it easy to relocate. Some mobile homes are unmovable in an engineering sense because of their age and condition. Even a movable home may not be easily resituated. Owners of newer mobile home parks may not accept older or single-wide mobile homes in their parks, for commercial and aesthetic reasons..

Thus, when a park is sold or converted, the manufactured homeowners may find that their investments in their homes is lost when they must abandon their trailers, or see them repossessed.

State law in this area provides limited protections to mobile home owners. If a park is to be closed and the residents evicted the landlord must give the residents one year's notice before eviction, ORS 90.630(5)(a). Yet, somewhat cryptically, the statute also provides that the landlord may only evict the residents if the park is to be converted to a "different use." ORS 90.630(5). This provision was meant to deal with situations where the landlord wanted to be able to charge higher rents so he determined to evict all the old residents with their old mobile homes and substitute new residents with new mobile homes. One of the questions that has arisen and is now before the courts is whether a change from a manufactured home park to a manufactured home subdivision after a general eviction is a "change in use," since the zoning didn't change, nor did the type of housing.

⁴⁹ Map 63 is drawn from, Portland City Auditor, A Review of the Efforts and Accomplishments of City Housing Programs: 1996-2000 (June 2002), p.57.

⁵⁰ See, for example, HUD research on this topic in HUD, Study on Section 8 Voucher Success Rates: Volume I, Quantitative Study of Success Rates in Metropolitan Areas.

Given the large number of mobile home parks in Multnomah County, and the disproportional number of older residents and residents with disabilities that reside in them, measures at the local level to discourage conversions may be in order, if not pre-empted by state law.

LEAD PAINT, OLDER HOMES AND CHILDREN

One of the primary impediments to housing choice for families with children involves the presence of lead paint in the physical housing stock within a community. Lead based paint hazards present serious health risks to children under the age of 6. Multnomah County realtors have told us anecdotally that many landlords will not rent to households with young children because of fear of liability. Liability might arise because of the dangers from deteriorated lead based paint.

Moreover, state law requires that lead paint hazards in homeowner and rental units occupied by children under 6 be removed. Given the often-high cost of lead abatement, a significant number of Multnomah County landlords refuse to rent to families with young children, even though it is illegal to discriminate on that basis.

Housing units built prior to 1978 have a high probability of having lead paint. Given the age of Multnomah County's housing stock, it is likely that lead-based paint (LBP) hazards exist in a significant number of units. According to the 2000 Census, 82% of Multnomah County homeownership units and 77% of the county's rental units were built before 1979.

Using HUD estimates of the incidence of lead based paint by year of construction,⁵¹ we estimate that 38% of all Multnomah County homeownership units, and 30% of all Multnomah County rental units have LBP hazards (peeling paint, lead dust or lead in the soil). Significant numbers of both homeownership and rental units exist with lead paint throughout each of the study communities within Multnomah County. The dangers of deteriorated lead based paint are not insubstantial in Multnomah County. Again using HUD estimates of the incidence of lead based paint by year of construction, we estimate that 28% of all Multnomah County homeownership units, and 16% of all Multnomah County rental units have deteriorated LBP hazards in the units.

Multnomah County's old homes will continue to get older, and lead painted surfaces will naturally deteriorate or generate lead dust from normal wear and tear. These old homes will also need maintenance and renovation to continue to house families. Despite all this, landlords may not refuse to rent to families with children because of the presence of lead paint. Discrimination against families in rental housing is against the law. The federal Fair Housing Act says that you cannot refuse to rent to someone because they have kids. There is no lead paint exemption to the Fair Housing law.

⁵¹ HUD National Survey of Lead and Allergens in Housing, Final Report, Volume I, page 4-7 and A-8. (2000)

TABLE 37: AGE OF HOUSING STOCK AND ESTIMATED LEAD BASED PAINT (LBP) INCIDENCE (2000) (OWNER OCCUPIED UNITS)

	Multnomah County, Oregon			Fairview			Gresham			Maywood Park			Portland			Troutdale			Wood Village		
	Total	% of occup' d units	# with Lead Paint	Total	% of occup' d units	# with Lead Paint	Total	% of occup' d units	# with Lead Paint	Total	% of occup' d units	# with Lead Paint	Total	% of occup' d units	# with Lead Paint	Total	% of occup' d units	# with Lead Paint	Total	% of occup' d units	# with Lead Paint
Built 1999 to March 2000	1,768	1%	0	123	7%	0	405	2%	0	0	0%	0	1,114	1%	0	33	1%	0	5	1%	0
Built 1995 to 1998	8,433	5%	0	586	34%	0	1,538	8%	0	4	1%	0	5,092	4%	0	848	24%	0	35	5%	0
Built 1990 to 1994	7,231	5%	0	156	9%	0	1,514	8%	0	2	1%	0	4,092	3%	0	786	23%	0	62	9%	0
Built 1980 to 1989	11,273	7%	451	293	17%	12	2,881	16%	115	0	0%	0	6,334	5%	253	659	19%	26	167	23%	7
Built 1970 to 1979	19,054	12%	1,715	262	15%	24	6,287	35%	566	4	1%	0	10,223	8%	920	856	25%	77	231	32%	21
Built 1960 to 1969	14,849	10%	1,336	117	7%	11	2,771	15%	249	5	2%	0	11,118	9%	1,001	72	2%	6	75	10%	7
Built 1950 to 1959	24,008	16%	10,804	56	3%	25	1,776	10%	799	18	6%	8	21,531	17%	9,689	24	1%	11	38	5%	17
Built 1940 to 1949	17,130	11%	7,709	58	3%	26	520	3%	234	147	52%	66	15,860	13%	7,137	27	1%	12	100	14%	45
Built 1939 or earlier	51,038	33%	37,258	55	3%		524	3%	383	102	36%	74	49,418	40%	36,075	159	5%	116	8	1%	6
Owner occupied:	154,784	100%		1,706	100%		18,216	100%		282	100%		124,782	100%		3,464	100%		721	100%	

TABLE 38: AGE OF HOUSING STOCK AND ESTIMATED LEAD BASED PAINT (LBP) INCIDENCE (2000) (RENTER OCCUPIED UNITS)

	Multnomah County, Oregon			Fairview			Gresham			Maywood Park			Portland			Troutdale			Wood Village		
	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint
Built 1999 to March 2000	2,606	2%	0	31	3%	0	475	3%	0	0	0%	0	2,087	2%	0	16	1%	0	0	0%	0
Built 1995 to 1998	8,807	8%	0	406	35%	0	2,271	15%	0	2	8%	0	5,740	6%	0	385	32%	0	0	0%	0
Built 1990 to 1994	6,131	5%	0	340	29%	0	2,181	14%	0	0	0%	0	3,361	3%	0	229	19%	0	16	6%	0
Built 1980 to 1989	9,329	8%	373	57	5%	2	2,419	16%	97	0	0%	0	6,663	7%	267	115	9%	5	28	11%	1
Built 1970 to 1979	21,938	19%	1,974	181	16%	16	4,596	30%	414	0	0%	0	16,743	17%	1,507	271	22%	24	95	38%	9
Built 1960 to 1969	16,572	14%	1,491	68	6%	6	1,809	12%	163	2	8%	0	14,514	15%	1,306	87	7%	8	63	25%	6
Built 1950 to 1959	13,132	11%	5,909	16	1%	7	720	5%	324	3	13%	1	12,224	12%	5,501	48	4%	22	13	5%	6
Built 1940 to 1949	10,775	9%	4,849	43	4%	19	326	2%	147	13	54%	6	10,211	10%	4,595	25	2%	11	37	15%	17
Built 1939 or earlier	28,024	24%	20,458	18	2%	13	285	2%	208	4	17%	3	27,427	28%	20,022	36	3%	26	0	0%	0
Renter occupied	117,314	100%		1,160	100%		15,082	100%		24	100%		98,970	100%		1,212	100%		252	100%	
Total:	272,098			2,866			33,298			306			223,752			4,676			973		

TABLE 39: AGE OF HOUSING STOCK AND ESTIMATED DETERIORATED LEAD BASED PAINT (LBP) INCIDENCE (2000) (OWNER OCCUPIED UNITS)

	Multnomah County, Oregon			Fairview			Gresham			Maywood Park			Portland			Troutdale			Wood Village		
	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint
Built 1999 to March 2000	1,768	1%	0	123	7%	0	405	2%	0	0	0%	0	1,114	1%	0	33	1%	0	5	1%	0
Built 1995 to 1998	8,433	5%	0	586	34%	0	1,538	8%	0	4	1%	0	5,092	4%	0	848	24%	0	35	5%	0
Built 1990 to 1994	7,231	5%	0	156	9%	0	1,514	8%	0	2	1%	0	4,092	3%	0	786	23%	0	62	9%	0
Built 1980 to 1989	11,273	7%	0	293	17%	0	2,881	16%	0	0	0%	0	6,334	5%	0	659	19%	0	167	23%	0
Built 1970 to 1979	19,054	12%	572	262	15%	8	6,287	35%	189	4	1%	0	10,223	8%	307	856	25%	26	231	32%	7
Built 1960 to 1969	14,849	10%	445	117	7%	4	2,771	15%	83	5	2%	0	11,118	9%	334	72	2%	2	75	10%	2
Built 1950 to 1959	24,008	16%	7,683	56	3%	18	1,776	10%	568	18	6%	6	21,531	17%	6,890	24	1%	8	38	5%	12
Built 1940 to 1949	17,130	11%	5,482	58	3%	19	520	3%	166	147	52%	47	15,860	13%	5,075	27	1%	9	100	14%	32
Built 1939 or earlier	51,038	33%	28,581	55	3%	31	524	3%	293	102	36%	57	49,418	40%	27,674	159	5%	89	8	1%	4
Owner occupied:	154,784	100%		1,706	100%		18,216	100%		282	100%		124,782	100%		3,464	100%		721	100%	

TABLE 40: AGE OF HOUSING STOCK AND ESTIMATED DETERIORATED LEAD BASED PAINT (LBP) INCIDENCE (2000) (RENTER OCCUPIED UNITS)

	Multnomah County, Oregon			Fairview			Gresham			Maywood Park			Portland			Troutdale			Wood Village		
	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint	Total	% of occup'd units	# with Lead Paint
Built 1999 to March 2000	2,606	2%	0	31	3%	0	475	3%	0	0	0%	0	2,087	2%	0	16	1%	0	0	0%	0
Built 1995 to 1998	8,807	8%	0	406	35%	0	2,271	15%	0	2	8%	0	5,740	6%	0	385	32%	0	0	0%	0
Built 1990 to 1994	6,131	5%	0	340	29%	0	2,181	14%	0	0	0%	0	3,361	3%	0	229	19%	0	16	6%	0
Built 1980 to 1989	9,329	8%	0	57	5%	0	2,419	16%	0	0	0%	0	6,663	7%	0	115	9%	0	28	11%	0
Built 1970 to 1979	21,938	19%	658	181	16%	5	4,596	30%	138	0	0%	0	16,743	17%	502	271	22%	8	95	38%	3
Built 1960 to 1969	16,572	14%	497	68	6%	2	1,809	12%	54	2	8%	0	14,514	15%	435	87	7%	3	63	25%	2
Built 1950 to 1959	13,132	11%	4,202	16	1%	5	720	5%	230	3	13%	1	12,224	12%	3,912	48	4%	15	13	5%	4
Built 1940 to 1949	10,775	9%	3,448	43	4%	14	326	2%	104	13	54%	4	10,211	10%	3,268	25	2%	8	37	15%	12
Built 1939 or earlier	28,024	24%	15,693	18	2%	10	285	2%	160	4	17%	2	27,427	28%	15,359	36	3%	20	0	0%	0
Renter occupied:	117,314	100%		1,160	100%		15,082	100%		24	100%		98,970	100%		1,212	100%		252	100%	
Total:	272,098			2,866			33,298			306			223,752			4,676			973		

LARGE FAMILIES

The housing stock of Multnomah County does not provide adequate housing choices for larger households. There is a substantial population of larger households in Multnomah County. Nearly 10% of all homeowner households, and more than 7% of all renter households in the county have five or more persons. Gresham, Troutdale and Wood Village have a higher incidence of large households than does the county as a whole. Fairview and Maywood have an incidence of larger households between 15% and 20%.

The size of the housing unit that should be made available can be derived from that which is typically made available. Most households do not choose to live in housing units that result in a “density” of more than 1.0 persons per room in Multnomah County. Indeed, most households choose to live in units with densities of less than 0.5 persons per room. As can be seen, 97% of owner-occupied units have fewer than 1.00 persons per room in the county as a whole, while 91% of renter occupied units do. More than three-quarters of owner-occupied units have fewer than 0.50 persons per room in the county as a whole, while more than 55% of renter-occupied units do. Fairview, Troutdale and Wood Village have a higher density than the county as a whole for both homeownership and rental units.

TABLE 41: TENURE BY HOUSEHOLD SIZE

HH Size	Owner							Renter				
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah County	Fairview	Gresham	Maywood Park	Portland
1-person	37,704	362	3,236	44	32,346	355	217	50,640	253	4,909	5	44,9
2-person	57,938	653	6,544	138	46,944	1,143	228	32,862	322	4,078	3	27,7
3-person	24,555	352	3,117	46	19,363	806	129	15,369	179	2,543	7	12,2
4-person	20,553	213	3,227	30	15,416	754	45	9,679	196	1,763	5	7,4
5-person	8,458	67	1,353	21	6,344	267	50	4,989	131	943	2	3,7
6-person	3,245	37	416	3	2,558	82	16	2,187	58	519	2	1,5
7+ person	2,331	22	323	0	1,811	57	36	1,588	21	327	0	1,1
Total:	154,784	1,706	18,216	282	124,782	3,464	721	117,314	1,160	15,082	24	98,9

SOURCE: Table H17 (2000 Census).

TABLE 42: HOUSEHOLD DENSITY BY TENURE (OCCUPIED HOUSING UNITS)

Occupants per room	Owner							Renter				
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah County	Fairview	Gresham	Maywood Park	Portland
0.50 or less	119,691	1,166	13,384	245	97,491	2,323	504	66,679	511	8,064	10	56,908
0.51 to 1.00	30,557	446	4,355	37	23,504	1,042	173	40,378	486	5,108	11	34,049
1.01 to 1.50	2,429	55	273	0	2,009	73	12	5,134	127	1,092	3	3,822
1.51 to 2.00	1,541	25	157	0	1,294	26	11	3,461	19	503	0	2,883
2.01 or more	566	14	47	0	484	0	21	1,662	17	315	0	1,308
Total	154,784	1,706	18,216	282	124,782	3,464	721	117,314	1,160	15,082	24	98,970

SOURCE: Table H20 (2000 Census)

TABLE 43: HOUSEHOLD DENSITY BY TENURE BY AGE OF OWNER OR RENTER (OCCUPIED

Occupants per room by age of householder	Owner							Renter			
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah County	Fairview	Gresham	Maywood Park
25 to 34 years:	20,531	275	2,054	18	17,114	597	73	36,805	435	4,602	7
1.00 or less	19,285	256	1,911	18	16,079	555	73	32,726	350	3,689	6
1.01 to 1.50	676	15	74	0	566	21	0	2,085	77	549	1
1.51 or more	570	4	69	0	469	21	0	1,994	8	364	0
% 1.00 or less	94%	93%	93%	100%	94%	93%	100%	89%	80%	80%	86%
35 to 44 years:	35,068	357	4,449	50	27,895	1,182	219	24,140	304	3,121	7
1.00 or less	33,529	342	4,263	50	26,613	1,156	198	21,527	259	2,642	7
1.01 to 1.50	818	8	110	0	674	26	0	1,363	25	258	0
1.51 or more	721	7	76	0	608	0	21	1,250	20	221	0
% 1.00 or less	96%	96%	96%	100%	95%	98%	90%	89%	85%	85%	100%
45 to 54 years:	40,660	470	5,100	77	32,017	987	139	17,988	131	2,037	5
1.00 or less	39,665	435	5,016	77	31,186	960	128	16,895	122	1,897	3
1.01 to 1.50	553	14	53	0	464	22	0	586	9	61	2
1.51 or more	442	21	31	0	367	5	11	507	0	79	0
% 1.00 or less	98%	93%	98%	100%	97%	97%	92%	94%	93%	93%	60%
55 to 64 years:	22,441	232	2,983	58	17,524	382	103	8,390	74	1,023	0
1.00 or less	22,064	232	2,952	58	17,187	378	103	7,999	74	987	0
1.01 to 1.50	146	0	20	0	122	4	0	171	0	30	0
1.51 or more	231	0	11	0	215	0	0	220	0	6	0
% 1.00 or less	98%	100%	99%	100%	98%	99%	100%	95%	100%	96%	#DIV/0!
Total	154,784	1,706	18,216	282	124,782	3,464	721	117,314	1,160	15,082	24

Source: Table H21 (2000 Census).

TABLE 44: HOUSING UNITS BY NUMBER OF ROOMS (OCCUPIED HOUSING UNITS)

	Owner							Renter				
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah County	Fairview	Gresham	Maywood Park	Portland
1 room	725	57	56	0	572	0	0	11,832	16	526	0	1
2 rooms	2,277	124	109	0	1,901	39	23	17,430	115	1,875	1	1
3 rooms	6,944	98	650	2	5,850	170	38	23,307	109	2,505	4	2
4 rooms	14,753	152	1,074	3	12,911	103	91	29,342	403	4,906	1	2
5 rooms	29,420	292	2,697	38	24,798	525	199	19,620	361	3,617	3	1
6 rooms	34,274	375	4,467	66	27,286	999	220	8,598	103	1,021	5	7
7 rooms	27,683	286	4,317	63	21,156	849	65	3,775	25	370	8	3
8 rooms	18,788	158	2,542	53	14,799	471	23	1,941	21	149	0	1
9+ rooms	19,920	164	2,304	57	15,509	308	62	1,469	7	113	2	1
Total	154,784	1,706	18,216	282	124,782	3,464	721	117,314	1,160	15,082	24	9

SOURCE: Table H26 (2000 Census)

There appears to be a sufficient numbers of single-family units large enough to house larger households in Multnomah County. While there are roughly 35,000 households with four or more people in Multnomah County, there are more than 100,000 homeownership units with six or more rooms. While there are 14,000 households with five or more persons, there are nearly 40,000 housing units with eight or more rooms.

In contrast, the number of rental units does not appear to be adequate to satisfy the number of larger households. While there are roughly 18,000 renter households with four or more persons, there are only 16,000 rental units with six or more rooms. While there are 8,800 renter households with five or more persons, there are only 3,400 rental units with eight or more rooms. Even if all units of appropriate size are assumed to be rented by households needing that much room (i.e., no household rents a unit that is “too large” for them), there is a scarcity of appropriately sized rental units.

HOUSING CHOICE FOR AGING HOUSEHOLDS

There is a substantial aging population in Multnomah County. More than 20% of all non-family households and nearly 15% of all family households are age 65 and over. Aging households tend to only have one or two members, and tend to be on fixed incomes.

The vast majority of older residents of Multnomah County live in single family homes. More than 24,000 of the roughly 26,000 householders age 75 or older (88%) live in single family homes. Nearly 15,600 of the roughly 21,800 householders age 65 to 74 (89%) live in single family homes. Of the combined 33,000 householders age 65 or older living in single family homes, 31,000 (93%) live in ownership units.

Seniors who are “aging in place” in their own home may require assistance to remain in the house due to the cost of repairs and their decreasing ability to maintain the property.

Over half of older Oregon renters spend over 35 percent of their income on rent, usually in an apartment. Because of the rent burden, seniors may be in the position of having to choose between paying rent and purchasing food, utilities, and, in some cases, medications. In recent years, increased rent, utility costs, prescription costs, and medical costs have squeezed seniors ever more tightly. The 2005-2010 Consolidated Plan identified a shortage of affordable housing restricted to seniors, leaving low-income aging renter households to compete for the County’s limited supply of affordable small units.

TABLE 45: HOUSEHOLD TYPE BY AGE OF HOUSEHOLDERS(HOUSEHOLDS)

Age of Householder	Family Households							Non-Family Households						
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village
65 to 74 years	12,134	115	1,434	30	9,862	166	41	10,084	97	1,163	6	8,535	31	49
75 to 84 years	8,319	91	930	21	6,932	63	14	10,690	60	1,101	10	9,219	67	0
85 years and over	2,068	0	192	10	1,750	0	37	4,821	12	525	2	4,187	0	0
Totals	153,832	1,975	22,912	229	119,812	3,704	662	118,524	869	10,495	65	104,175	928	349
Source: Table P13 (2000 Census).														

TABLE 46: TENURE BY AGE OF HOUSEHOLDER AND SIZE OF HOUSEHOLD(OCCUPIED HOUSING UNITS)

Age of HH'dr by Size of HH	Owner							Renter						
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village
Totals	154,784	1,706	18,216	282	124,782	3,464	721	117,314	1,160	15,082	24	98,970	1,212	252
1-person household:	37,704	362	3,236	44	32,346	355	217	50,640	253	4,909	5	44,985	261	62
65 to 74 years	5,229	46	538	5	4,356	30	60	3,951	23	460	0	3,441	14	7
75 years and over	8,746	61	700	10	7,665	39	0	6,099	0	830	2	5,208	17	0
2+ person household	117,080	1,344	14,980	238	92,436	3,109	504	66,674	907	10,173	19	53,985	951	190
65 to 74 years	10,910	129	1,320	29	8,817	125	38	1,697	9	222	0	1,454	10	0
75 years and over	9,660	102	910	35	8,167	66	43	1,498	0	275	2	1,211	0	7
Source: Table HCT2 (2000 Census).														

TABLE 47: TENURE BY AGE OF HOUSEHOLDER AND TYPE OF DWELLING UNIT (OCCUPIED HOUSING UNITS)

Age of HH'r and Type of Unit	Owner							Renter						
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village
65 to 74 years	16,139	175	1,858	34	13,173	155	98	5,648	32	682	0	4,895	24	7
1 detached/attached	14,426	61	1,544	34	12,072	101	70	1,182	0	115	0	1,059	0	0
2 to 4	409	0	88	0	287	7	0	862	8	119	0	719	10	0
5 to 19	192	0	18	0	156	0	0	1,095	8	192	0	871	14	7
20 to 49	123	0	0	0	123	0	0	709	0	62	0	658	0	0
50 or more	129	0	0	0	129	0	0	1,762	0	186	0	1,574	0	0
Mobile home	791	93	208	0	375	40	28	38	16	8	0	14	0	0
Boat, RV, van, etc.	69	21	0	0	31	7	0	0	0	0	0	0	0	0
75 years and over	18,406	163	1,610	45	15,832	105	43	7,597	0	1,105	4	6,419	17	7
1 detached/attached	16,265	54	1,230	45	14,302	70	15	1,092	0	112	4	926	9	0
2 to 4	405	0	55	0	350	0	0	875	0	231	0	647	0	0
5 to 19	204	0	40	0	144	0	0	1,162	0	164	0	990	8	0
20 to 49	186	0	11	0	173	0	0	1,103	0	180	0	931	0	0
50 or more	505	0	19	0	460	0	0	3,275	0	392	0	2,883	0	0
Mobile home	807	87	255	0	391	35	28	90	0	26	0	42	0	7
Boat, RV, van, etc.	34	22	0	0	12	0	0	0	0	0	0	0	0	0
Total	154,784	1,706	18,216	282	124,782	3,464	721	117,314	1,160	15,082	24	98,970	1,212	252

Source: Table HCT4 (2000 Census).

TABLE 48: TENURE BY ROOMS (OCCUPIED HOUSING UNITS)

	Multnomah County, Oregon		Fairview		Gresham		Maywood Park		Portland		Troutdale		Wood V
	No.	Pct	No.	Pct	No.	Pct	No.	Pct	No.	Pct	No.	Pct	
Owner occupied													
1 room	725	0.5%	57	3.3%	56	0.3%	0	0.0%	572	0.5%	0	0.0%	0
2 rooms	2,277	1.5%	124	7.3%	109	0.6%	0	0.0%	1,901	1.5%	39	1.1%	23
3 rooms	6,944	4.5%	98	5.7%	650	3.6%	2	0.7%	5,850	4.7%	170	4.9%	38
4 rooms	14,753	9.5%	152	8.9%	1,074	5.9%	3	1.1%	12,911	10.3%	103	3.0%	91
5 rooms	29,420	19.0%	292	17.1%	2,697	14.8%	38	13.5%	24,798	19.9%	525	15.2%	199
6 rooms	34,274	22.1%	375	22.0%	4,467	24.5%	66	23.4%	27,286	21.9%	999	28.8%	220
7 rooms	27,683	17.9%	286	16.8%	4,317	23.7%	63	22.3%	21,156	17.0%	849	24.5%	65
8 rooms	18,788	12.1%	158	9.3%	2,542	14.0%	53	18.8%	14,799	11.9%	471	13.6%	23
9+ rooms	19,920	12.9%	164	9.6%	2,304	12.6%	57	20.2%	15,509	12.4%	308	8.9%	62
Totals	154,784	100%	1,706	100%	18,216	100%	282	100%	124,782	100%	3,464	100%	721
Renter occupied													
1 room	11,832	10.1%	16	1.4%	526	3.5%	0	0.0%	11,259	11.4%	9	0.7%	0
2 rooms	17,430	14.9%	115	9.9%	1,875	12.4%	1	4.2%	15,343	15.5%	63	5.2%	20
3 rooms	23,307	19.9%	109	9.4%	2,505	16.6%	4	16.7%	20,449	20.7%	163	13.4%	18
4 rooms	29,342	25.0%	403	34.7%	4,906	32.5%	1	4.2%	23,537	23.8%	398	32.8%	93
5 rooms	19,620	16.7%	361	31.1%	3,617	24.0%	3	12.5%	15,012	15.2%	318	26.2%	93
6 rooms	8,598	7.3%	103	8.9%	1,021	6.8%	5	20.8%	7,120	7.2%	174	14.4%	22
7 rooms	3,775	3.2%	25	2.2%	370	2.5%	8	33.3%	3,275	3.3%	53	4.4%	6
8 rooms	1,941	1.7%	21	1.8%	149	1.0%	0	0.0%	1,706	1.7%	6	0.5%	0
9+ rooms	1,469	1.3%	7	0.6%	113	0.7%	2	8.3%	1,269	1.3%	28	2.3%	0
Totals	117,314	100%	1,160	100%	15,082	100%	24	100%	98,970	100%	1,212	100%	252

SOURCE: Table H26 (2000 Census).

TABLE 49: TENURE BY BEDROOMS (OCCUPIED HOUSING UNITS)

	Multnomah County		Fairview		Gresham		Maywood Park		Portland		Troutdale		Wood V
	No.	Pct.	No.	Pct.	No.	Pct.	No.	Pct.	No.	Pct.	No.	Pct.	
Owner-Occupied													
No bedroom	1,072	1%	57	3%	103	1%	0	0%	856	1%	0	0%	8
1 bedroom	7,649	5%	200	12%	457	3%	2	1%	6,597	5%	101	3%	22
2 bedrooms	39,130	25%	296	17%	2,315	13%	53	19%	34,854	28%	273	8%	288
3 bedrooms	71,520	46%	873	51%	10,887	60%	110	39%	54,763	44%	2,385	69%	339
4	28,012	18%	245	14%	3,801	21%	104	37%	21,757	17%	647	19%	48

bedrooms													
5+	7,401	5%	35	2%	653	4%	13	5%	5,955	5%	58	2%	16
bedrooms													
Total	154,784	100%	1,706	100%	18,216	100%	282	100%	124,782	100%	3,464	100%	721
Renter-Occupied													
No	15,499	13%	25	2%	767	5%	0	0%	14,647	15%	9	1%	14
bedroom													
1 bedroom	37,673	32%	190	16%	4,106	27%	3	13%	33,131	33%	193	16%	13
2	43,772	37%	619	53%	7,427	49%	9	38%	34,744	35%	567	47%	175
bedrooms													
3	16,360	14%	311	27%	2,501	17%	8	33%	12,846	13%	424	35%	42
bedrooms													
4	3,034	3%	15	1%	220	1%	2	8%	2,715	3%	13	1%	8
bedrooms													
5+	976	1%	0	0%	61	0%	2	8%	887	1%	6	0%	0
bedrooms													
Total	117,314	100%	1,160	100%	15,082	100%	24	100%	98,970	100%	1,212	100%	252
Source: Table H42 (2000 Census).													

LINGUISTIC ISOLATION AND HOUSING CHOICE

The linguistic isolation of Hispanic households in Multnomah county represents a barrier to fair housing choice. According to the U.S. Census Bureau, a “linguistically isolated household” “is one in which no member 14 years old and over (1) speaks English, or (2) speaks a non-English language and speaks English ‘very well.’” “In other words,” the census bureau says, “all members 14 years old and over have at least some difficulty with English.”⁵³

There is without question a growing Hispanic population in the Portland-Vancouver MSA. According to the SOCDS census data output, the total Hispanic population in the MSA has grown from 26,544 in 1980 to 49,344 in 1990 and 142,444 in 2000. The proportion of the population comprised of Hispanics has grown from 2.0% in the MSA in 1980 to 7.4% in 2000. The growth in the Hispanic population has been slightly faster outside the central city.

The growth in the Hispanic population is particularly significant because, while Hispanics are not the only non-English speaking population, they are one of the primary sources of linguistic isolation in Multnomah County. As the table below documents, more than one-quarter of all Hispanic households in Multnomah County are linguistically isolated. The table further shows that a virtually identical proportion of Asian and Pacific Island households are linguistically isolated, even though the absolute numbers of households involved are somewhat, but not significantly, smaller.

⁵³ U.S. Census Bureau, Note to Table P20, “Household Language by Linguistic Isolation” (2000 Census).

TABLE 50: HISPANIC POPULATION IN PORTLAND/VANCOUVER MSA BY MSA, CENTRAL CITY, AND SUBURBS			
	Portland/Vancouver MSA	Central City (Portland)	Suburbs /a/
Hispanic Population			
1980	26,544	7,541	18,287
1990	49,344	13,125	34,651
2000	142,444	36,058	97,351
Hispanic Population as Percent of Total Population			
1980	2.0%	2.1%	2.0%
1990	3.3%	3.0%	3.4%
2000	7.4%	6.8%	7.8%

NOTES: /a/ Suburb data is defined as the total for the PMSA less the same of data for the cities of Portland and Vancouver.

TABLE 51: HOUSEHOLD LANGUAGE BY LINGUISTIC ISOLATION (HOUSEHOLDS) MULTNOMAH COUNTY (AND COMPONENT COMMUNITIES) OREGON							
	Multnomah County	Fairview	Gresham	Maywood Park	Portland	Troutdale	Wood Village
Total	272,356	2,844	33,407	294	223,987	4,632	1,011
English	228,085	2,315	27,708	270	187,219	4,124	847
Spanish	16,425	288	3,069	13	12,508	221	79
Linguistically isolated	4,203	96	1,000	0	3,052	38	13
Percent linguistically isolated	26%	33%	33%	0%	24%	17%	16%
Other Indo-European languages	14,037	65	1,549	7	12,022	116	57
Linguistically isolated	3,123	13	278	0	2,813	0	6
Percent linguistically isolated	22%	20%	18%	0%	23%	0%	11%
Asian and Pacific Island languages	11,685	137	891	3	10,357	171	28
Linguistically isolated	4,014	34	196	1	3,768	16	0
Percent linguistically isolated	34%	25%	22%	33%	36%	9%	0%
Other languages	2,124	39	190	1	1,881	0	0
Linguistically isolated	471	0	47	0	424	0	0

Percent linguistically isolated	22%	0%	25%	0%	23%	N/A	N/A
Source: Table P20, 2000 Census							

As the table below documents, forty percent and more of all adult Hispanics in Multnomah County (OR) in 2000 have difficulty in speaking English. Nearly one-of-three of all Hispanics age 18 to 64 speak English either “not well” or “not at all.” More than one-of-five of all Hispanics age 65 and older speak English either “not well” or “not at all.”

TABLE 52: AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH HISPANICS AND LATINOS, MULTNOMAH COUNTY, OREGON							
	Speaks Another Language						Pct Speaks English w/ Difficulty /a/
	Speaks Only English	Total Speaks Other Language	Speaks English “Very Well”	Speaks English “Well”	Speaks English “Not Well”	Speaks English “Not at All”	
18 to 64 years old	7,750	23,343	7,082	5,386	7,189	3,686	35.0%
65 years old and over	281	787	400	153	121	113	21.9%
<i>NOTES: /a/ The sum of speak English “Not Well” and speak English “Not at All” divided by total population in age group.</i>							
<i>Source: Table PCT62H, 2000 Census.</i>							

Linguistic isolation poses a particular problem in the ability of a household to search for and retain housing. Amongst the impediments to fair housing choice that are associated with linguistic isolation are:

1. The lack of advertising and/or marketing in a language understandable to all.
2. The lack of an ability to read and understand important documents such as mortgage applications, credit applications, and leases.
3. The lack of an ability to participate in housing assistance programs.
4. The lack of an ability to report housing problems, whether to private property owners or to public officials.
5. The lack of an ability to access information about fair housing rights.

PERSONS WITH DISABILITIES AND HOUSING CHOICE

Low-income people with disabilities face substantial barriers to housing choice in Multnomah County. According to the federal Social Security Administration (SSA), in December 2004, 15,496 Multnomah County residents received an average Supplemental Security Income (SSI) payment of \$432 (\$5,184 annually).⁵⁴ On this income, just over 50% of the federal poverty level, there is a very limited supply of housing that they can afford.

There can be little question but that the fundamental problem facing SSI recipients in Multnomah County, as elsewhere, is their low income. The table below shows where average SSI benefits in Multnomah County fall as a proportion of the Federal Poverty Level for a one-person household for the past three years. As can be seen, SSI recipients live with incomes well below the Poverty. Households with these income levels will experience difficulty in finding housing in Multnomah County.

TABLE 56: AVERAGE SSI BENEFITS AS PERCENT OF FEDERAL POVERTY LEVEL (1-PERSON HH), 2002 – 2004, MULTNOMAH COUNTY			
	2002	2003	2004
SSI Benefit	\$5,199	\$5,148	\$5,184
100% Federal Poverty Level	\$8,860	\$8,980	\$9,180
SSI as Pct of FPL	59%	57%	56%
<i>NOTES: SSI benefits obtained from annual Social Security Administration publication, SSI Recipients by State and County. Federal Poverty Level published annually in the Federal Register by the U.S. Department of Health and Human Services.</i>			

To place the income difficulty of Multnomah County SSI recipients in a housing context, we have converted SSI benefits into an “SSI Wage.” The SSI Wage is calculated by dividing the annual SSI benefit by 2,080 hours (40 hours/week x 52 weeks/year).⁵⁶ We have compared this “SSI Wage” to the “Housing Wage” for Multnomah County.⁵⁷ A

⁵⁴ Social Security Administration, SSI Recipients by State and County, 2003, Table 3 (December 2003).

⁵⁶ This is the accepted mechanism used to calculate the housing affordability impacts of SSI benefits. See, Ann O’Hara and Emily Miller (May 2000). Priced Out in 2000: The Crisis Continues, Technical Assistance Collaborative: Boston (MA).

⁵⁷ A county-by-county housing wage is presented each year by the National Low-Income Housing Coalition in its annual *Out of Reach* study (<http://www.nlihc.org>).

housing wage is the hourly wage necessary to afford the Fair Market Rent for a two-bedroom unit as calculated annually by the National Low-Income Housing Coalition. A Housing Wage is calculated for each county in the nation. As the table below shows, the SSI Wage is but a small fraction of that needed to rent an affordable housing unit in Multnomah County.⁵⁸ In December 2004, SSI benefits provided only 15.7% of the income needed to afford basic housing in the county.

TABLE 57: SSI BENEFITS AS PERCENT OF HOUSING WAGE FOR MULTNOMAH COUNTY			
	Dec-04	Dec-03	Dec-02
Avg monthly benefit /a/	\$433	\$429	\$432
Annual benefit	\$5,199	\$5,148	\$5,184
SSI Wage	\$2.50	\$2.48	\$2.49
Monthly housing wage /b/	\$13.79	\$13.59	\$13.18
SSI Benefit as pct of housing wage	15.70%	16.20%	16.40%
<i>Notes: /a/ Social Security Administration, SSI Recipients by State and County (annual). /b/ National Low-Income Housing Coalition, "Out of Reach: Why Everyday People Cannot Afford Housing" (annual).</i>			

Moreover, the table indicates that housing has, over the past three years, become less affordable to disabled persons in Multnomah County. While the SSI Wage was 16.4% of the Housing Wage SSI recipients in December 2002, it had fallen to only 15.7% of the Housing Wage by December 2004. Disabled residents of Multnomah County are falling further behind in their ability to find affordable housing in the county.

Because there are so many low-income people with disabilities in Multnomah County, providing an adequate supply of housing for them, linked to the services they need to succeed in housing, is a major policy issue. The HCDC addressed this issue in its Special Needs Report and Recommendations, issued July 2002. HCDC recently released a supplemental report, examining the housing and service needs of families with children where one or more of the adults is a person with a disability. This Families with Special Needs Reports will be presented to the Multnomah County Commission and the Portland City Council in Winter, 2005-06.

⁵⁸ A unit is "affordable" if the household need not spend more than 30% of its income for rent.

TABLE 58: SSI RECIPIENTS (2000 – 2003), MULTNOMAH COUNTY			
	2002	2003	2004
Aged	2,629	2,606	2,567
Blind and Disabled	12,991	13,110	12,929
Total	15,620	15,716	15,496
<i>NOTES: The Social Security Administration annually publishes the number of SSI recipients by county in its statistical report, SSI Recipients by State and County.</i>			

The barriers to addressing the lack of housing choice by disabled persons in Multnomah County are multi-fold:

1. The lack of adequate public housing facilities dedicated to disabled individuals.
2. The lack of multi-family housing production that includes new accessible units.
3. The failure to provide adequate in-home social services that would allow for, and promote, independent living.
4. The failure to provide adequate transportation services that would increase mobility and thus housing choice.
5. The failure to provide zoning and building code relief that would allow for, and facilitate, the siting and construction of group homes.

SECTION FOUR: MULTNOMAH COUNTY'S FAIR HOUSING PROFILE

INTRODUCTION

THE IMPACT OF UNDERREPORTING ON THE PROFILE.

Evidence suggests that fewer than one in five people whose civil rights to fair housing are violated pursue the matter. There are many reasons for this under-reporting.

- When a community, like the Muslims or Russian Orthodox, has experienced generalized bias, individual community members are reluctant to assert their rights and draw unwanted attention to themselves or their people.
- For members of some communities, such as the Asian and Native American communities, there is a cultural barrier to seeking help from the government.
- For renters, in a market with fairly high vacancy rates, it may be easier to just move on.
- Some individuals fear retaliation if they assert their rights. While it is against the law for a property owner or its agent to retaliate against an individual for pursuing a civil rights complaint, many tenants are not aware of this. Furthermore, it requires some sophistication (and, optimally, the assistance of counsel) to successfully assert the defense in the context of an eviction proceeding.

The consequence of rampant underreporting is that we do not have a full record of impediments to use as the basis for our analysis or our recommendations. We rely on the records of calls received by Oregon Legal Services and the Fair Housing Council, as well as the cases pursued by HUD and BOLI. The records are not kept with enough detail to allow us to eliminate duplicate calls, although we have made an effort to estimate duplication.

We relied to some degree on the community leaders we interviewed to flesh out the partial data.

THE ORGANIZATION OF THE FAIR HOUSING PROFILE

We have organized our analysis into a set of tables for ease of review.

Table 59 A presents the impediments to fair housing identified in this AI, grouped for ease of reference by protected class. Explanatory detail is provided in the first column to present a fuller picture of the impediment. Supporting documentation is in the endnotes.

The second column describes current strategies intended to address the impediment. Primarily, these are programs that the jurisdictions currently fund to address identified barriers. While these programs are effective, they have not been sufficient to address each barrier entirely, and we do not represent that, as a result of current efforts, every Multnomah County resident enjoys housing choice free of unlawful discrimination. For

example, programs may not be funded to scale, or may only be designed to address a part of the problem.

Over the next quarter, the Fair Housing Advisory Committee, with community input, will review the sufficiency of current efforts and develop new recommendations, as necessary, for strategies to address identified impediments and significant issues. The Housing and Community Development Commission will oversee this process.

Table 59 B presents other significant obstacles to housing choice. These are barriers that are beyond the reach of traditional fair housing law, that nonetheless restrict housing choice and contribute to the social and economic isolation of groups of people. These are classified by barrier. The first column provides explanatory detail. Supporting documentation is in the endnotes. And current efforts are summarized the in second column. Again, we do not represent that current efforts are adequate. We hope that the HCDC process will give rise to new strategies to address these significant concerns.

IMPEDIMENTS, SIGNIFICANT ISSUES AND EXPLANATORY DETAIL

TABLE 59A: IMPEDIMENTS WITH EXPLANATORY DETAIL

IDENTIFIED IMPEDIMENT #1: DISCRIMINATION ON THE BASIS OF MENTAL OR PHYSICAL DISABILITY	
Of complaints reported by fair housing advocacy groups, the greatest number were related to disability ¹ .	
EXPLANATORY DETAIL	RECOMMENDATIONS FOR CONTINUATION OF CURRENT EFFORTS AND/OR COMMENCEMENT OF NEW CORRECTIVE ACTIONS
	The jurisdictions fund several organizations to provide a wide variety of fair housing services ²
There are insufficient numbers of accessible units to meet demand. ³	All Planning Jurisdictions have building codes that comply with the design and construction requirements of the Fair Housing Act. Housing inspectors enforce compliance with these codes. The jurisdictions fund several organizations to modify existing dwellings to improve accessibility.
Even when an accessible unit is available and advertised, it will often have been leased to non-disabled tenants before a disabled person has had the chance to apply. There is no requirement that public or private property owners reserve or hold open accessible units, or seek referrals from agencies that provide services to people with disabilities ⁴ .	<i>HousingConnections.org</i> lists all accessible units to assist people with disabilities to find available accessible units, or to sign up on the wait list for those units.
There is a shortage of accessible units with 2 or more bedrooms. This makes it particularly difficult for families that include a person in a wheelchair to find housing ⁵ .	In RFP processes to select new development projects, Portland gives a preference for larger (2+ bedroom) units. However, many of Portland’s development dollars are spent preserving or rehabilitating older complexes, typically studio and one-bedroom units.

	<p>Development policy also implements FHA, ADA and 504 standards in all new construction projects.</p> <p>Zoning Code regulations: The Central City plan district regulations (in the Zoning Code) include floor area bonuses (more building bulk) for providing large units in certain districts. They are the:</p> <ul style="list-style-type: none"> Large dwelling unit bonus in the West End (larger than 750 square feet) and large household dwelling unit bonus and Large household dwelling unit bonus for units with two or more bedrooms in South Waterfront. <p>Residential buildings in these districts are likely to be high rise with elevators, which are conducive to being accessible.</p>
<p>Claims of discrimination based on gender identity are sometimes brought under the “disability” provisions of the fair housing law, because the plaintiffs are perceived as disabled, and because there is no protection available under federal law for transgender individuals.</p>	<p>OAR 839-006-0206⁶ provides that, while there is no duty to make reasonable accommodation to an individual based on his/her gender identity, all other protections of fair housing law apply.</p>
<p>The Fair Housing Act exempts new town home construction from accessibility requirements, and this is reflected in the local building code. Developers have been building a greater proportion of town homes due to lower cost and high demand. These new homes are not accessible⁷.</p>	<p>Proposed Zoning Code Amendments: The City of Portland has no preference for town house development over other kinds of developments. Townhouses and row houses can be accessible if parking does not occupy the ground floor of the units. The Portland Planning Bureau's Infill Design Code Amendment Project is aimed at fostering alternative development types to the standard row house with ground floor parking. These amendments facilitate rear-parking arrangements and courtyard oriented housing that lends itself to handicapped accessibility.</p> <p>PDC is requiring in some of the urban renewal development projects that one or more town home units are accessible. A</p>

	current example is the 122nd and Pardee Homeownership Development in the Lents URA. Challenges include ensuring neighborhood compatibility in design and limited funding in some of the older URAs.
Many of the homeless shelters run by the City and County are not accessible to people with motor disabilities, due to structural limitations affecting access, lack of accessible bathroom facilities, and failure to provide reasonable accommodation to homeless persons with disabilities ⁸ .	
Landlords are not always willing to modify policies or practices as “reasonable accommodation” to persons with disabilities. Note that 30% of disability related fair housing complaints are based on reasonable accommodation denials.	
There have been instances of neighborhood opposition to the development of special needs housing.	The City of Portland funds staffing at ONI to administer a siting assistance program that promotes the siting of special needs housing by providing the community education and dispute resolution services that affirmatively furthers fair housing for people with disabilities and other special needs.
Many units described as “accessible” do not have wheelchair accessible showers. The tenants must bear all costs of making a unit accessible. Note that 22% of disability related fair housing complaints are based on design-construction issues. ⁹	The Planning Jurisdictions support Unlimited Choices’ Adapt-a-Home, to provide low-cost accessibility accommodations.
Tenants with disabilities are vulnerable to 30-day “no-cause” evictions. Note that 21% of disability related fair housing complaints are based on eviction issues. This tool may be abused to remove disabled tenants whose appearance or behaviors are perceived to be offensive to	The Planning Jurisdictions fund The Fair Housing Council of Oregon and Oregon Legal Services to investigate and prosecute complaints of discrimination. A tenant who is a member of a protected class may choose to ignore the “no cause” eviction and remain in the property beyond

<p>other tenants or prospective tenants.</p> <p>This tool may also be abused to remove tenants who complain about unsafe or unhealthy conditions or asset their rights under federal, state, or local fair housing laws¹⁰.</p>	<p>the 30-day notice period. When served with a Forcible Entry and Detainer (FED), the tenant may fight the eviction by asserting as a defense that the eviction resulted from bias. This defense would shift the burden to the owner to show that the initial “no cause” eviction was not merely a pretext for discrimination. However, as a practical matter, few protected class members have the resources to obtain the assistance of counsel to challenge the eviction, or the sophistication to assert the defense <i>pro se</i>. Moreover, an unsuccessful defense can result in liability for court costs, attorney fees, as well as putting an eviction on one’s rental history. This is a significant risk, and many people who suffer discrimination decide that it is not worth the effort to challenge the initial 30-day ‘no cause’ notice.</p>
<p>Some persons with disabilities who want to live in the community are forced to live in more restrictive settings than they would prefer, due to the lack of adequate funding for services to support independent living. Federal, state, and county budget cuts to independent living services have stranded people with disabilities in nursing homes, assisted living facilities, adult foster care, and other institutional settings.</p>	
<p>IDENTIFIED IMPEDIMENT #2: DISCRIMINATION ON THE BASIS OF RACE, COLOR, AND/OR NATIONAL ORIGIN.</p> <p>Of complaints reported by fair housing advocacy groups, the second greatest number were related to race, color, and/or national origin¹¹.</p>	
<p>DOCUMENTATION</p>	<p>RECOMMENDATIONS FOR CONTINUATION OF CURRENT EFFORTS AND/OR COMMENCEMENT OF NEW CORRECTIVE ACTIONS</p>
<p>Refusal to rent. Note that 27% of race related fair housing complaints and 24% of national origin related complaints are based on refusal to rent.</p>	<p>The Planning Jurisdictions fund several organizations to provide a variety of fair housing services¹²</p>

<p>Tenants are subjected to different terms and conditions based on race or national origin. Note that 35% of race related fair housing complaints and 48% of national origin related complaints are based on refusal to rent.</p>	<p>The Planning Jurisdictions fund several organizations to provide a variety of fair housing services¹³</p>
<p>There is a significant minority homeownership gap, as documented in two reports issued in 2004 by the Housing and Community Development Commission's Home Ownership Advisory Committee (HOAC). The homeownership rate for whites in 2000 was 59%, while the rate for African Americans, Native Americans, and Hispanics averaged 34%. A key factor is the loan denial rate. Among white and minority households with like incomes, the loan denial rate is as much as twice as high for minority applicants¹⁴.</p>	<p>Portland City Council has adopted a goal of closing the Minority Homeownership Gap by 2015. City Council adopted a set of short-term strategies proposed by HOAC. However, limited funds are available for implementation.</p> <p>PDC is partnering with the City in this campaign.</p>
<p>People who do not have strong English language skills face barriers to housing, because key documents, including leases, policies, disclosures, statements of rules, and/or compliance forms are not typically available in languages other than English.</p>	<p>The Metro Multifamily Housing Association provides rental forms in Spanish and the Association is considering translating these forms into other languages. Any landlord or property manager may purchase these forms.</p>
<p>Cultural differences, including the lack of a common language, can impede landlord/tenant communication. The tenant may not receive clear instruction about the application process, or property rules. The landlord's ability resolve differences, and facilitate tenant disputes is diminished¹⁵.</p>	<p>The Planning Jurisdictions fund Ready-to-Rent, which includes classes taught in Spanish. The Metro Multifamily Housing Association provides rental forms in Spanish and the Association is considering translation into other languages. Any landlord or property manager may purchase these forms.</p>

Lack of documentation of citizenship creates a host of issues for immigrants who would be entitled to protection under the fair housing act from discrimination based on national origin. In Multnomah County, Latinos make up the majority of undocumented people.

A person who lacks documentation may be reluctant to complain about violations of fair housing law and/or unsafe conditions, because of fear that they will come to the attention of the INS.

People who lack documentation are protected by the Oregon Landlord Tenant Law, but may be unwilling to seek to assert their rights in court, for fear that they will come to the attention of the INS.

In addition, people who lack documentation may be very cautious about approaching any government agency for information, education, or referrals¹⁶.

Undocumented tenants are vulnerable to “no cause” evictions.

This tool may be abused to remove undocumented tenants who complain about unsafe or unhealthy conditions, or assert their rights under federal, state, or local fair housing laws¹⁷.

The Planning Jurisdictions fund The Fair Housing Council of Oregon and Oregon Legal Services to investigate and prosecute complaints of discrimination.

A tenant who is a member of a protected class may choose to ignore the “no cause” eviction and remain in the property beyond the 30-day notice period. When served with a Forcible Entry and Detainer (FED), the tenant may fight the eviction by asserting as a defense that the eviction resulted from bias. This defense would shift the burden to the owner to show that the initial “no cause” eviction was not merely a pretext for discrimination. However, as a practical matter, few protected class members have the resources to obtain the assistance of counsel to challenge the eviction, or the sophistication to assert the defense *pro se*. Moreover, an unsuccessful defense can result in liability for court costs, attorney fees, as well as putting an eviction on one’s rental history. This is a significant risk, and many people who suffer discrimination decide that it is not worth the effort to challenge the initial 30-day ‘no cause’ notice.

IDENTIFIED IMPEDIMENT #3: DISCRIMINATION BASED ON FAMILIAL STATUS (THE PRESENCE OF CHILDREN IN THE HOUSEHOLD).

Of complaints reported by fair housing advocacy groups, the third greatest number were related to familial status¹⁸.

DOCUMENTATION	CURRENT EFFORTS
Landlords refuse to rent to families. Note that 43% of familial status related fair housing complaints are based on refusal to rent ¹⁹ .	The jurisdictions fund several organizations to provide a wide variety of fair housing services ²⁰
Families are subjected to different terms and conditions than other tenants. Note that 38% of familial status related fair housing complaints are based on terms and conditions.	The jurisdictions fund several organizations to provide a wide variety of fair housing services ²¹
There is a shortage of affordable family-sized (3+ bedrooms) housing. As a consequence, many families live in over-crowded conditions ²² .	<p>The City of Portland uses its RFP criteria to encourage development units with three or more bedrooms.</p> <p>The City of Portland has used its Tax Exemption Programs to stimulate development of new family-sized housing.</p> <p>The Single Family Tax Abatement program applies to new single-family homes and condos in "homebuyer opportunity" areas. After a brief hiatus due to legislative inaction, this program is once again available. The 10-year exemption on the improvement value of a home has the effect of lowering house payments for the first 10 years of ownership. Most of the homes with this tax exemption have had at least 3 bedrooms. The program is mapped for low to moderate-income areas of North, Northeast and East Portland. However, there is no requirement that these units be occupied by families with children, and anecdotal evidence suggests that the majority of purchasers do not have children at the time they purchase the house.</p> <p>The multifamily tax exemption programs have public benefit requirements that can be partially satisfied by ensuring that 20% of a project's housing units have three or more bedrooms.</p>

	<p>These programs are available to transit supportive development near light rail stations and other transit-oriented areas (outside the Central City), and to new multifamily housing in the Central City and urban renewal areas. Again, there is no requirement that these units be occupied by families with children.</p>
<p>Families are vulnerable to “no cause” evictions.</p> <p>This tool may be abused to remove families who complain about unsafe or unhealthy conditions, or assert their rights under federal, state, or local fair housing laws²³.</p>	<p>The Planning Jurisdictions fund The Fair Housing Council of Oregon and Oregon Legal Services to investigate and prosecute complaints of discrimination.</p> <p>A tenant who is a member of a protected class may choose to ignore the “no cause” eviction and remain in the property beyond the 30-day notice period. When served with a Forcible Entry and Detainer (FED), the tenant may fight the eviction by asserting as a defense that the eviction resulted from bias. This defense would shift the burden to the owner to show that the initial “no cause” eviction was not merely a pretext for discrimination. However, as a practical matter, few protected class members have the resources to obtain the assistance of counsel to challenge the eviction, or the sophistication to assert the defense <i>pro se</i>. Moreover, an unsuccessful defense can result in liability for court costs, attorney fees, as well as putting an eviction on one’s rental history. This is a significant risk, and many people who suffer discrimination decide that it is not worth the effort to challenge the initial 30-day ‘no cause’ notice.</p>
<p>IDENTIFIED IMPEDIMENT #4: BIAS AGAINST OTHER PROTECTED CLASSES: AGE, SEX, SEXUAL ORIENTATION, GENDER IDENTITY, MARITAL STATUS, RELIGION, AND/OR SOURCE OF INCOME.</p> <p>A smaller number of complaints were reported in each of these areas²⁴.</p>	
<p>EXPLANATORY DETAIL</p>	<p>RECOMMENDATIONS FOR CONTINUATION OF CURRENT EFFORTS AND/OR COMMENCEMENT OF NEW CORRECTIVE ACTIONS</p>
<p>While the number of complaints for other protected classes</p>	<p>The Planning Jurisdictions fund several organizations to provide</p>

was small, complaints suggest discrimination against members of these classes continues to occur.

a wide variety of fair housing services²⁵.

TABLE 59B: SIGNIFICANT ISSUES WITH EXPLANATORY DETAIL

SIGNIFICANT ISSUE #1: THE LOCATION OF SUBSIDIZED AFFORDABLE HOUSING AND AFFORDABLE HOUSING IN THE GENERAL HOUSING MARKET LIMITS THE OPPORTUNITY OF LOW-INCOME HOUSEHOLDS TO EXERCISE MEANINGFUL HOUSING CHOICE²⁶.	
EXPLANATORY DETAIL	RECOMMENDATIONS FOR CONTINUATION OF CURRENT EFFORTS AND/OR COMMENCEMENT OF NEW CORRECTIVE ACTIONS
<p>The City of Portland’s Location Policy, adopted in 1996 in conjunction with the Shelter Reconfiguration Plan, sought to regulate the concentration of affordable housing developed with City-controlled funds in areas of the City where poverty was concentrated. The policy provides exceptions that balance the policy objective of poverty de-concentration against other policy goals that include: responding to localized housing needs, the desire to prevent residential displacement and deference to community-based decision-making about housing development.</p>	
<p>Subsidized affordable housing units are clustered in locations throughout the County: Downtown, Inner NE, North, Inner SE, and Outer SE Portland, and central Gresham area.</p> <p>This clustering of affordable housing has the effect of limiting housing choice for lower income households in other areas.</p> <p>Subsidized housing tends to be located (with some exceptions), in areas with higher crime rates, lower performing schools, and greater number of hazard waste generators²⁷.</p>	

<p>Over the last 10-year period, Inner NE, North, and Inner SE Portland neighborhoods have gone through a gentrification process. Public investment in light rail, storefront improvements, and community policing played a role in supporting the gentrification, but the primary impetus came from the private market.</p> <p>Now, housing in most close-in neighborhoods is priced at a level that is not affordable to lower income households, limiting their housing choices. These areas also show declining poverty rates, emerging commercial amenities, and noted school improvement (with some exceptions)²⁸.</p>	<p>City of Portland funds the Portland Community Land Trust and a number of non-profit community development corporations to create affordable homeownership and rental opportunities that withstand swings in the private housing market.</p>
<p>Housing units that have “housing unit problems” as defined by the Census (including physical condition, affordability or overcrowding issues) are clustered in areas with higher concentrations of low and moderate-income households³⁰.</p>	

<p>The lack of enforcement of Metro’s Affordable Housing Production Goals allows non-participating jurisdictions in the metropolitan area to passively limit housing choices for lower income households³¹.</p>	
<p>SIGNIFICANT ISSUE #2: CONVERSIONS OF FORMERLY AFFORDABLE HOUSING REDUCE OPTIONS FOR LOW-INCOME PEOPLE AND RESULT IN INVOLUNTARY DISPLACEMENT AND DENIAL OF HOUSING CHOICE.</p>	
<p>Due to the rapid increase in housing prices, many private owners are converting affordable rental properties to saleable assets, e.g. converting apartments to condominiums, selling off single family rental properties, selling mobile home parks, converting residential properties to commercial use.</p>	

<p>Tenants in converting private properties typically lack legal protection and have no right to compensation.</p>	
<p>Mobile home owners may lose both their home and their investment in the unit when mobile home park owners sell the property the mobile home rests upon. A mobile home may not be in moveable condition, or it may be prohibitively expensive to relocate it ³².</p>	

SIGNIFICANT ISSUE #3: MANY UNITS THAT LOWER INCOME PEOPLE CAN AFFORD TO RENT ARE POOR QUALITY, UNWEATHERIZED (LEADING TO HIGH HEAT BILLS), AND/OR PRESENT OTHER CONDITIONS THAT POSE A HEALTH HAZARD TO THE TENANTS.

EXPLANATORY DETAIL	RECOMMENDATIONS FOR CONTINUATION OF CURRENT EFFORTS AND/OR COMMENCEMENT OF NEW CORRECTIVE ACTIONS
<p>Healthy Housing for Renters” Project Overview: A collaborative project of the American Lung Association of Oregon and CAT³⁴.</p>	<p>City of Portland, BHCD staff are currently working with City of Portland ONI inspections staff on these issues.</p> <p>Urban renewal efforts target the acquisition and rehabilitation of existing affordable housing. PDC is currently developing a loan program that will help private property owners make necessary repairs to rental units that serve low-income households. PDC administers lead-based paint grants for homeowners and Section 8 rental property owners to provide lead based paint remediation for low-income households. PDC also administers home repair loans for low-income homeowners in urban renewal areas. There are not enough resources to meets all of the housing repair needs.</p>
<p>Outside of Portland, no jurisdiction has a habitability code that applies to the interior of dwellings. Accordingly, there is no ability to compel owners of properties with serious habitability issues to address unsafe housing conditions.</p>	
<p>Gresham recently adopted an exterior habitability code.</p>	

<p>However, Gresham has not dedicated any housing inspector to enforce this code.</p>	
<p>Unweatherized units can lead to high heat bills. Households that cannot afford to heat their units may suffer exposure, creating or exacerbating numerous health problems.</p>	
<p>Building code enforcement is inadequate. Units are not repaired in a timely way, or repairs may not be adequate³⁶.</p>	
<p>There are currently no designated smoke-free units in any publicly funded affordable housing.</p> <p>Second hand smoke compromises the overall health of other building tenants. The adverse impact is particularly strong for children, tenants with respiratory problems and/or compromised immune systems³⁷.</p>	
<p>A large proportion of affordable units in Multnomah County were constructed before 1978 and are contaminated with lead-based paint. Unless this hazard is remediated, lead paint chips pose a health hazard, particularly to young children.</p> <p>Many affordable units have interior mold. This poses a health hazard, particularly to people with respiratory impairments³⁹.</p>	<p>Multnomah County Environmental Health Department has received a two year, two million dollar Healthy Homes grant from HUD for outreach and education to address these issues.</p>
<p>“No Cause Eviction” may be abused to retaliate against renters who request repairs⁴¹.</p>	<p>The Planning Jurisdictions fund The Fair Housing Council of Oregon and Oregon Legal Services to investigate and prosecute complaints of discrimination.</p> <p>A tenant who is a member of a protected class may choose to ignore the “no cause” eviction and remain in the property beyond the 30-day notice period. When served with a Forcible Entry and Detainer (FED), the tenant may fight the eviction by asserting as a defense that the eviction resulted from bias. This defense would shift the burden to the owner to show that the initial “no cause” eviction was not merely a pretext for</p>

	<p>discrimination. However, as a practical matter, few protected class members have the resources to obtain the assistance of counsel to challenge the eviction, or the sophistication to assert the defense <i>pro se</i>. Moreover, an unsuccessful defense can result in liability for court costs, attorney fees, as well as putting an eviction on one’s rental history. This is a significant risk, and many people who suffer discrimination decide that it is not worth the effort to challenge the initial 30-day ‘no cause’ notice.</p> <p>Landlord and property management associations undertake continuing efforts to educate members about Oregon Landlord Tenant law.</p>
<p>SIGNIFICANT ISSUE #4: SCREENING CRITERIA BAR MANY FROM ACCESS TO AFFORDABLE HOUSING, LIMITING HOUSING CHOICE⁴².</p>	
<p>EXPLANATORY DETAIL</p>	<p>CURRENT EFFORTS</p>
<p>Screening criteria commonly used by the industry (e.g. rent to income ratio, history of eviction, credit history, criminal history) creates a barrier to housing for many.</p>	<p>Housing Connections: this web site lists a wide variety of available, affordable and special needs housing.</p> <p>Fresh Start, Ready to Rent, and the Risk Mitigation pool offer landlords an incentive to relax their screening criteria by reducing the risk. These programs are underutilized.</p>
<p>People with any contacts with law enforcement will face significant barriers to housing. Some landlords use outdated or irrelevant criminal history information to screen out tenant applications. The use of “police contacts” may also be being used for screening. We believe that some of these criteria have a disparate impact on people of color⁴³.</p>	
<p>Many landlords do not accept tenants with Section 8⁴⁴.</p>	<p>HousingConnections.org allows voucher holders to search for units that accept Section 8.</p> <p>City and PDC policy requires publicly subsidized housing to</p>

	accept Section 8 vouchers.
High health care costs require lower income households to make choices between paying their medical bills or paying rent/mortgage ⁴⁵ .	
Landlord screening criteria that require a high income to rent ratio puts housing out of reach of many low-income households ⁴⁶ .	
Many low-income people lack knowledge about the rental process, rental/lease agreements, landlord and tenant rights and responsibilities ⁴⁸ .	
The practice of requiring prospective tenants to pay for a separate credit report at each property they apply at, limits the ability of low-income households to seek out their choice of housing ⁴⁹ .	
Significant Issue #5: The general unavailability of affordable housing units across the county continues to limit housing choice⁵⁰.	
EXPLANATORY DETAIL	RECOMMENDATIONS FOR CONTINUATION OF CURRENT EFFORTS AND/OR COMMENCEMENT OF NEW CORRECTIVE ACTIONS
	PDC has developed housing strategies in most of the City's urban renewal areas establishing a priority of maintaining the stock of affordable housing in urban renewal areas and increasing the amount of low income housing with long-term affordability agreements (60-year affordability agreements). PDC funding affordable housing development in all of the non-industrial urban renewal areas. Challenges: In many URAs, the funding availability is lower than what would be needed to keep up with market dynamics resulting in the loss of affordable housing. Also, NIMBY-ism in Portland

	<p>neighborhoods often results in project compromises that reduces the number of deeply affordable units in a project.</p> <p>The City and PDC Affordable Housing Spring RFP has established funding priorities for housing that serves tenants with incomes below 30% MFI. PDC has developed housing strategies in urban renewal areas to ensure there is a range of housing available in urban renewal areas. The strategies identify the gaps in housing availability in terms of income affordability and housing type and establish development priorities to fill those gaps. There continue to be challenges related to the level of funding available, availability of land for development and neighborhood siting issues.</p>
<p>There have been instances where local residents, and /or neighborhood associations, have opposed the development of new affordable housing in their area. In some cases, low-income communities have resisted development of new affordable housing, claiming that the area is saturated. (e.g. Lents Town Center Urban Renewal Area)⁵².</p>	<p>The City of Portland’s Office of Neighborhood Involvement has a program to resolve siting disputes concerning affordable special needs housing using mediation and tools such as Good Neighbor Agreements.</p>
<p>There is a lack of affordable housing units for tenants with incomes below 30% Median Family Income⁵³.</p>	<p>The City of Portland uses its RFP criteria to encourage development of units affordable to households with incomes at or below 30% MFI.</p> <p>The City of Portland also has a preservation strategy to preserve existing affordable housing by placing it into non-profit ownership.</p>
<p>The need for family-sized (3+ bedrooms) affordable housing is greater than the supply⁵⁴.</p>	<p>The City of Portland uses its RFP criteria to encourage development of units with three or more bedrooms.</p>
<p>There is an inadequate supply of housing opportunities for survivors of domestic violence⁵⁵.</p>	

There is an insufficient supply of permanent supportive housing affordable to people with special needs ⁵⁶ .	The City of Portland uses its RFP criteria to encourage development of permanent supportive housing for people with special needs. The current focus is on people who have experienced chronic homelessness.
Communities on occasion object to the location of special needs housing in their communities.	The City of Portland funds staffing at ONI to administer a siting assistance program that promotes the siting of special needs housing by facilitating the development of “good neighbor” agreements, providing community education, and offering and dispute resolution services.
Senior households with limited incomes have limited housing choice ⁵⁷ .	Housing Connections
People with disabilities and limited incomes have limited housing choice ⁵⁸ .	Housing Connections
SIGNIFICANT ISSUE #6: COMPOSITION OF BOARDS AND COMMISSIONS	
The composition of the Boards and Commissions that establish policies, make funding decisions, and oversee practices that relate to housing does not, with some exceptions, reflect the diversity of the community ⁵⁹ .	

¹ See Table 11a (complaint data); map 16: AI Public Testimony

² Fair Housing Services: Legal Aid Services of Oregon provides advice and representation for people experiencing housing discrimination. Fair Housing Council of Oregon provides fair housing services for people experiencing housing discrimination within the City of Portland; Provides outreach, education and the staffing of an I & R help line CDBG \$17,580. The Bureau of Labor and Industries (BOLI) provides civil rights enforcement. Community Alliance of Tenants provides a hotline and outreach Program for low-income renters to provide education, information and referral to assist with housing stabilization.

³ Interview 48, 50

⁴ AI Public Testimony, Interview 11

⁵ Interview 9

⁶ 839-006-0206 Examples of Reasonable Accommodation

(1) Reasonable accommodation of an otherwise qualified, disabled person may include, but is not limited to:

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- (a) Making existing facilities used by employees readily accessible to and usable by disabled persons;
 - (b) Providing job restructuring, such as part-time or modified work schedules or reassignment to vacant positions;
 - (c) Acquiring or modifying equipment or devices;
 - (d) Appropriately adjusting or modifying examinations, training materials or policies; or
 - (e) Providing qualified readers or interpreters.

(2) An employer may not be found to have engaged in an unlawful employment practice solely because the employer fails to provide reasonable accommodation to a person with a disability arising out of transsexualism. However, an employer may not refuse to hire or promote or bar or discharge from employment or discriminate in compensation, terms, conditions or privileges of employment because a person is transsexual when the person is otherwise qualified.

Stat. Auth.: ORS 659A.805

Stats. Implemented: ORS 659A.103, ORS 659A.142 & ORS 659A.112 - ORS 659A.139

Hist.: BLI 15-2000, f. & cert. ef. 8-11-00; BLI 10-2002, f. & cert. ef. 5-17-02

⁷ Interview 13

⁸ See HCDC Public Hearing Testimony for the 2005-2010 Consolidated Plan.

⁹ AI Public Testimony

¹⁰ Interviews 2 and 25; CAT Renters Hotline Data; CAT written testimony; Metro Multifamily Housing Association public comments in Advisory Committee Meeting

¹¹ Table 11a (complaint data); AI Public Testimony; Interview 44, 46, 47, 48, 49; Ventures Urban Indian Communities – Portland Survey Summary

¹² Ibid.

¹³ Ibid.

¹⁴ Interview 21, 47, 48, 49. Maps 28, 59-62. Tables 12-30, 34-36. Consolidated Plan 2005-2010; AI public testimony HMDA data

¹⁵ Interviews 3, 5, and 17; AI Public Testimony; tables 50, 51, 52; 2005-2010 Consolidated Plan testimony; ; Metro Multifamily Housing Association public comments in Advisory Committee Meeting

¹⁶ Interviews 2, 3, 5, 6, 50 and 11; Metro Multifamily Housing Association public comments in Advisory Committee Meeting

¹⁷ Interviews 17 and 25 includes multiple service providers; CAT Renters Hotline Data; CAT written testimony; 2005-2010 Consolidated Plan testimony; Metro Multifamily Housing Association public comments in Advisory Committee Meeting

¹⁸ Table 11a (complaint data); AI Public Testimony; Interview 44, 46, 47, 48, 49; Ventures Urban Indian Communities – Portland Survey Summary

¹⁹ Table 11a (complaint data); AI Public Testimony

²⁰ Ibid.

²¹ Ibid.

²² 2005-2010 Consolidated Plan market analysis; NAYA focus group; housing connections; Map 15, 26, 27; Tables 41-44; 2005-2010 Consolidated Plan testimony; Interview 44, 47, 48, 49, 50

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- ²³ 2005-2010 Consolidated Plan testimony; Metro Multifamily Housing Association public comments in Advisory Committee Meeting; Interview 47
- ²⁴ Table 11a (complaint data); AI public testimony from Basic Rights Oregon
- ²⁵ Ibid.
- ²⁶ Table 11; Maps 1,2, 8, 9, 10, 11,12, 13, 14, 19 –23, 37-42, 43, 47, 63; *2005-2010 Consolidated Plan* testimony; AI Public Testimony; HAP written testimony
- ²⁷ Interviews 6, 22, 16, 4, 11, 25, 47 and 10; Crime data tables 31 and 32 and Appendix IV; School data (Appendix III); Tables 53-55; Maps; Maps 3, 4, 5, 6, 7, 17, 18, 44-46
- ²⁸ Maps 64-70; Anderson and Pietka, *Managing Neighborhood Change in a Hot Market: Portland’s Approaches*. Interview 47, 48, 49, 50
- ³⁰ Map 29, 30, 31, 48-58
- ³¹ Interview 7; table 1; Metro’s RAHS report
- ³² Interview 38; maps 24, 25; Lednicer, Lisa Grace, “Rules focus on owners of mobile home parks: Affordable housing Wilsonville requirements would include owners paying tenants’ moving costs,” *The Oregonian*, Wednesday, October 19, 2005.; Consolidated Plan 2005-2010 testimony.
- ³⁴ Table 11; Maps 1,2 ,8, 9, 10, 11,12, 13, 14, 19 –23, 32-36; Office of Neighborhood Involvement (ONI) Inspections Program Database Development Report, May 2005; Interview 50; Office of Sustainable Development Comment
- ³⁶ Interview 13, CAT Renters Hotline Data; 2005-2010 Consolidated Plan testimony; ; Metro Multifamily Housing Association written public testimony
- ³⁷ Interviews 3, 19, and 25; Reports in bibliography; AI Public Testimony; *2005-2010 Consolidated Plan* testimony; Independent Living Resources written testimony
- ³⁹ Interviews 2 and 5; lead data tables 37, 38, 39, 40; CAT Renters Hotline Data; CAT written testimony; HUD National Study of Lead and Allergens in Housing, Final Report; *2005-2010 Consolidated Plan* testimony
- ⁴¹ Interview 2 CAT Renters Hotline Data; CAT written testimony; 2005-2010 Consolidated Plan testimony; Metro Multifamily Housing Association public comments in Advisory Committee Meeting; “Question of the Month,” *The Apartment Manager Portland Metro Vancouver*, October 2005
- ⁴² 2005-2010 Consolidated Plan
- ⁴³ Interviews 3, 6, 12, 25, 44, 46, 47 and 49.
- ⁴⁴ Interviews 9, 17, and 25, map 13 and 63
- ⁴⁵ AI Public Testimony; Independent Living Resources written testimony.
- ⁴⁶ Interview 46, 48
- ⁴⁸ Interviews 49 and 50
- ⁴⁹ Interview 50
- ⁵⁰ 2005-2010 Consolidated Plan testimony; 2005-2010 Consolidated Plan market analysis; Interview 45, 47, 49, 50
- ⁵² Discussion with PDC Policy Manager.

⁵³ 2005-2010 Consolidated Plan testimony; 2005-2010 Consolidated Plan market analysis;

⁵⁴ 2005-2010 Consolidated Plan market analysis; Housing Connections; Map 15, 26, 27; Tables 41-44; 2005-2010 Consolidated Plan testimony

⁵⁵ Interview 12, 47; 2005-2010 Consolidated Plan testimony

⁵⁶ Interview 25; Special Needs Report; 2005-2010 Consolidated Plan testimony;

⁵⁷ Table 45, 46, 47 maps 17, 18, 48-58; 2005-2010 Consolidated Plan testimony;

⁵⁸ Table 56-58; AI public testimony; Independent Living Resources written testimony

⁵⁹ Interview 47

SECTION FIVE: RECOMMENDATIONS TO ADDRESS IMPEDIMENTS AND SIGNIFICANT ISSUES

INTRODUCTION

Following are the recommendations to address the impediments and significant issues identified in Section Four of this Analysis of Impediments to Fair Housing (AI) for the Portland Consortium (Portland, Gresham, and Multnomah County). These recommendations were developed with input from the AI Advisory Committee, the AI Technical Committee, HCDC and the general public.

GUIDE TO THE RECOMMENDATIONS

Please review this guide for a better understanding of how the recommendations are organized and presented below.

Recommendations are first divided into the following four categories:

Funded Activities: The designated jurisdictions will fund contracts with outside organizations to complete the work.

Staff Time or Planning: The designated jurisdictions will dedicate staff time to organizing, planning, resource development and other tasks as needed, to complete these activities.

Advocacy Issues: Jurisdictions may dedicate limited staff time to support advocacy efforts led by another agency/organization on these issues. Jurisdictions will base their level of activity on staff availability.

Within the above three categories, recommendations are divided into the following categories:

Recommendations Related to Federal, State and Local Fair Housing Law: These are recommendations that address clear violations of federal, state or local fair housing laws, called “impediments” in the AI.

Recommendations Related to Housing Choices: These are recommendations that address issues that limit housing choice, called “significant issues” in the AI.

Within each of the recommendations tables you will find the following information:

Recommendations for Continuation of Current Efforts and/or Commencement of New Corrective Actions: A brief description of the recommendation, explaining how it will address the impediment or significant issue.

Impediment or Significant Issue: This is a brief summary of the impediment(s) or significant issue(s) that the recommendation is intended to address. If you would like more detailed information on the impediment or significant issue, please review Section Four of the AI.

Place in the FY 06-07 Action Plan: The Annual Consolidated Plan Action Plan, prepared by each jurisdiction for HUD, outlines the activities the jurisdiction will undertake in the fiscal year. This column indicates whether the activity will be included in the FY 2006-07 Action Plan. Recommendations that are direct services will be added to the Consortium's Action Plans. Recommendations that are planning and policy development in nature are considered administrative and will not typically be listed in the Consortium's Action Plans.

Proposed Resource Allocation: Suggests a funding level for all funded activities and allocation of other resources such as staff for planning and policy activities. Funding amounts are based on current contract amounts. If CDBG and HOME allocations to the jurisdictions decrease, funding levels to these activities may be decreased. In addition, funding allocations may change each Action Plan year based on current need and performance.

Responsible Jurisdiction or Entity: Where applicable, indicates the jurisdiction(s) responsible for implementing the activity, and accountable for achieving outcomes.

TABLE 60: FUNDED ACTIVITIES-RECOMMENDATIONS RELATED TO FEDERAL, STATE & LOCAL FAIR HOUSING LAW

Funded Activities – Recommendations Related to Federal, State, and Local Fair Housing Law

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Fair Housing Services – The jurisdictions should continue to fund the organizations listed below, that provide a range of fair housing services, including but not limited to actively pursuing enforcement of the fair housing laws.</p> <p>Total funding for fair housing services is insufficient to meet the need for these services. Recent federal funding cuts have further reduced the amount of resources available to pay for these services.</p> <p>The jurisdictions should increase their support for fair housing services to back-fill the federal cuts. Funding for these services should be at FY 2004-2005 levels, at a minimum, which would require an additional \$80,000 from jurisdictions.</p> <p>Contracts for FY 06-07 will include an increased focus on education regarding the reasonable accommodation process for tenants with disabilities, and agencies who serve them, and landlords who may receive these requests.</p> <p>In order to stimulate the reporting of fair housing violations, and to avoid the potential for retaliation against individual complainants, contracts for FY 06-07 will also require contractors to educate and encourage the agencies serving protected class populations to pursue fair housing enforcement actions in their own name. Agencies have direct standing to sue if the alleged discriminatory activity drained its resources both by “diverting its resources and frustrating its mission.” Clients are reluctant to file claims because of concerns about retaliation by the property owners/managers.</p>	<p>Impediment #1 Discrimination-Disability: Landlords are not always willing to modify policies or practices as “reasonable accommodation” to persons with disabilities. Tenants with disabilities are vulnerable to 30-day “no-cause” evictions.</p> <p>Impediment #2 Discrimination-Race, Color, National Origin: Refusal to rent based on race, color, national origin. A person who lacks documentation may be reluctant to complain about violations of fair housing law, the Oregon Landlord Tenant Law, and/or unsafe conditions due fear that they will come to the attention of the INS. In addition, people who lack documentation may be very cautious about approaching any government agency for information, education, or referrals. Tenants are subjected to different terms and conditions based on race or national origin. Undocumented tenants are vulnerable to “no cause” evictions.</p>	<p>Yes</p>	<p>Request to Gresham to fund Fair Housing Council of Oregon.</p> <p>Portland will look for additional resources to fill funding gap created by loss of federal grant.</p> <p>Fair Housing Council of Oregon: City of Portland \$17,580 CDBG and \$12,059 General Fund; Multnomah County \$3,162 CDBG.</p> <p>Legal Aid Services of Oregon: City of Portland \$43,870 CDBG; Multnomah County \$12,600 CDBG; City of Gresham \$5,398 CDBG.</p> <p>Community Alliance of Tenants: City of Portland \$40,000 CDBG.</p> <p>BOLI: City of Portland \$20,184 General.</p>	<p>City of Portland, Multnomah County and City of Gresham</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>(continued from previous page)</p> <p>Organizations providing fair housing services with funding from the jurisdictions: Legal Aid Services of Oregon (LASO) provides advice and representation for people experiencing housing discrimination. Fair Housing Council of Oregon (FHCO) provides fair housing coordination, education, outreach, enforcement, testing services and a hotline. The Bureau of Labor and Industries (BOLI) provides administrative enforcement of discrimination complaints based on sexual orientation, source of income and gender identity. Community Alliance of Tenants operates the Renter Stability Education Program that includes a hotline and outreach program for low-income renters to provide education regarding local and state landlord-tenant law, and information and referral to assist with housing stabilization.</p> <p>The Oregon Law Center (OLC) provides fair housing services but does not currently receive funding from the jurisdictions. OLC does not accept does not accept federal legal aid funding to avoid the prohibition on assisting undocumented people</p>	<p>(continued from previous page)</p> <p>Impediment #3 Discrimination-Familial Status: Landlords refuse to rent to families. Families are subjected to different terms and conditions than other tenants. Families are vulnerable to “no cause” evictions. This tool may be abused to remove families who complain about unsafe or unhealthy conditions, or assert their rights under federal, state, or local fair housing laws.</p> <p>Impediment #4 Discrimination-Other Protected Classes: While the number of complaints for other protected classes was small, complaints suggest discrimination against members of these classes continue to occur.</p> <p>Significant Issue #3 Poor Quality Housing: “No Cause Eviction” may be abused to retaliate against renters who request repairs.</p>	<p>Yes</p>		

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Unlimited Choices – The Planning Jurisdictions should continue to support Unlimited Choices’ Adapt-a-Home, to provide low-cost accessibility accommodations.</p>	<p>Impediment #1 Discrimination-Disability: There are insufficient numbers of accessible units to meet demand. Many units described as “accessible” do not have wheelchair accessible showers. The tenants must bear all costs of making a unit accessible. Note that 22% of disability related fair housing complaints are based on design-construction issues.</p>	<p>Yes</p>	<p>Adapt-A-Home: City of Portland \$285,000; Multnomah County \$65,000 CDBG; City of Gresham \$90,000 CDBG</p>	<p>City of Portland, Multnomah County and City of Gresham</p>
<p>Siting Program – The City of Portland should continue to fund its Office of Neighborhood Involvement to administer a siting assistance program that promotes the siting of special needs housing by providing the community education, dispute resolution services and tools such as Good Neighbor Agreements.</p>	<p>Impediment #1 Discrimination-Disability: There have been instances of neighborhood opposition to the development of special needs housing.</p> <p>Significant Issue #5 Unavailability of Housing: There have been instances where local residents, and /or neighborhood associations, have opposed the development of new affordable and special needs housing in their area. In some cases, low-income communities have resisted development of new affordable housing, claiming that the area is saturated. (e.g. Lents Town Center Urban Renewal Area).</p>	<p>Yes</p>	<p>ONI: City of Portland \$25,984</p>	<p>City of Portland</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Close the Minority Homeownership Gap - Portland City Council has adopted a goal of closing the Minority Homeownership Gap by 2015. The City of Portland should fund a set of short-term strategies to close the gap, as proposed by the Homeownership Advisory Committee (HOAC). Limited federal funds are available for implementation, but PDC will be making some non-federal resources available for this campaign.</p>	<p>Impediment #2 Discrimination-Race, Color, National Origin: There is a significant minority homeownership gap, as documented in two reports issued in 2004 by the Housing and Community Development Commission's Home Ownership Advisory Committee (HOAC). The homeownership rate for whites in 2000 was 59%, while the rate for African Americans, Native Americans, and Hispanics averaged 34%. A key factor is the loan denial rate. Among white and minority households with like incomes, the loan denial rate is as much as twice as high for minority applicants.</p>	<p>Yes</p>	<p>City of Portland: \$250,000 CDBG, \$86,000 HOME/ADDI and requested \$1,000,000 HIF</p>	<p>City of Portland</p>

TABLE 61: FUNDED ACTIVITIES-RECOMMENDATIONS RELATED TO HOUSING CHOICE

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>HousingConnections.org is a web site that lists a wide variety of affordable, accessible and special needs housing throughout Multnomah and surrounding counties. The site assists with housing choice by providing one simple location to find a wide variety of housing. The site specifically allows voucher holders to search for units that accept Section 8. Housing Connections lists accessible units to assist people with disabilities to find available accessible units. Planning is underway to enhance how accessible units are listed in Housing Connections to provide more accurate detail of accessibility features. There is also an effort to increase number of accessible listings in the site. FHCO is working with landlords as part of their outreach contract to educate landlords about need for accessible units and how to advertise units to renters with accessibility needs. In the FY 06-07 contract with FHCO, the City of Portland will ask FHCO to work with landlords to encourage them to make additional marketing efforts of accessible units to agencies that have contacts with disabled renters as they come available, especially at initial lease up of new properties.</p>	<p>Impediment #1 Discrimination-Disability: Even when an accessible unit is available and advertised, it will often have been leased to non-disabled tenants before a disabled person has had the chance to apply. There is no requirement that public or private property owners reserve or hold open accessible units, or seek referrals from agencies that provide services to people with disabilities.</p> <p>Significant Issue #4 Screening Criteria: Many landlords do not accept tenants with Section 8.</p> <p>Significant Issue #5 Unavailability of Housing: Senior households with limited incomes have limited housing choice.</p> <p>Significant Issue #5 Unavailability of Housing: People with disabilities and limited incomes have limited housing choice.</p>	<p>Yes</p>	<p>211info: City of Portland \$75,000 CDBG.</p> <p>FHCO: City of Portland \$25,000 CDBG.</p>	<p>City of Portland</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
	<p>(continued from previous page)</p> <p>Significant #1 Discrimination-Disability: There are insufficient numbers of accessible units to meet demand. Even when an accessible unit is available and advertised, it will often have been leased to non-disabled tenants before a disabled person has had the chance to apply. There is no requirement that public or private property owners reserve or hold open accessible units, or seek referrals from agencies that provide services to people with disabilities.</p>			

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Ready to Rent – Continue funding the Ready-to-Rent program, a renter education training program in English and Spanish. Research need for offering Ready to Rent classes in other languages and the need to translate class materials into other languages.</p> <p>Ready to Rent, Fresh Start and Risk Mitigation Pool – Fresh Start, Ready to Rent, and the Risk Mitigation pool offer landlords an incentive to relax their screening criteria by reducing the risk. Fresh Start and Ready to Rent are underutilized. Increase usage of these programs because they assist renters who do not meet traditional screening criteria.</p>	<p>Impediment #2 Discrimination- Race, Color, National Origin: Cultural differences, including the lack of a common language, can impede landlord/tenant communication. The tenant may not receive clear instruction about the application process, or property rules. The landlord 's ability resolve differences, and facilitate tenant disputes is diminished.</p> <p>Significant Issue #4 Screening Criteria: Screening criteria commonly used by the industry (e.g. rent to income ratio, history of eviction, credit history, criminal history) creates a barrier to housing for many. Many low-income people lack knowledge about the rental process, rental/lease agreements, landlord and tenant rights and responsibilities.</p>	Yes	Housing Authority of Portland: City of Portland \$14,001 General Fund and \$34,600 CDBG.	City of Portland

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Removing Criminal Records - The City of Portland and Multnomah County should support "Clean Slate" events and/or other on-going opportunities to clear out-of-date infractions from the criminal records of individuals with good records for a long time. Due to the cap on the percentage of federal funds that may be spent on public services, this activity should be funded with non-federal funds.</p>	<p>Significant Issue #4 Screening Criteria: People with any contacts with law enforcement will face significant barriers to housing. Some landlords use outdated or irrelevant criminal history information to screen out tenant applications. "Police contacts" may also be used for screening. Some of these criteria have a disparate impact on people of color.</p>	<p>Yes</p>	<p>Current funding levels.</p>	<p>City of Portland and Multnomah County</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Non-profit Housing Development and Land Trust - City of Portland funds the Portland Community Land Trust and a number of non-profit community development corporations to create affordable homeownership and rental opportunities that withstand swings in the private housing market.</p>	<p>Significant Issue #5 Unavailability of Housing: Over the last 10-year period, Inner NE, North, and Inner SE Portland neighborhoods have gone through a gentrification process. Public investment in light rail, storefront improvements, and community policing played a role in supporting the gentrification, but the primary impetus came from the private market. Now, housing in most close-in neighborhoods is priced at a level that is not affordable to lower income households, limiting their housing choices. These areas also show declining poverty rates, emerging commercial amenities, and noted school improvement (with some exceptions) to which low-income people have limited access.</p>	<p>Yes</p>	<p>Current funding levels.</p>	<p>City of Portland</p>
<p>Accessible Unit Inventory – All jurisdictions complete an inventory of all locally funded accessible units including details about accessibility features such as roll in showers. List this information in Housing Connections.</p>	<p>Impediment #1 Discrimination-Disability: Property managers are often not aware of what accessibility features their units have, or do not have that information available for disabled renters seeking housing. Many units described as “accessible” do not have wheelchair accessible showers. The tenants must bear all costs of making a unit accessible.</p>	<p>No (included in Admin)</p>	<p>Staff at jurisdictions and PDC</p>	<p>City of Portland, Multnomah County and City of Gresham</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>New RFP Selection Criteria for Affordable Units – Add the following preferences to RFP selection in the funding of new and rehabilitated affordable housing developments:</p> <ul style="list-style-type: none"> • Large (2+ bedroom) accessible units • Roll in showers in accessible units • Smoke free housing (preferably entire buildings or floors) <p>Related Recommendations – Determine need for roll in showers, based on need establish goal to increase number of roll in showers in new and rehabilitated affordable housing developments.</p> <p>Establish requirement in loan agreements that newly developed locally funded properties will hold accessible units available for persons with disabilities for some designated time period.</p> <p>The jurisdictions should participate in the Smoke-free Multifamily Housing Committee.</p>	<p>Impediment #1 Discrimination-Disability: There is a shortage of accessible units with 2 or more bedrooms. This makes it particularly difficult for families that include a person with a physical disability to find housing. Many units described as “accessible” do not have wheelchair accessible showers. The tenants must bear all costs of making a unit accessible. Even when an accessible unit is available and advertised, it will often have been leased to non-disabled tenants before a disabled person has had the chance to apply. There is no requirement that public or private property owners reserve or hold open accessible units, or seek referrals from agencies that provide services to people with disabilities.</p> <p>Significant Issue #3 Poor Quality Housing: Second hand smoke compromises the overall health of other building tenants. The adverse impact is particularly strong for children, tenants with respiratory problems and/or compromised immune systems.</p>	<p>Yes (reflect criteria in Consolidated Plan)</p>	<p>Staff at jurisdictions and PDC</p>	<p>City of Portland, Multnomah County and City of Gresham</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Landlord Tenant Issue Workgroup - Support the development of a workgroup of tenant advocates and property management industry representatives to explore strategies to address the following issues: abuse of no cause eviction for retaliatory purposes; underreporting of fair housing violations, code violations and violations of landlord/tenant law; educating non-English speakers about legal protections for tenants and members of protected classes; tools to remove tenants involved in drug dealing, prostitution and other criminal activity; expense of remediating hazardous property conditions; and technical assistance on reasonable accommodation requests and related issues. Potential mechanisms include landlord licensing, limiting "no cause" evictions, proactive unit inspections, increased police attention to illegal activity and expansion of landlord and tenant education programs.</p> <p>Landlord Licensing is a potential mechanism for review because it could be used to ensure that landlords and property managers receive training on fair housing, landlord tenant law, and maintenance codes. Licensing programs also are used to regulate compliance with these laws and regulations.</p>	<p>Impediments #1-4 All Protected Classes: Discrimination based on protected class. Housing units that have "housing unit problems" as defined by the Census (including physical condition, affordability or overcrowding issues) are clustered in areas with higher concentrations of low and moderate-income households. Tenants with disabilities are vulnerable to 30-day "no-cause" evictions. Note that 21% of disability related fair housing complaints are based on eviction issues. This tool may be abused to remove disabled tenants whose appearance or behaviors are perceived to be offensive to other tenants or prospective tenants. This tool may also be abused to remove tenants who complain about unsafe or unhealthy conditions or asset their rights under federal, state, or local fair housing laws.</p> <p>Significant Issue #3 Poor Quality Housing: "No Cause Eviction" may be abused to retaliate against renters who request repairs.</p> <p>Significant Issue #1 Location of Housing: Housing units that have "housing unit problems" as defined by the Census (including physical condition, affordability or overcrowding issues) are clustered in areas with higher concentrations of low and moderate-income households.</p>	<p>If staff does the work, it is considered an administrative function, not an Action Plan activity. If the work is contracted out an activity must be included in the Action Plan.</p>	<p>Staff at jurisdictions</p> <p>Note: If a similar effort to discuss issues and strategies with landlords and tenants emerges, jurisdictions will collaborate with that effort rather than creating a separate effort.</p>	<p>City of Portland, Multnomah County and City of Gresham</p>

TABLE 62: STAFF TIME/PLANNING-RECOMMENDATIONS RELATED TO HOUSING CHOICE

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Increased Commission Recruitment - All jurisdictions should increase recruitment efforts from protected class communities and economically diverse groups to fill vacancies on the Planning Commission, Housing and Community Development Commission, HAP Board, urban renewal advisory committees, project selection committees and other advisory bodies that oversee housing policies.</p>	<p>Significant Issue #6 Board Composition: The composition of the Boards and Commissions that establish policies, make funding decisions, and oversee practices that relate to housing does not, with some exceptions, reflect the diversity of the community.</p>	<p>No</p>	<p>Staff at jurisdictions, HAP and PDC</p>	<p>City of Portland, Multnomah County and City of Gresham</p>
<p>Require Acceptance of Section 8 - Explore adoption of ordinance prohibiting discrimination based on receipt of federal subsidy payments (e.g. Section 8 Housing Vouchers).</p>	<p>Significant Issue #4 Screening Criteria: Many landlords do not accept tenants with Section 8.</p>	<p>If staff does the work, it is considered an administrative function, not an Action Plan activity. If the work is contracted out an activity must be included in the Action Plan.</p>	<p>staff at jurisdictions</p>	<p>City of Portland, Multnomah County and City of Gresham</p>
<p>Interior Habitability Codes – Jurisdictions outside of City of Portland add a interior habitability code and provide adequate inspection and enforcement.</p>	<p>Significant Issue #3 Poor Quality Housing: Outside of Portland, no jurisdiction has a habitability code that applies to the interior of dwellings. Accordingly, there is no ability to compel owners of properties with serious habitability issues to address unsafe housing conditions.</p>	<p>No</p>	<p>staff at jurisdictions</p>	<p>Jurisdictions outside of City of Portland</p>
<p>Code Enforcement - Dedicate a Gresham housing inspector to enforce its exterior habitability code.</p>	<p>Significant Issue #3 Poor Quality Housing: Gresham recently adopted an exterior habitability code. However, Gresham has not dedicated any housing inspector to enforce this code.</p>	<p>No</p>	<p>staff at jurisdictions</p>	<p>City of Gresham</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Increased Code Enforcement and Fines – Work in the City of Portland to increase enforcement.</p>	<p>Significant Issue #3 Poor Quality Housing: Building code enforcement is inadequate. Units are not repaired in a timely way, or repairs may not be adequate.</p> <p>Significant Issue #1 Location of Housing: Housing units that have “housing unit problems” as defined by the Census (including physical condition, affordability or overcrowding issues) are clustered in areas with higher concentrations of low and moderate-income households.</p>	<p>No (Admin)</p>	<p>staff at jurisdictions</p>	<p>City of Portland</p>
<p>New Conversion Ordinance - Research and explore the development of a new conversion ordinance to provide appropriate protections to low-income households impacted by conversions.</p>	<p>Significant Issue #2 Conversions: Due to the rapid increase in housing prices, many private owners are converting affordable rental properties to saleable assets, e.g. converting apartments to condominiums, selling off single family rental properties, selling mobile home parks, converting residential properties to commercial use. Tenants in converting private properties typically lack legal protection and have no right to compensation.</p>	<p>No (Admin)</p>	<p>staff at jurisdictions</p>	<p>City of Portland, Multnomah County and City of Gresham</p>

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Location Policy - Jurisdictions should consider implementing a housing location policy across Multnomah County. The City of Portland should revisit its Location Policy, make revisions if needed to ensure it strikes a balance between competing City housing goals. This may include working to locate new affordable housing in the attendance areas of highly performing schools. As part of this process, review the "3, 6, 9 Public Housing Concentration Policy," a proposal that would have the city of Portland establish as its primary public housing client goal in each Portland neighborhood a target of six (6) percent of that neighborhood's population. Goals for minimum and maximum would be established so that no neighborhood would have fewer than three (3) percent and no neighborhood would have more than nine (9) percent of its population as public housing clients.</p>	<p>Significant Issue #1 Location of Housing: The City of Portland's Location Policy, adopted in 1996 in conjunction with the Shelter Reconfiguration Plan, sought to regulate the concentration of affordable housing developed with City-controlled funds in areas of the City where poverty was concentrated. The policy provides exceptions that balance the policy objective of poverty de-concentration against other policy goals that include: responding to localized housing needs, the desire to prevent residential displacement and deference to community-based decision-making about housing development.</p>	<p>If staff does the work, it is considered an administrative function, not an Action Plan activity. If the work is contracted out an activity must be included in the Action Plan.</p>	<p>staff at jurisdictions</p>	<p>City of Portland, Multnomah County and City of Gresham</p>
<p>Reduce Multiple Application and Credit Report Fees - Continue effort to find a way for renters to apply for multiple units for one fee through Housing Connections.</p>	<p>Significant Issue #4 Screening Criteria: The practice of requiring prospective tenants to pay for a separate credit report at each property they apply at, limits the ability of low-income households to seek out their choice of housing.</p>	<p>If staff does the work, it is considered an administrative function, not an Action Plan activity. If the work is contracted out an activity must be included in the Action Plan.</p>	<p>staff at jurisdictions</p>	<p>City of Portland</p>

TABLE 63: ADVOCACY-RECOMMENDATIONS RELATED TO FEDERAL, STATE, & LOCAL FAIR HOUSING LAW

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Extension of Reasonable Accommodation to Gender Identity – Advocate for extension of regulation prohibiting discrimination on the basis of gender identity into fair housing regulations. (See, OAR 839-006-0206) Seek out an appropriate case to assert this argument. Encourage an agency that serves transgender individuals to file a case.</p>	<p>Impediment #1 Discrimination-Disability: Claims of discrimination based on gender identity are sometimes brought under the “disability” provisions of the fair housing law, because the plaintiffs are perceived as disabled, and because there is no protection available under federal law for transgender individuals. However, there is currently no legal precedent for this.</p>	no	limited staff involvement	N/A
<p>Non-English Forms - Work with Metro Multifamily Housing Association and other property management trade association to translate rental forms into other languages and to make interpreters available to explain documents and translate communications related to reasonable accommodation, landlord tenant disputes, and disputes among tenants.</p>	<p>Impediment #2 Discrimination-Race, Color, National Origin: People who do not have strong English language skills face barriers to housing, because key documents, including leases, policies, disclosures, statements of rules, and/or compliance forms are not typically available in languages other than English. Cultural differences, including the lack of a common language, can impede landlord/tenant communication. The tenant may not receive clear instruction about the application process, or property rules. Language difficulties diminish the landlord’s ability to resolve differences, and facilitate tenant disputes.</p>	no	limited staff involvement	N/A

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
<p>Limited Independent Living Options – Support advocates working to increase independent living options for persons with disabilities forced to live in institutional settings.</p>	<p>Impediment #1 Discrimination-Disability: Some persons with disabilities who want to live in the community are forced to live in more restrictive settings than they would prefer, due to the lack of adequate funding for services to support independent living. Federal, state, and county budget cuts to independent living services have stranded people with disabilities in nursing homes, assisted living facilities, adult foster care, and other institutional settings.</p>	<p>no</p>	<p>Limited staff involvement</p>	<p>N/A</p>

TABLE 64: ADVOCACY-RECOMMENDATIONS RELATED TO HOUSING CHOICE

Recommendations for continuation of current efforts and/or commencement of new corrective actions	Impediment or significant issue	Place in FY06-07 Action Plan	Resource Allocation (Proposed)	Responsible Jurisdiction or entity
Lower Income to Rent Ratios - Work with landlord and property management industry to adopt lower income to rent ratios.	Significant Issue #4 Screening Criteria: Landlord screening criteria that require a high income to rent ratio puts housing out of reach of many low-income households.	No (similar activities, e.g. Risk Mitigation Pool are already included)	limited staff involvement	N/A
High Health Care Costs – Support work of advocates to address health care costs of low-income households.	Significant Issue #4 Screening Criteria: High health care costs require lower income households to make choices between paying their medical bills or paying rent/mortgage.	no	limited staff involvement	N/A

GLOSSARY

ABA	American Bankers Association
Accessibility	Accessibility refers to unit modifications that make it possible for people in wheelchairs to enjoy full use of their living space. Some examples include lowered cabinets, wider doorways, roll in showers, and ADA approved doorknobs.
ADA	Americans with Disabilities Act – Federal law prohibiting discrimination against people with disabilities in housing, employment, and the provision of public services.
AFFH	Affirmatively Further Fair Housing. Program rules increasingly link funding and operational considerations to activities that remove barriers to fair housing identified in the Analysis of Impediments.
AI	Analysis of Impediments to Fair Housing. An examination of barriers to fair housing. The study guides fair housing planning and programming.
ALF	Assisted Living Facility
B2H	Bridges to Housing. A program being designed in Multnomah, Washington, Clark, and Clackamas counties for homeless families that provides rent subsidy for families to access permanent housing and transitional services to stabilize families.
CAPER	Consolidated Annual Performance Evaluation Report
CAT	Community Alliance of Tenants (Portland)
CDBG	Community Development Block Grant. Housing and Community Development Act of 1974 is the statutory basis for the CDBG program 42 USC 5302ff regulations are at 24 CFR Part 570. Community Development Block Grant. The cities of Portland and Gresham and urban Multnomah County each receive CDBG funds from HUD. These funds are fairly flexible and can be used for activities such as housing, public services, community facilities, public improvements, economic development and community revitalization.
CDC	Community Development Corporation. Non-profit corporations that develop affordable housing and support community revitalization in specified target areas.

CDP	Census Designated Place
Census Tract	Census Tract is made up of Census Block Groups, which in turn are made up of Census Blocks.
CLT	Community Land Trust. A structure for holding property that separates ownership of the land from ownership of the building and permits the homeowner to benefit from appreciation of the building while holding the land in public trust.
CHAS	Comprehensive Housing Affordability Study. The first five-year housing plan adopted in 1991 by the City of Portland. The Con Plan is now used in place of the CHAS.
Con Plan	Consolidated Plan. The Consolidated Plan is a planning document required by HUD. It is intended to establish a unified vision for community development for a five year period, and to set out coordinated strategies to achieve the three goals established for HUD by the U.S. Congress: (1) provide decent housing; (2) provide a suitable living environment; and (3) expand economic opportunities. It has certain required sections, including a Housing Market Analysis and a Housing Needs Assessment.
Continuum of Care	A coordinated housing and service delivery system is called a Continuum of Care. A stream of funding specifically intended to serve homeless persons, Continuum of Care Homeless Assistance programs fund permanent and transitional housing for homeless persons.
CRA	Community Reinvestment Act
Cost Burden	The percentage of a household's total gross income spent on housing costs: <ul style="list-style-type: none"> • for renters, housing costs include rent paid by the tenant plus utilities; • for owners, housing costs include mortgage payment, taxes, insurance and utilities
ELL	English Limited Learners
FAR	Floor Area Ratio. This is the ratio of the allowable floor space to the plot square footage. E.G. a 40,000 square foot lot with 160,000 square feet of floor space would have a FAR of 4:1 (in this case by having 4 stories at least). Portland in some cases gives higher FARs as an incentive to developers to follow policy.

FHCO	Fair Housing Council of Oregon
FHA	The federal Fair Housing Act, 42 USC Sec. 3601 et seq., as amended, requires, among other things, that owners of rental housing not discriminate against potential tenants based on race, sex, color, religion, national origin, disability, or familial status.
HAMI	Household Average Median Income
HAMFI	HUD Adjusted Mean Family Income. This is the MFI adjusted for each Metropolitan Statistical Area.
HAP	The Housing Authority of Portland is a public housing agency that develops and operates affordable rental housing and administers housing and service programs for very-low and low-income residents of Multnomah County, including the Section 8 Voucher program.
HCDC	Housing and Community Development Commission. Created by statute, HCC is a 15 member volunteer board that advises the elected official in Consortium jurisdictions on affordable housing and community development policy. HCDC also advocates, when necessary, for low-and moderate-income residents of the County.
HMDA	Home Mortgage Disclosure Act. Requires all banks, savings and loans, savings banks and credit unions with assets over \$32 million and offices in metropolitan areas to report mortgage applications.
HOAC	Home Ownership Advisory Committee. The Homeownership Advisory Committee is a sub-committee of HCDC. The Portland City Council has charged HOC with reviewing homeownership policy and programs for the City of Portland and making recommendations to improve policy and program. HOAC has focused its work on analyzing the strategies to close the minority homeownership gap.
HOPA	Housing for Older Persons Act of 1995
HOPWA	Housing Opportunities for Persons with AIDS is an entitlement program funded by HUD and administered by the City of Portland for a seven-county area including Multnomah, Washington, Clackamas, Yamhill, and Columbia Counties in Oregon and Skamania and Clark Counties in Washington.

HOME	HOME Investment Partnership. Authorized for the purposed of (1) expanding the supply of affordable housing for the low-and very low-income families with an emphasis on rental housing; (2) building state and local non-profit capacity to carry out affordable housing programs and (3) providing coordinated assistance to participants in development of affordable low-income housing. Portland is the lead jurisdiction for the Portland HOME Consortium.
HOPE VI	Hope VI: A funding program sponsored by the U.s. Department of Housing and Urban Development to rebuild dilapidated public housing.
Housing First	The Housing First approach to ending homelessness has two goals: 1) To place those who are currently homeless directly into permanent housing; and 2) to ensure long-term housing stability after housing placement by providing formerly homeless people with follow-along services and offering appropriate individualized services (including mental health and/or substance abuse treatment, when needed).
No Housing Unit Problem	Map designation meaning that the unit has at least the minimum plumbing and kitchen facilities.
HUD	U.S. Department of Housing and Urban Development
IEP	Individual Education Plan for kids with disabilities.
Independent Living Program	A program that provides a range of services to prepare youth for independent living.
Iris Court	HOPE VI project in NE Portland.
Low-income Household	A low-income household has household income that is 50% or less of the area median income for a household of its size. HUD sets the area median income each year by publishing a table that shows median incomes for households of different sizes.
LRPH	Low Rent Public Housing. HAP's low-rent public housing program currently provides 2,809 units of public housing in Multnomah County.
Market Rate Housing	Housing for which rents are not subsidized, suppressed, or restricted; 'market' varies by neighborhood and location.
MCC	Multnomah County Consortium
Moderate Income Household	A moderate-income household has household income that is 80% or less of the area median income for a

household of its size. HUD sets the area median income each year by publishing a table that shows median incomes for households of different sizes.

Multnomah County	The elected body that has the ultimate responsibility for the implementation of the Consolidated Plan, by County social service and anti-poverty programs. The Multnomah County Commission has full budgetary authority over all of Multnomah County's Departments and must approve their budgets, including the allocation of HUD funds.
McKinney Funds	Homestreet: Continuum of Care
MFI	Median Family Income
NAHA	National Affordable Housing Act. Programs funded under NAHA operate under more substantive standards. These must certify that they are in compliance with civil rights laws, and that they act to affirmatively further fair housing. This Act created the CHAS.
New Columbia	Name of the Hope VI development in NE Portland formerly known as Columbia Villa.
ONI	Office of Neighborhood Involvement. Formerly Office of Neighborhood Associations, ONI is a City of Portland bureau, funded by general fund dollars, that promotes citizen participation and communication among the city's neighborhoods, both directly and through neighborhood-based district coalition and area offices.
PDC	Portland Development Commission
Permanent Housing	Affordable rental housing in which the tenants have the legal right to remain in the unit as long as they wish, as defined by the terms of a renewable lease agreement.
PMAR	Portland Metropolitan Association of Realtors
RAHS	Metro's Regional Affordable Housing Strategy
Ready to Rent	Tenant readiness education program and landlord guarantee fund to help renters who will not pass screening criteria due to past rental history, credit, or criminal records.
RTF	Residential Treatment Facility. Residences that serve six or more residents and have rotated staffing patterns.

RTH	Residential Treatment Housing Residences that serve five residents and have a rotated staffing pattern. (Homestreet)
Section 504	Section 504 of the Rehabilitation Act - Nondiscrimination Under Federal Grants and Programs, provides that no otherwise qualified individual with a disability shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
Section 8	A federally-funded housing subsidy program; subsidies may be provided directly to the property owner, by contract (project-based Section 8) or by vouchers to individual tenants, to be used in renting a unit on the private market.
Shared Appreciation Mortgages	A subsidized mortgage where the investment return received on the property at sale is shared between the property owner and the provider of the subsidized market.
Special Needs	The Special Needs population is that population with a mental or physical disability who require services to be successful residents in independent housing.
Transitional Housing	A place that a family can stay for a maximum period of time (typically 3 months to two years) in preparation for a move to permanent housing; often, residents of transitional housing receive intensive services during their period of residence.
Tri-Met	Public transportation authority that serves Multnomah, Clackamas, and Washington Counties.
URAC	PDC's Urban Renewal Citizen Advisory Committees
Very Low-Income	Households whose incomes do not exceed 30% of the median income for the area, as determined by HUD.
ORS 90.262	Landlord-tenant laws in Oregon.
ORS 197.314	State statute requiring local jurisdictions to allow manufactured housing in all zones where single family housing is allowed.